

10 Four Seasons Place, Suite 802
Toronto, Ontario M9B 6H7
Phone: 416.622.9449
Fax: 416.622.9797

March 8, 2018

Via RESS and Courier

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

**RE: Enbridge Gas Distribution and Union Gas
Amalgamation and Rate-Setting Mechanism Applications
Ontario Energy Board File Numbers: EB-2017-0306 and EB-2017-0307**

Interrogatories of Ontario Association of Physical Plant Administrators

Please find attached the interrogatories of the Ontario Association of Physical Plant Administrators for Enbridge Gas Distribution and Union Gas in the above-noted proceeding.

Yours truly,



Valerie Young
Director, Research and Analysis

cc. A. Mandyam, Enbridge Gas Distribution
M. Kitchen, Union Gas
F. Cass, Aird & Berlis
N. Splinter, OAPPA / Queen's University
M. Millar, Board Staff
K. Viraney, Board Staff
I. Richler, Board Staff
EB-2017-0306 and EB-2017-0307 Intervenors

COMBINED PROCEEDING - EB-2017-0306 and EB-2017-0307

INTERROGATORIES of the ONTARIO ASSOCIATION OF PHYSICAL PLANT ADMINISTRATORS to
Enbridge Gas Distribution (EGD) and Union Gas (Union)

MAADs Application / "No Harm" Test / Issues 1 and 2

1. Reference: EB-2017-0306, Exhibit B, Tab 1, pp.20-23 (Price) and EB-2017-0307, Evidence Addendum dated January 11, 2018

Do the two additional adjustments requested at p. 3 of the Evidence Addendum in EB-2017-0307 affect the revenue requirement comparison in Table 3 at p. 20 of Exhibit B, Tab 1 in EB-2017-0306? If yes, please update Table 3.

2. Reference: EB-2017-0306, Exhibit B, Tab 1, pp. 35-36 (Estimated Cost Efficiency Opportunities / Other Functions)
 - i. Are EnTRAC and Unionline two of the "smaller software systems" included in the discussion of "Other Functions"?
 - ii. Please describe the proposed plans that EGD/Union have for rationalizing these two systems including how long they may continue to operate separately and how any transition period would be managed.

Rate-Setting Mechanism / Rate Framework / Issue 1

3. Reference: EB-2017-0307, Exhibit B, Tab 1, pp. 4 and 10 (Y Factors)
 - i. EGD/Union are proposing the continued pass-through of "routine" gas commodity and upstream transportation costs. Please describe what EGD/Union would consider to be "routine" costs under a price cap IR mechanism during a deferral period and what would be considered "non-routine" gas commodity and upstream transportation costs. How would non-routine costs be addressed?
 - ii. Is it the proposal of EGD/Union to maintain the QRAM-related methodologies and formats currently used by each of EGD and Union individually during a deferred rebasing period? If not, what modifications are being considered?

Rate-Setting Mechanism / Rate Framework / Issue 1

4. Reference: EB-2017-0307, Exhibit B, Tab 1, p. 11 (Cap-and-Trade)

EGD/Union indicate that costs associated with cap-and-trade will be filed in future proceedings. Please explain more fully.

Rate-Setting Mechanism / Rate Framework / Issue 3

5. Reference: EB-2017-0307, Exhibit B, Tab 1, p. 29 (Rate Design)
 - i. EGD/Union indicate the general drivers that may result in EGD/Union proposing changes to regulated service offerings, cost allocation and rate design during a deferred rebasing period. Please describe the types of “identified issues”, “improvements, and “changing business needs” that EGD/Union expect might drive the need for changes.
 - ii. Do EGD/Union propose to maintain all current regulated service offerings during a deferred rebasing period? If not, please explain.
 - iii. Please provide a summary of the current process followed by each of EGD and Union for changing general terms and conditions and service-specific terms and conditions, including how changes are communicated to customers. Please explain how EGD/Union propose to deal with such changes during a deferred rebasing / transition period.

Rate-Setting Mechanism / Other / Issue 14

6. Reference: EB-2017-0307, Exhibit B, Tab 1, pp. 20-22 (Customer Protection Measures) and Attachment 2 (Scorecard)
 - i. Of the measures included in the proposed Scorecard, please identify those that EGD/Union consider applicable to large-volume/contract customers.
 - ii. Please describe the criteria or measures that EGD and Union currently use to assess large-volume/contract customer satisfaction and would their use continue under the EGD/Union proposal? If not, how would EGD/Union plan to assess large-volume/contract customer satisfaction?

Rate-Setting Mechanism / Other / Issue 15

7. Reference: EB-2017-0307, Exhibit B, Tab 1, pp. 28-29 (Reporting)

EGD/Union indicate that during a deferred rebasing period, customer engagement processes would continue to be developed with the results of those processes informing business plans. Please describe the customer engagement processes contemplated for large-volume/contract customers and how those results would be factored into business plans and subsequently communicated back to this particular customer group.

Rate-Setting Mechanism / Other / Issue 16

8. Reference: EB-2017-0307, Exhibit B, Tab 1, p. 27 (Stakeholder Meeting)

What is the rationale for holding a stakeholder meeting every other year during a deferred rebasing period starting in 2019 rather than every year?