



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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December 8, 2017
Our File: EB20170147

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2017-0147 – Enbridge Fenelon Falls Expansion – 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 (Sched. B), as amended (the “OEB Act”) and the *Municipal Franchises Act*, R.S.O. 1990, c. M.55, as amended (the “MF Act”);

AND IN THE MATTER OF an application under section 36 of the OEB Act for an order or orders approving a rate to be applied as a System Expansion Surcharge in respect of each Community Expansion Project by Enbridge Gas Distribution Inc.;

AND IN THE MATTER OF an application by Enbridge Gas Distribution Inc. under section 90 of the OEB Act for an order or orders granting leave to construct natural gas distribution pipelines and ancillary facilities to serve the community of Fenelon Falls in the City of Kawartha Lakes;

AND IN THE MATTER OF an application under section 8 of the MF Act for an order or orders granting a Certificate of Public Convenience and Necessity to Enbridge Gas Distribution Inc. for the construction of works in the City of Kawartha Lakes.

NOTICE OF INTERVENTION

OF THE

SCHOOL ENERGY COALITION

SEC-1

[EB-2015-0179, Decision and Order (August 10 2017)] Will Enbridge commit to providing a revised DCF calculation based on actuals after the 10-year forecast risk period is over in the event that it seeks to recover any revenue requirement shortfall, as similarly required by the Board in EB-2015-0179?

SEC-2

[EB-2015-0179] Please explain how the key features of Enbridge’s expansion proposal are the same or differ from the amended Union Gas proposal in EB-2015-0179. Please explain the rationale for any differences.

SEC-3

[B-1-1, p.13-14] Please explain why the Applicant believes it is appropriate that all of its customers, and not just those in the proposed expansion community, bear the risk or benefit of variances in capital costs.

SEC-4

[B-1-1, p.15] Please explain why the Applicant is not treating the annual ITE ‘revenue’ as a CIAC.

SEC-5

[B1-1-1, p.15] With respect to the Natural Gas Grant Program:

- a. Please provide an update on the status of the proposal and information Enbridge has on when the decision will be made by the Ministry of Infrastructure.
- b. Please provide a copy of the submitted grant application for this project.

SEC-6

[B1-1-1, p.20] Please explain the basis of the 75% customer conversion rate after 10 years.

SEC-7

[F1-1-1, 7] Please provide a copy of the DCF Analysis in excel format with all formulas intact.

Respectfully submitted on behalf of the School Energy Coalition this December 8th, 2017.

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition