



## Jay Shepherd

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**BY EMAIL and RESS**

June 10, 2016  
Our File: EB20160142

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario  
M4P 1E4

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2016-0142 – Enbridge DVA and ESM Disposition – SEC Interrogatories**

We are counsel to the School Energy Coalition (“SEC”). Enclosed, please find interrogatories on behalf of SEC.

Yours very truly,  
**Jay Shepherd P.C.**

*Original signed by*

Mark Rubenstein

cc: Wayne McNally, SEC (by email)  
Applicant and intervenors (by email)

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**ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** an Application by Enbridge Gas Inc. for an order or orders approving the clearance or disposition of amounts recovered in certain deferral or variance accounts;

**INTERROGATORIES**

**ON BEHALF OF THE**

**SCHOOL ENERGY COALITION**

**SEC-1**

[Ex.B-1-3, p.2] Please provide details of the \$5.8M sale of base pressure gas.

**SEC-2**

[Ex.C-1-2] Please provide details regarding Enbridge's actual performance compared to the UDC Management Plan agreed to in the EB-2014-0276 Settlement Agreement.

**SEC-3**

[Ex.D-1-2, p.2] The evidence states that the GTA Reinforcement project costs are forecasted to be \$235.5M more than what the approved amount in the EB-2012-0451 proceeding:

- a. When does Enbridge plan on bringing forward this amount for a review for prudence?
- b. Please confirm that none of those costs will be included in rates until the Board has reviewed the prudence of the variance.

Respectfully submitted on behalf of the School Energy Coalition this 10<sup>th</sup> day of June, 2016

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy  
Coalition