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January 28, 2019

Reply To: Thomas Brett
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Our File No. 190444

VIA RESS, EMAIL AND COURIER

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

Attention: Kirsten Walli,
Board Secretary

Dear Ms. Walli:

Re: EB-2018-0319: Enbridge Gas Inc., Open Bill Access Services

Pursuant to Procedural Order No. 1, please find enclosed herewith BOMA's Interrogatories.

Yours truly,

FOGLER, RUBINOFF LLP

A handwritten signature in blue ink, appearing to read 'Tom Brett', with a large, stylized flourish at the end.

Thomas Brett
TB/dd
Encl.

cc: All Parties (*via email*)

ONTARIO ENERGY BOARD

Enbridge Gas Distribution Inc.

**Application for approval to continue the existing financial terms associated with
offering Open Bill Access services for the years 2019 and 2020**

Interrogatories of

Building Owners and Managers Association of Greater Toronto ("BOMA")

January 28, 2019

Tom Brett

Fogler, Rubinoff LLP

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P.O. Box 95, TD Centre North Tower

Toronto, ON M5K 1G8

Counsel for BOMA

1. Reference: Exhibit A, Tab 2, Schedule 1, Page 2 of 5

“Among other things, the 2014 OBA Settlement set out the pricing and costing for OBA services for 2014 to 2018 and continued the approach to sharing of net revenues with ratepayers (which includes an embedded \$5.389 million credit to ratepayers each year).”

Interrogatory:

(a) Please explain why the credit to ratepayers is the same each year. How was this amount determined?

(b) Please provide the annual costs and revenues for the Open Bill Access Program since its inception.

2. Reference: Exhibit A, Tab 2, Schedule 1, Page 3 of 5

“Enbridge is not yet in a position to propose a longer extension of the OBA program, because there are several unknown items at this time. These include the impacts of integration of Enbridge and Union Gas (including the potential integration or updating of customer billing services), as well as the impacts of the OEB’s proposed changes to customer service rules for gas distribution companies (EB-2017-0183). Enbridge expects to file a proposal related to the continuation of OBA services beyond December 2021 after some of these unknown items are more clear.”

Interrogatory:

Are any of the options under consideration with respect to the integration of Enbridge and Union Gas to abandon the Open Bill Access Service?

3. Reference: Exhibit A, Tab 2, Schedule 1, Page 3 of 5

“The persons affected by this Application are Billers under the OBA program and Enbridge’s customers. It is impractical to set out the names and addresses of these persons because they are too numerous.”

Interrogatory:

How many Billers participated in the program for each year from the program's inception?

Who are the Billers for 2018?

4. Reference: Exhibit B, Tab 1, Schedule 1, Page 6 of 6

"With close to 1.4 million customers still having charges on their bill, there is a clear indication that customers appreciate the OBA program."

Interrogatory:

Please provide the number of customers having charges on their bills for each year since the program's inception. Does the use of the term in the evidence "still" imply that there has been a reduction since its inception?

5. Reference: EB-2013-0099; Exhibit N1, Tab 1, Schedule 1, Page 6 of 10

"If that proportion is greater than 75% for the prior year, then Enbridge will take one of the following steps by June 30th of the following year (for example, by June 30, 2017 if the threshold is exceeded for 2016):

- i. Discontinue the Bill Insert program; or*
- ii. Make application (within the deferral and variance account proceeding or as a separate application) to continue the Bill Insert program in a manner that will allow it to obtain greater market participation."*

Interrogatory:

What was the outcome of this provision?

6. Reference: EB-2013-0099; Exhibit N1, Tab 1, Schedule 1, Page 7 of 10; Financial consequences of the OBA program for 2014 to 2018

Interrogatory:

- (a) The total costs of the program for each of the years 2014 to 2018, and the forecast cost for 2019 and 2020. Please provide a detailed itemized calculation of the

program costs which make use of, among other things, how the amounts in the lines labelled "Cost per Shared Bill", "Cost per Standalone Bill", and "Bill Insert Cost per Bill" contributed to the total cost for each year.

- (b) Please confirm that the annual revenues from the OBA include all of the revenue items included in the Open Bill Agreement between Enbridge and each Biller, including transition plan charges, late payment charges, and arbitration awards.
- (c) Please confirm that ratepayers will have no liability for Biller's failure to pay any of their obligations under any of the provisions of the Open Bill Agreement.
- (d) Please provide the yearend balance in the Open Bill Revenue Variance Account for each year, and the amounts claimed for those amounts in the subsequent year.
- (e) Please provide a link to the Open Bill Access Manual.

7. Ref: Open Bill Exhibit D, Tab 1, Schedule 1, Attachment 3, Appendix B

Please explain the meaning and operation of the Biller Percentage as set out in Appendix B, and confirm that ratepayers are not responsible for any bad debts incurred by the Company or the Billers as a result of customers failing to pay Biller's charges, included on Enbridge's bills.