

# MICHAEL R. BUONAGURO

Barrister and Solicitor

24 HUMBER TRAIL  
TORONTO, ONTARIO, M6S 4C1  
P: (416) 767-1666  
F: (416) 767-1666  
EMAIL: [mrb@mrb-law.com](mailto:mrb@mrb-law.com)

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February 4, 2020

Ms. Christine Long  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
26th Floor  
2300 Yonge Street  
Toronto, ON  
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Long,

**RE: EB-2019-0194 Enbridge Gas 2020 Rate Proceeding Phase 2**

Please find enclosed the interrogatories submitted on behalf of the Ontario Greenhouse Vegetable Growers.

If there are any questions with respect to the interrogatories, please feel free to contact the undersigned.

Yours very truly,



Michael R. Buonaguro  
Encl.

**EB-2019-0194**

**Enbridge Gas Inc.**

**Application for natural gas distribution rates and  
other charges effective January 1, 2020**

**PHASE 2 INTERROGATORIES OF THE ONTARIO GREENHOUSE  
VEGETABLE GROWERS**

*February 4, 2020*

Michael Buonaguro  
Counsel  
Ontario Greenhouse Vegetable Growers<sup>[1]</sup><sub>SEP</sub>  
24 Humber Trail  
Toronto, Ontario  
M6S 4C1

Phone 416-767-1666

Email: [mrb@mrb-law.com](mailto:mrb@mrb-law.com)

**OGVG-1**

Ref: General

Preamble: The Cost Allocation Study does not appear to provide information about the customers in each class affected by the proposed updated allocations.

- a) Please provide the number of customers in each of the Union Franchise Area rate classes consistent with the 2019 rate year used in the submitted Cost Allocation Study; please also provide the number of customers in each of the Union Franchise Area rate classes identified by Enbridge Gas as “greenhouses”.

Rate Class	Total Customers	Greenhouse Customers

**OGVG-2**

Ref: Exhibit B Tab 1 Appendix C Schedule 2 page 1 Column (a)

Preamble: There does not appear to be any text that explains the counterintuitive result (on its face) in the Cost Allocation Study that a particular category of costs would have a negative value.

- a) Please explain why the rate base figure under Purchase Production is negative.

**OGVG-3**

Ref: Exhibit B Tab 1 Schedule 1 Appendix C page 3

Preamble: The cost allocation study results, on their own, do not represent the final rate adjustment that may occur as part of a cost of service proceeding. The final rate adjustment of a cost of service proceeding would include rate design and other adjustments that may be required to manage revenue to cost ratios, maintain rate class continuity and address bill impacts.

- a) Please confirm that Enbridge Gas' current rates (for the Union Franchise area) are the result of the final rate adjustment performed in the context of the EB-2011-0210 proceeding (as adjusted over time through the application of incentive regulation), the most recent full cost of service proceeding in relation to the Union Gas Franchise area, with the results of that final rate adjustment being summarized in the Draft Rate Order filed by Union Gas on December 13, 2012, Working Papers, Schedules 13 and 14.

#### **OGVG-4**

Ref: Exhibit B Tab 1 Schedule 1 Appendix C page 6.

Preamble: Enbridge Gas has prepared the cost allocation study based on a 2019 test year. Enbridge Gas has based the revenue requirement on the 2019 forecast costs of the Union rate zones, which have been set to equal the forecast of 2019 revenue.

- a) Please explain what Enbridge Gas means when it says that the forecast costs of the Union rate zones have been set to equal the forecast of 2019 revenue; please explain to what extent the revenue requirement is based on the actual forecast of costs for 2019, and to what extent the revenue requirement has been, presumably, adjusted so as to be "set to equal the forecast of 2019 revenue".

#### **OGVG-5**

Ref: Exhibit B Tab 1 Schedule 1 Appendix C page 10.

Preamble: Both the Panhandle System and St. Clair System provide ex-franchise Rate C1 transportation between Dawn and Ojibway, St. Clair and Bluewater.

- a) Please confirm whether the Panhandle System provides ex-franchise Rate C1 transportation between Dawn and Ojibway and between St. Clair and Bluewater, or whether the Panhandle System only provides ex-franchise Rate C1 transportation between Dawn and Ojibway. Similarly, please confirm whether the St. Clair System provides ex-franchise Rate C1 transportation between Dawn and Ojibway and between St. Clair and Bluewater, or whether the St. Clair System only provides ex-franchise Rate C1 transportation between St. Clair and Bluewater.