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November 18, 2019

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto ON
M4P 1E4

Dear Ms. Long,

**RE: EB-2019-0194 Enbridge 2020 Rates
Energy Probe Technical Conference Questions**

Here are the questions of Energy Probe for the Technical Conference.

EP-TC1 Average Use Forecast -EGD Rate Zone

Reference: EGD Rate Zone Exhibit D, Tab1, RO Working Papers, Schedule 10

Please provide in Tabular and Graphical Form the Rate 1 and Rate 6 EGD Rate Zone historic Average Use and the calculation of the 2020 forecasts.

Provide the Statistics- SD and T statistics

Please provide details of the 2020 HDD forecast

EP-TC2 Average Use Forecast -Union Rate Zones

Reference: Union Rate Zone Exhibit D, Tab 2, RO Working Papers, Schedule 13

Please update the Average use Tables provided in EB-2018-0305 Undertaking JT1.4

EP-TC3 Potential Double Recovery of Capitalized Indirect Overhead Costs

Reference: Exhibit B, Tab 1, Schedule 1, page 3, Union Rate Zone and EB-2019-0172, Exhibit C, Tab 4, Sch.1, page 1, and Interrogatory EP-6

Preamble: The Enbridge Gas response to EB-2019-0172 Enbridge Gas Windsor Pipeline interrogatory EP-6 regarding the \$14.1 million in Indirect Overhead costs that are capitalized states: *“Indirect overhead allocations (“OH”) are costs that support the delivery of capital projects but cannot be tied directly to a particular project. It is the capitalization of support services such as HR, IT, Finance, Legal, etc. and capital support (Engineering, Operations)”*. As Enbridge Gas is applying for ICM approval of the Windsor Pipeline Project, Energy Probe is concerned that there may be double recovery of \$14.1 million of HR, IT, Finance, Legal etc. costs through capitalization and through base 2020 IRM rates.

Please provide a spreadsheet or a table that demonstrates that the \$14.1 million of HR, IT, Finance, Legal and other costs that are being capitalized are excluded from recovery through 2020 base rates.

Respectfully submitted on behalf of Energy Probe,

Original signed by

Roger Higgin
SPA Inc.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.