

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998,  
S.O. 1998, c.15 (Sched. B);

**AND IN THE MATTER OF** an Application by Enbridge Gas Inc., pursuant to section 36(1) of the *Ontario Energy Board Act, 1998*, for an order or orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission and storage of gas as of January 1, 2020.

**INTERROGATORIES**

**FROM THE**

**SCHOOL ENERGYCOALITION**

1. [Ex. B/2/1, p. 4-5] Please restate line 3, 2014-2023, in each of Tables 1 and 2 excluding all ICM projects applied for or to be applied for. Please identify all such ICM projects excluded, including in each case a reference to the leave to construct, if any, that has been granted or applied for. Please provide a description of the main reasons, other than ICM projects, for the dramatic upward trend of spending in this category.
2. [Ex. B/2/1, p. 4] Please provide a detailed breakdown of line 5, 2014-2023, both by category of overhead and category of capital spending to which it relates, in each case in sufficient detail for the Board and the parties to understand the large jump in capitalized overhead in 2020.
3. [Ex. B/2/1, p. 4-5] Please assume for the purpose of this interrogatory that natural gas volumes in the Applicant's franchise area will decline over the next forty years. Please provide all studies, memos, presentations, or other documentation in the possession of the Applicant dealing with the possibility that capital assets being added to rate base in current years will ultimately be stranded or underutilized assets before the end of their useful lives.
4. [Ex. B/2/1, p. 23-26] Please provide details of all steps taken, and all studies and other analyses done (including copies of any such documentation), to reduce the peak demand served by the Windsor Line, now and in the future, in order to reduce its cost to ratepayers today.

5. [Ex. B/2/1, App. A, Table B] Please provide a detailed explanation for the large increase in IT Implementation capital costs, starting in 2020 and continuing until 2023. Please explain how this increase interacts with the merger-related IT costs, and provide details of those merger-related IT costs for each of those four years.
6. [Ex. B/1/1/C, p. 2] Please confirm that Enbridge plans to undertake a review of the cost allocation methodology of its entire system for its next rebasing application.
7. [Ex. B1/1/1/C] Please provide a bill impact table showing the impact of the proposed new cost allocation methodology, if implemented in either a) 2020 or b) implemented in 2021.
8. [Ex. B1/1/1/C] Please provide a bill impact table showing the impact of the proposed new cost allocation methodology on EGD Rate Zone customer transportation costs, if implemented in either a) 2020 or b) estimated impact if implemented in 2021.
9. [Ex. B1/1/1/C, p.12] Please explain how the proposed changes to the Panhandle and St. Clair systems differ from what Union Gas had proposed as part of the EB-2016-0186 proceeding.
10. [Ex. B1/1/1/C, p.12-13] Please describe what specific Dawn yard assets are directly allocated to the Panhandle System.
11. [Ex. B2/2/1] For each of the Don River Replacement and Windsor Line Replacement Projects:

Please complete the below table.

<b>Project Costs</b>			
	Latest Estimates Available	EB-2019-0194 Application	Leave to Construct Application
Materials			
Construction and Labor			
Contingencies			
IDC			
<i>Subtotal</i>			
Indirect Overhead			
<i>Total</i>			

Please provide a detailed explanation of all variances and explain why any costs increases are reasonable.

12. [Ex. B/2/1, p. 19] With respect to the Windsor Line Replacement Project:

- a. Please explain what would happen if the Board approves the ICM for the project, but subsequently denies the leave to construct application.
- b. [EB-2019-0172, C-5-1] Please provide a copy of the project schedule included in the leave to construct application.
- c. Please provide the most recent available project schedule.

13.[UFG Report, p. 16-17] Please provide Figure 5 and 6 in a tabular format.

14.[UFG Report, p. 47] Please provide Enbridge's response to the recommendations contained in the report and its plan to implement them.

Respectfully submitted on behalf of the School Energy Coalition this February 5, 2020.

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Jay Shepherd  
Counsel for the School Energy  
Coalition