

DR QUINN & ASSOCIATES LTD.

VIA E-MAIL

November 5, 2019

Ontario Energy Board
Attn: Kirsten Walli, Board Secretary
P.O. Box 2319
27th Floor, 2300 Yonge Street
Toronto ON M4P 1E4

RE: EB-2019-0105 – EGI 2018 Deferral Acct. Disposition – Request for Fulsome Answers

REQUEST

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) with regard to the interrogatory responses provided by Enbridge Gas Inc. (“EGI”) on October 28th in the above subject proceeding. We have reviewed the responses and found several matters to which, in our view, EGI did not respond. We are concerned that absent provision of the missing information, we will need to ask a number of questions at the outset of the settlement process which will not be efficient. Further, depending upon subsequent disclosure in a potential settlement document, the Board may not have the required information to determine if the settlement and the documented agreements are in the public interest.

To assist the Board, we would respectfully request that Enbridge provide more fulsome answers to the following interrogatories in writing to the Board prior to the start of settlement discussions:

Exhibit I.FRPO.2

EGI responded: *“In March 2019, the OEB invoiced Enbridge Gas Inc. for its incremental costs associated with the merger proceeding separately, and the Company expensed the invoice to O&M.”*

In subsection ii), we asked: If not (**not allocating costs of the merger proceeding to the company corporately i.e., not the utility**), please provide the company’s position on why the corporation should not bear some cost responsibility. That part of the question was not answered. (**bold added for context of the question**).

We ask that EGI provide a response.

Exhibit I.FRPO.3

EGI provided a redacted version of the matrix citing confidentiality. We understand the concern regarding pricing and respect that redaction. However, in our preamble, we stated: “Specifically, please provide the deliverability parameters or curves that EGD would have seen in RFP process.” These parameters unless accompanied with price do not have commercial sensitivity. We respectfully request a reduction in the scope of the redaction. If EGI will not provide publicly, we ask they provide a completed unredacted version under the Board’s confidentiality practices and we will pursue differently.

Exhibit I.FRPO.5

We asked: Please provide the monthly percentage targets that EGD used in 2018?

Those percentages were not provided.

Exhibit I.FRPO.9

We asked: Please provide a more detailed description of the reduction in the Other category and a breakdown to any components that were reduced significantly.

The interrogatory response stated: “The detailed explanation of the major drivers of the reduction in the Other category is provided in Exhibit B, Tab 2, Appendix D, Schedule 2, page 2, line 18.”

That reference provides: “Increase in Other mainly due to reduction in IR budget of \$19.0M based on OEB decision partially offset by other smaller favourable items.”

Please provide a more detailed description of the OEB decision, its implications and the smaller favourable items.

Exhibit I.FRPO.22

We asked: What is the source of the monthly heat value that Union uses for DP customers?

The interrogatory response stated: *The source of the monthly heat value legacy Union Gas uses for DP customers is a “best available” monthly heat value taken from its CARE System.*

Respectfully stated, please define the CARE system, the source of the heat value and what is meant by “best available”.

While we have more questions of clarification that would best be handled in dialogue with EGI.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. R. Torul, EGI Regulatory Proceedings – EGI
Interested Parties – EB-2019-0105