

June 28, 2017

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

Dear Ms. Walli:

**Re: EB-2017-0102 –Enbridge Gas Distribution Inc. – 2016 Earnings Sharing Mechanism and Deferral and Variance Accounts**

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*

Julie E. Girvan

CC: All Intervenors  
EGD, Regulatory Affairs

**INTERROGATORIES FOR ENBRIDGE GAS DISTRIBUTION INC.**

**FROM THE CONSUMERS COUNCIL OF CANADA**

**EB-2017-0102**

1. (Reference: Ex. B/T2/S4/p. 2)

The evidence states the GTA project variance of \$143.4 million is related to delays, permitting issues and construction complexities. If the project had been on time and budget how would this have impacted 2015 and 2016 earnings and the earnings amounts allocated to ratepayers? Please provide a schedule which sets out the projected GTA amounts and the actual GTA amounts for each year of the project.

2. (Reference: Ex. B/T2/S4/p. 2)

The evidence states that the overall WAMS project spend was \$90.1 million an amount which exceeded the original budget amount by \$20 million. If the project had been on time and on budget how would this have impacted 2014, 2015 and 2016 earnings and the earnings amounts allocated to ratepayers? Please provide a detailed explanation of the variance.

3. (Reference: Ex. B/T2/S4/p. 4)

The evidence states that EGD's productivity effort with respect to Departmental Labour costs was \$8.9 million. Please provide a detailed calculation setting out how the \$8.9 million was derived. Is this net of severance costs?

4. (Reference: Ex. B/T2/S4/p. 4)

Please provide a detailed calculation setting out how the \$8.9 million in IT underspending was derived. Please explain the nature of the IT Infrastructure Consolidation project with Enbridge Inc.

5. (Reference: Ex. B/T4/S2/p. 2)

The evidence states that the RCAM is \$15.3 higher due to the centralization of IT and HR Services to Enbridge Inc. Please explain the nature of these cost increases and how the \$15.3 million was derived. Please explain why these costs allocated to EGD?

6. (Reference: Ex. C/T1/S1/p. 2)

Please explain why EGD continues to carry amount in the Manufactured Gas Plant Deferral Account if the amounts are not material. When were those costs incurred? Why is it not appropriate to close the account?

7. (Reference: Ex. C/T1/S6/p. 2)

EGD intends to defer refunding \$4.7 million (of the total \$9.7million) related to the pension variance because the EB-2011-0354 Settlement Agreement included a \$5 million annual cap for clearance. Does EGD expect that actual 2017 OPEB amounts will be lower than forecast? If so, would EGD agree to refund the full 2016 amount of \$9.7 million? If not, why not?

8. (Reference: Ex. C/T1/S7/p. 2)

Does the amount EGD is seeking to recover with respect to the Low Income Customer Service Rules - \$.280 million – meet EGD’s materiality threshold for Z-factor treatment?

9. (Reference: Ex. C/T1/S11/p. 2)

EGD is seeking to recover \$840,336 related to EGD’s Cap and Trade Program. Does this amount meet EGD’s materiality threshold for Z-factor treatment?