

May 10, 2019

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

Dear Ms. Walli:

EB-2018-0331 - Enbridge Gas Inc. – Cap and Trade – Deferral and Variance Account Balances 2016-2018

Please find, attached, interrogatories on behalf of the Consumers Council of Canada for Enbridge Gas Inc. pursuant to the above-referenced proceeding.

Please feel free to contact me if you have questions.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: EGI, Regulatory Affairs
All Parties

INTERROGATORIES FOR ENBRIDGE GAS INC.

**RE: EB-2018-0331 – CAP AND TRADE – DEFERRAL AND VARIANCE ACCOUNTS
FOR THE PERIOD 2016-2018**

FROM THE CONSUMERS COUNCIL OF CANADA

CCC-1

Re: Ex. B/p. 2

Please provide detailed evidence to support the statement that, “The actual 2017 and 2018 administration costs of both Utilities were consistent with the level of such costs in other jurisdictions.”

CCC-2

Re: Ex. B/p. 5

Enbridge Gas is seeking a determination from the OEB that the final Cap-and-Trade deferral and variance account balances, summarized in Ex. A/Table 2 are reasonable. Please confirm that all of the costs included in Table 1 are subject to a prudence review in this proceeding.

CCC-3

Ex. B/T 1/p. 5 and Ex. B/T2/p. 5

The total Administration Costs for EGD were \$5.375 million (with interest). The total Administration Costs for Union were \$8.323 million (with interest). Please provide a detailed explanation as to why the costs for Union are almost \$3 million higher than the costs for EGD.

CCC-4

Ex. B/T1/p. 6

Three new roles were added throughout the year. When were each of those roles filled? Does the \$533,00 amount reflect the fact that the roles were added throughout the year?

CCC-5

Ex. B/T1 and T2

Please provide one schedule setting out the consulting costs for each year 2016, 2017 and 2018 for both Union and EGD. Please describe the nature of those consulting assignments. Please explain the extent which Union and EGD did, or did not, collaborate with respect to the consulting work undertaken in this three-year regarding Cap-and-Trade.

CCC-6

Ex. B/T1 and T2

Please provide one schedule setting out the actual external legal costs for each year 2016, 2017 and 2018 for both Union and EGD. Please explain the variances between Union and EGD.

CCC-7

Ex. B/ T1 and T2

Please provide a schedule setting out all IT and Billing costs incurred by Union and EGD for each year 2016, 2017 and 2018. Please provide the revenue requirement impact for each of the Utilities.

CCC-8

Ex. B/T1 and T2

Please provide one schedule setting out all wages and salaries and FTES for both Union and EGD (in a separate column) for each of the years 2016, 2017 and 2018. Please explain the variances between Union and EGD. Please include a list of all positions that were hired by both Union and EGD specifically related to Cap-and Trade during the period 2016-2018.