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May 10, 2019

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St.
Toronto, ON

Dear Ms. Walli:

**Re: EB-2018-0331 – Enbridge Inc. EPCOR Natural Gas Limited Partnership
Applications for the disposition of Cap and Trade-Related Deferral and Variance
Accounts for the period 2016-2018
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed the interrogatories of Intervention of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

(Original Signed By)

John Lawford
Counsel for VECC

Copy to:
Enbridge Inc.
EPCOR Natural Gas Limited Partnership

EB-2018-0331

Enbridge Inc.

EPCOR Natural Gas Limited Partnership

Applications for the disposition of Cap and Trade-Related Deferral and Variance

Accounts for the period 2016-2018

Vulnerable Energy Consumers Coalition (VECC) Interrogatories

VECC IR-1

Ref: Ex B P2

Preamble: The evidence indicates the actual 2017 and 2018 administration costs of both Utilities were consistent with the level of such costs in other jurisdictions.

Please provide the 2016, 2017 and 2018 administration costs for each Utility (Enbridge and Union) as a percentage of annual compliance costs.

Enbridge Gas Distribution (Enbridge) Rate Zones

VECC IR-2

Ref: Ex B T1 P5 Table 4

- a) Please add a column to show the 2016 forecast of Administration Costs.
- b) Please explain any variances.

VECC IR-3

Ref: Ex B T1 P6

Please explain if the cost of existing roles to take on incremental cap and trade work is included in total administration costs. If yes, please provide a breakdown of existing FTEs by title and the corresponding cost.

VECC IR-4

Ref: Ex B T1 P6 Table 5

- a) For each of the FTEs in Table 5, please confirm they are new roles and indicate the month these roles were filled in 2016.

- b) For each of the FTEs in Table 5, please indicate if the role was filled by internal staff or externally and indicate if the position was filled on a permanent or temporary basis.

VECC IR-5

Ref: Ex B T1 P7

Please provide a breakdown of Enbridge's forecast versus actual consulting costs in 2016 and explain any variances.

VECC IR-6

Ref: Ex B T1 P7

With respect to Other Costs, please indicate the party that undertook the customer market research and outreach and education.

VECC IR-7

Ref: Ex B T1 P9

- a) Please provide a Table that shows the titles of the planned 8 FTEs in 2017 compared to actuals.
- b) For each of the actual FTEs, please indicate if the role was filled by internal staff or externally and indicate if the position was filled on a permanent or temporary basis.
- c) Please provide a table that shows 2017 FTE Breakdown by Activity similar to Union's Table at Exhibit B Tab 2 Page 7 Table 5.

VECC IR-8

Ref: Ex B T1 P11

Please provide a breakdown of Enbridge's incurred costs of \$0.151 million related to the consultation and development of the OEB's Regulatory Framework for the Assessment of Costs of Natural Gas Utilities' Cap and Trade Activities.

VECC IR-9

Ref: Ex B T1 P12

Please provide Enbridge's forecast compared to actual employee travel costs in 2016, 2017 and 2018.

VECC IR-10

Ref: Ex B T1 P13 & P9

- a) Please explain why the forecast salaries and wages for 2018 (\$1.5 million), are greater than the forecast for 2017 (\$1.12 million) when both forecasts include costs for 8 FTEs.

- b) Please provide the total increase in headcount as a result of the Cap-and-Trade program at June 30, 2018.

VECC IR-11

Ref: Ex B T1 P14

Please explain how Enbridge treats the 2018 Cap-and-Trade vacancies in 2018 and beyond. For example, are the unfilled/unused FTE positions deleted?

VECC IR-12

Ref: Ex B T1 P14

Please provide a table that shows FTE Breakdown by Activity for the 4 FTEs allocated to Federal Carbon activities.

VECC IR-13

Ref: Ex B T1 P17

Please provide the current status of the 4 Cap-and-Trade FTEs retained to support the FCPP.

Union Gas Limited (Union) Rate Zones

VECC IR-14

Ref: Ex B T2 P6 Table 4

- a) Please add a column to show the 2016 forecast of Administration Costs.
- b) Please explain any variances.

VECC IR-15

Ref: Ex B T2 P6 Table 4

- a) Please provide a Table that shows FTE breakdown by Title for the 13 new roles and portions of existing roles.
- b) For each of the new FTEs in 2016, please indicate if the role was filled by internal staff or externally and indicate if the position was filled on a permanent or temporary basis.

VECC IR-16

Ref: Ex B T2 P12

Preamble: Union indicates the OEB passed on costs of \$0.112 million. At Exhibit B Tab 1 Page 11, Enbridge indicates the costs passed on to Enbridge by the OEB were \$0.167 million. Enbridge also indicates it incurred costs of \$0.151 million in 2017 for its work related to the consultation for the development of the OEB's Regulatory Framework for the Assessment of Costs of Natural Gas and Utilities' Cap and Trade Activities.

Did Union participate in the development of the OEB's Regulatory Framework for the Assessment of Costs of Natural Gas and Utilities' Cap and Trade Activities? If not, why not?

VECC IR-17

Ref: Ex B T2 P15 Table 10

- a) Please confirm the Federal Carbon FTEs were formerly Cap-and-Trade FTEs.
- b) Please provide the status of the FTEs no longer working on Cap-and-Trade.
- c) Please explain how Union accounts for the 2018 Cap-and-Trade vacancies in 2018 and beyond.

VECC IR-18

Ref 1: Ex B T2

Please provide a breakdown of Union's forecast compared to actual employee travel costs for the years 2016 to 2018.

VECC IR-19

Ref 1: Ex B T2 P19

- a) Please provide a table that shows FTE Breakdown by Activity for the 3 FTEs required to ensure compliance with the GGPPA.
- b) Please provide the current status of the 4 Cap-and-Trade FTEs retained to support the FCPP.