



PUBLIC INTEREST ADVOCACY CENTRE  
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

---

October 9, 2019

VIA E-MAIL

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
Toronto, ON

Dear Ms. Walli:

**Re: EB-2018-0105 Enbridge Gas Distribution Inc.  
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)**

---

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

Yours truly,

Mark Garner  
Consultants for VECC/PIAC

For interrogatory clarifications please contact Mark Garner at 647-408-4501 or [markgarner@rogers.com](mailto:markgarner@rogers.com)

<b>REQUESTOR NAME</b>	<b>VECC</b>
<b>TO:</b>	<b>Enbridge Gas Inc. (EGI)</b>
<b>DATE:</b>	<b>October 9, 2019</b>
<b>CASE NO:</b>	<b>EB-2019-0105</b>
<b>APPLICATION NAME</b>	<b>2018 Disposition of Deferral &amp; Variance Account Balances</b>

---

VECC-1

Reference: Exhibit A/T3/pages 4-

- a) Enbridge discusses its inability to administer one-time adjustments in the Union rate zone. Does the Company have a timeline for the integration/update of the Union legacy system such that it can provide a consistent means of account dispositions similar to that in the former EGD zone? If yes, please explain when this is targeted for completion and specifically if it is anticipated whether such a system will be in place in time for next year's account/ESM dispositions.

VECC-2

Reference: Exhibit B/T1/page 7 & Exhibit C/T1/pages 29-

- a) If one were to remove the outlier years of 2001 through 2006 for unaccounted for gas volumes (UFG) how would the resulting average UFG compare to the 106,677 10<sup>3</sup>m<sup>3</sup> built into rates.
- b) Please provide a table similar to Table 1 (UFG 1991-2018) for the Union rate zone.

VECC-3

Reference: Exhibit B/T1/page 21 & Exhibit C/T1/page 63-

- a) What was the first full year under which the Board's revised cost assessment was charged?

- b) Please explain why the Enbridge rate zone uses the 2015-2016 year as the basis for comparison of assessments whereas the Union rate zone uses 2013.
- c) Please recalculate the both rates zones on the basis of comparison to the actual assessed costs in the last full year prior to the Board's change in assessment methodology.

VECC-4

Reference: Exhibit B/T1/page 21 & Exhibit C/T1/page 63-

- a) Are both Cost Assessment accounts subject to the \$ 1 million materiality threshold?
- b) If the Union rate zone account is subject to a \$ 1 million materiality threshold why is the amount sought for disposition not \$0.203 million (net of interest costs) rather than \$1.203 million?

VECC-5

Reference: Exhibit B/T1/pages 28-

- a) Given the resolution of the Cityscape lawsuit is Enbridge now seeking to close the MGPDA? If not please explain why not.
- b) Is this the first (and only) disposition ever sought for the MGPDA? If not please provide a summary of all amounts collected from customers from this account.
- c) Please provide a breakdown of the costs sought into (1) settlement cost with Cityscape; (2) legal fees; (3) consultant and other fees.
- d) Please explain what efforts Enbridge took to mitigate the costs to ratepayers of this action.

**END OF DOCUMENT**