



BY EMAIL and RESS

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

November 3, 2017
Our File: EB20170086

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2017-0086 – Enbridge Gas Distribution Inc. – SEC Interrogatories

We are counsel to the School Energy Coalition (“SEC”). Pursuant to Procedural Order No. 1, please find SEC’s interrogatories.

Yours very truly,
Shepherd Rubenstein P.C.

Original signed by

Mark Rubenstein

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

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 Distribution Inc. (“Enbridge”) for an Order or Orders approving or fixing rates for the sale, distribution, transmission and storage of gas.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

SEC-1

[C1-2-1, p.7] Please provide a table showing for each year between 2013 and 2017, the Board approved contract market unlocks and actual contract market actuals.

SEC-2

[C1-2-1, App C] With respect to the cap and trade impact on 2018 volume forecast, please provide the specific 2018 cap and trade charges that Enbridge used to model the impact on the volume forecast.

SEC-3

[D1-2-3, p.4] Please explain how Enbridge will mitigate the impact of the delay in the NEXUS pipeline if it does not go in-service until at least 2019 (i.e. will not be in-serve for the entirety of the 2018 test year).

SEC-4

[D1-2-2] Please explain how after the merger between Enbridge Inc. and Spectra, Enbridge is leveraging its new affiliate Union, to lower gas supply and transportation costs.

SEC-5

[D1-2-2, p.12] Please provide a list of storage facilities that are owned by any affiliates of Enbridge, its location, the transmission pipeline it connects to, and its capacity.

SEC-6

[D1-2-11, p.6-7] Please confirm that Enbridge opposed at the NEB, in whole or in part, TCPL’s proposed Dawn LTFP service approval application. Please explain why, and now that it has been approved, what the impact of the new is Enbridge’s gas commodity and transportation costs in the Test Year, and more generally?

SEC-7

[D1-2-11, p.13] Please file a copy of the ICF study in this proceeding.

SEC-8

[D1-2-11, p.13] Please file a copy of the referenced Direct Purchase market survey.

SEC-9

[D1-5-1, p.3] With respect to the new harmonized non-Union pension plan:

- a. Please provide a copy of the material provided to Enbridge employees explaining the changes in their pension plan.
- b. Please provide a chart showing for all major components of the pension plan, what was included in, i) the previous Enbridge plan, ii) the previous Spectra plan, and iii) the new harmonized plan.
- c. Please provide the revenue requirement impact of the harmonization for the Test Year.

SEC-10

[D1-5-1, App 1, p.2] Please explain how Mercer incorporated impact of the Ontario Ministry of Finance upcoming pension reforms. Please provide the revenue requirement impact of that proposed change in the 2018.

Respectfully submitted on behalf of the School Energy Coalition this November 3rd, 2017

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition