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Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Board File No. EB-2016-0004 Parkland Fuel Corporation ("Parkland") – Further and Better Responses

Further to the direction of the Board Panel at the Pre-Hearing Day yesterday, Parkland is seeking a further and better response to Parkland Interrogatory #3 to Enbridge (Exhibit S3.EGDI.Parkland.3).

In that interrogatory, Parkland sought information about: (a) how Enbridge estimated the natural gas <u>conversion costs</u> (including assumptions used and the basis for such assumptions) included in Table 1 of Enbridge's evidence; and (b) how Enbridge estimated the <u>cost savings</u> (including assumptions used and the basis for such assumptions) included in Table 1 of Enbridge's evidence.

In its response to Parkland, Enbridge referenced its response to CCC Interrogatory #8 (Exhibit S3.EGDI.CCC.8). That response provided some information about the <u>conversion costs</u> (i.e., item (a) in the paragraph above), but no information about how Enbridge came up with its <u>cost savings</u> estimates (i.e., item (b) in the paragraph above).

Evidence on the comparative cost between natural gas and other fuels lies at the heart of this proceeding, since any differential would be a key factor in any conversion decision by a consumer. It is, therefore, a key input into the customer forecasts by the gas utilities and the viability of any expansion proposal. The cost savings figures put forward is an important component of Enbridge's evidence in this proceeding, and a complete record necessitates a better understanding of the assumptions underpinning those figures (and the basis for the assumptions).

Attached for the Board's convenience is the interrogatory response at issue (Exhibit S3.EGDI.Parkland.3) and the two responses that it references (Exhibit S3.EGDI.CCC.8 and Exhibit S3.EGDI.OGA.6).

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Yours truly,

Richard King AD

Intervenors in EB-2015-0179 and EB-2016-0004 cc:

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ENBRIDGE GAS DISTRIBUTION INC. (ENBRIDGE) RESPONSES TO INTERROGATORIES OF PARKLAND

INTERROGATORY #3

Reference: Enbridge EB-2016-0004 Evidence, pg. 15, Table 1

Enbridge provides an estimate of natural gas conversion costs and cost savings relative to incumbent fuels, including propane.

- a. How did Enbridge estimate natural gas conversion costs? Discuss all assumptions used and the basis for those assumptions.
- b. How did Enbridge estimate the cost savings of natural gas relative to propane? Discuss all assumptions used and the basis for those assumptions.

RESPONSE

Please refer to interrogatory responses to CCC Interrogatory #8 at Exhibit S3.EGDI.CCC.8 and OGA Interrogatory #6 at Exhibit S3.EGDI.OGA.6.

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ENBRIDGE GAS DISTRIBUTION INC. (ENBRIDGE) RESPONSES TO INTERROGATORIES OF CCC

INTERROGATORY #8

Reference: EGD Evidence/p. 15

Please provide the assumptions used to derive Table 1.

<u>RESPONSE</u>

Table 1 assumptions:

- Average annual consumption = 2,400 m³
- SES = $$0.23 / m^3$
- Average Annual SES Charge = \$552.00
- Fuel Type Penetration and Annual Bill for alternate fuels from Enbridge customer research survey September, 2015. Natural gas price is Enbridge Gas Distribution's Rate 1 burner tip price (Oct 2015).
- Electricity to NG
 - Electricity Forced Air to NG Forced Air conversion = \$3500
 - Electricity Baseboards to NG Forced Air = \$11,000
 - 50:50 split weighted average = \$7250
- Heating Oil to NG
 - Oil Boiler to NG Boiler with Conversion Kit = \$1,500
 - Oil Boiler to New NG Boiler = \$4000
 - o 20:80 split weighted average = \$3500
- Propane to NG
 - Propane Forced Air to NG Forced Air with Conversion Kit = \$675
 - Propane Forced Air to new NG Forced Air = \$3500
 - 70:30 split weighted average approximately = \$1525
- Wood to New NG Stove Conversion = \$3500

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Exhibit S3.EGDI.OGA.6

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ENBRIDGE GAS DISTRIBUTION INC. (ENBRIDGE) RESPONSES TO INTERROGATORIES OF OGA

INTERROGATORY #6

Ref: [p. 15]

Please provide detailed calculations, with sources, for the annual average energy cost savings of \$1,700 and the average cost of conversion of \$3,500.

RESPONSE

Please see the Company's response to CCC Interrogatory #8 at Exhibit S3.EGDI.CCC.8.