May 4, 2016

Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street P.O. Box 2319 Toronto, Ontario M4P 1E4

Dear Ms. Walli:

#### Re: EB-2016-0028 - Enbridge Gas Distribution Inc. - Rate 332 Tariff Application

Please find, attached, interrogatories on behalf of the Consumers Council of Canada for Enbridge Gas Distribution Inc. pursuant to the above-referenced proceeding.

Please feel free to contact me if you have questions.

Yours truly,

Julie E. Girvan

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CC: All Intervenors

EGD, Regulatory Affairs Fred Cass, Aird & Berlis

#### INTERROGATORIES FROM THE CONSUMERS COUNCIL OF CANADA

# FOR ENBRIDGE GAS DISTRIBUTION INC. EB-2016-0028

#### CCC-1

Reference: Ex. B/p. 2

Through this application Enbridge is seeking approval of its Tariff for Parkway to Albion King's North gas transportation service that it will provide under Rate 332. That Tariff is based on the fact that 1,200 TJ/day of capacity of the Albion Pipeline will be used for transportation services. 800/TJ/day will be used to serve Enbridge's in-franchise distribution customers. This allocation was approved by the Board in its EB-2012-0451 Decision.

a) If the pipeline is undersubscribed will this impact how much of the pipeline is paid for by Enbridge's in-franchise distribution customers? If, so please explain how.

#### CCC-2

## Reference: Ex. B/p. 5

In the leave to construct proceeding Enbridge had proposed that 800 TJ/day would be used for the distribution of gas to its in-franchise customers. Does Enbridge still require 800 TJ/day for its in-franchise customers? If not, could Enbridge make more capacity on the Albion Pipeline available for transportation purposes? If Enbridge does not require 800 TJ/day of capacity for its in-franchise customers what happens to the excess capacity?

#### CCC-3

#### Reference: Ex. B/p. 8

The evidence states that in the event that the total contracted capacity on the Albion Pipeline is anything other that the 1,200 TJ/day, Enbridge will file a proposal to vary the Board's order in this case. Please explain what, specifically, Enbridge would be seeking to vary. Could this impact the allocation of the pipeline costs to in-franchise customers?

#### CCC-4

# Reference: Ex. B/p. 8

The evidence states that the Contract Demand Charge calculation assumes the costs as indicated in the EB-2012-0451 and EB-2012-0459 proceedings. Please provide the project costs presented in those cases and the current projected costs. What is the current balance in the Greater Toronto Area Incremental Transmission Capital

Revenue Requirement Deferral Account? What is the revenue requirement that will be allocated to in-franchise customers?

### CCC-5

# Reference: Ex. B/p.4

If, in the future, Enbridge determines that it needs less than 800 TJ/day for it infranchise customers, will Enbridge propose a change to the allocation of the Albion Pipeline costs between in-franchise and ex-franchise customers upon rebasing? If not, why not?