

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15 (Sched. B) (the Act);

**AND IN THE MATTER OF** an Application by Enbridge Gas Distribution Inc., under sections 19 and 44 of the Act, for an exemption under section 2.2.2 of the *Affiliate Relationships Code for Gas Utilities*.

**INTERROGATORIES TO ENBRIDGE GAS DISTRIBUTION INC. (EGD)**

**from**

**INDUSTRIAL GAS USERS ASSOCIATION (IGUA)**

1. **Reference:** Application, page 8; Appendix B, page 17; *Affiliate Relationships Code for Gas Utilities*, November 25, 2010 (ARC), section 1.2.

The Application states: *“As Enbridge does not offer any competitive retail energy services in Ontario, its employees can gain no foreseeable business advantages from having such incidental access to customer information.”*

The Application further discloses that Tidal Energy Marketing Inc. (Tidal) is an affiliate of EGD *“that conducts natural gas marketing activity in Ontario for industrial and wholesale customers. Tidal Energy buys, sells, transports and provides storage for natural gas. Tidal Energy does not provide energy services in the retail energy market.”*

- (a) Please explain what EGD means by *“competitive retail energy services”* in the first quotation from the Application excerpted above.
  - (b) Please explain what EGD means by the phrase *“retail market”* in the second excerpt above.
2. **Reference:** Application page 8, paragraph 17; ARC sections 2.2.2 and 2.2.3.

EGD seeks exemption from ARC section 2.2.2 in its entirety.

Section 2.2.3 of the ARC states:

*A utility may share employees with an affiliate provided that the employees to be shared are not directly involved in collecting, or have access to, confidential information.*

- (a) Please confirm that EGD is not proposing, in respect of its proposal to fully opt into Enbridge Inc.'s ITSS services, to eliminate the need for:
    - (i) Protective access protocols (including data management, data access and contractual provisions) for those shared employees who will provide the subject ITSS services to EGD.
    - (ii) Any requirement to ensure compliance with such access protocols and contractual provisions through a review which complies with the provisions of section 5900 of the CICA Handbook.
  - (b) Please confirm that the scope of EGD's ARC exemption request is limited to its proposal to provide Enbridge Inc. employees and designated ITSS contractors with access to EGD customer data on an incidental basis in the course of carrying out their responsibilities as described in the application, and that the balance of ARC section 2.2.2 would continue to apply. If this is not the case, please clarify which parts of ARC section 2.2.2 would continue to apply, if any.
  - (c) Please explain why EGD has not requested exemption from section 2.2.3 of the ARC in respect of the shared ITSS activities described in the evidence.
3. Please provide a list, and provide a brief description of, all other ARC exemptions which EGD has been granted and which remain in place as of the date of the response to this interrogatory.
4. **Reference:** Application page 2, paragraph 6; Appendix B, Part 4.

The "*Business Case for ARC Exemption*" discusses in some detail two categories of cost savings associated with the proposed EGD full opt in to Enbridge Inc. ITSS; CAM related and RCAM related.

- (a) Please explain how CAM related cost savings are relevant, now or in future, to EGD's delivery ratepayers, and the mechanism, if any, for such savings being of benefit to ratepayers.
  - (b) Please explain how RCAM related cost savings are relevant, now or in future, to EGD's delivery ratepayers, and the mechanism for such savings being of benefit to ratepayers.
5. **Reference:** Appendix B, Page 14.

The evidence states:

*Currently the entire service desk team (support and agents) are designated as EGD employees or contractors, allowing EGD to comply with the ARC from a customer confidentiality perspective. However this approach does not accurately reflect the current enterprise model and results in significant additional accounting manipulation in order to correctly allocate the increased cost of the EGD employees to other affiliates.*

Please describe the nature of the “significant additional accounting manipulation” currently engaged in.

6. **Reference:** Appendix B, page 15.

The evidence states:

*...EGD is in the process of creating an ARC FAQ document to circulate to all ITSS to raise awareness and reinforce employees on what is required to comply with the ARC.*

Please file a copy of the completed FAQ.

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