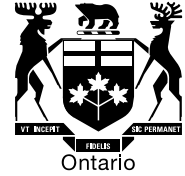


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BY E-MAIL

January 31, 2019

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Union Gas Limited – EB-2018-0300
Enbridge Gas Distribution Inc. – EB-2018-0301
Applications for Disposition of 2016 Demand Side Management Deferral
and Variance Accounts**

In accordance with Procedural Order No. 1, please find attached OEB staff's interrogatories in the above noted proceeding. As the applications are being heard by the OEB on a combined basis, interrogatories for both Union Gas Limited (now operating as Enbridge Gas Inc.) and Enbridge Gas Distribution Inc. (now operating as Enbridge Gas Inc.) have been included.

Interrogatory responses are due by February 19, 2019.

Yours truly,

Original Signed By

Josh Wasylyk
Project Advisor – Application Policy & Climate Change

OEB Staff Interrogatories
2016 Demand Side Management Deferral and Variance Account Applications

Union Gas Limited (now operating as Enbridge Gas Inc.)
EB-2018-0300
Enbridge Gas Distribution Inc. (now operating as Enbridge Gas Inc.)
EB-2018-0301

January 31, 2019

Below are OEB staff's interrogatories for both Union Gas and Enbridge Gas. OEB staff has reviewed the interrogatories filed by School Energy Coalition (SEC) on January 23, 2019 and has endeavored to only ask incremental questions or include additional requests to those requested by SEC. Similar to SEC, the questions below that are identical for both Union Gas and Enbridge Gas are marked by *.

Interrogatories to Union Gas (EB-2018-0300)

OEB Staff.Union.1*

Reference: Exhibit A, Tab 2, Page 8-9 of 24

Union Gas has requested approval of audit-adjusted 2016 targets and makes reference to a number of OEB documents to support its position.

- a) Please provide a direct reference to an OEB statement indicating that the approved 2016 targets would be subject to any adjustments.

OEB Staff.Union.2 (Similar to SEC 39)*

Reference: Exhibit B, Tab 1, Table 11, Page 131 of 140

As part of its 2016 DSM Annual Report Union Gas has provided details of its approved DSM spending and actual DSM spending.

- a) Please provide "Table 11.0 – Summary of 2016 Budget and Spending" in a live Excel format. In addition to the live Table 11, please provide clear details on where program funding was shifted from one program to another. Further, where a program budget changed, please explain the reasonableness for increasing that program budget with reference to need, program performance and timing of when the budget increases were required.

OEB Staff.Union.3

As part of the OEB's Report related to the Mid-Term Review of the 2015-2020 DSM Framework (EB-2017-0127/EB-2017-0128), it instructed Enbridge to file a draft accounting order as part of its 2016 DSM DVA application. The draft accounting order would revise the DSMVA to allow for Enbridge to track future financial commitments for programs with deferred customer incentives, both within the 2015-2020 framework period as well as outside of current term.

- a) Please indicate if Union may be required to access some of its 2015-2020 approved DSM program spending in a different year than that which it was approved. Further, please indicate if Union may be required to access some of its approved 2015-2020 DSM spending outside of the current term. In the event that there is a possibility that Union may be required to access program funding outside of the current term due to deferred customer incentives, please provide a draft accounting order that revises the description of the current DSMVA.

Interrogatories to Enbridge Gas (EB-2018-0301)

OEB Staff.Enbridge.1*

Reference: Exhibit B, Tab 1, Schedule 1, Page 8 of 18, Paragraph 19

Enbridge Gas has requested approval of audit-adjusted 2016 targets and makes reference to a number of OEB documents to support its position.

- a) Please provide a direct reference to an OEB statement indicating that the approved 2016 targets would be subject to any adjustments.

OEB Staff.Enbridge.2 (similar to SEC 19)*

Reference: Exhibit B, Tab 2, Schedule 1, Page 144 of 245, Table 10.3 – DSMVA Determination: 2016 Spending vs. Amount Built Into Rates

Enbridge Gas has provided details on its DSMVA balance, approved 2016 budget and actual 2016 spending.

- a) In excel format, with all cells open and calculations visible and accessible, please expand "Table 10.3 – DSMVA Determination" to show the spending for each program compared to the OEB approved budget for that program (incorporating data from Table 10.1 is satisfactory). In addition to the expanded Table 10.3, please provide clear details on where program funding was shifted from one

program to another. Further, where a program budget changed, please indicate the reasonableness for increasing that program budget with reference to need, program performance and timing of when the budget increases were required.

OEB Staff.Enbridge.3

Reference: Exhibit B, Tab 4, Schedule 1 – Rate Allocation and Clearance of 2016 DSM Balances

Enbridge Gas has requested approval to recover its 2016 DSM deferral and variance account balances from rate payers as a one-time adjustment within the next available QRAM following the OEB's Decision and Order.

- a) Please confirm that Enbridge's proposed cost allocation and disposition methodologies are consistent with prior year OEB Decisions. If there are any instances where Enbridge has made changes, please clearly identify where changes have been made and provide justification.