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Our File # 339583-000267

By electronic filing

February 4, 2020

Christine E. Long  
Registrar and Board Secretary  
Ontario Energy Board  
2300 Yonge Street, Suite 2701  
Toronto, ON M4P 1E4

Dear Ms. Long

**Re: Enbridge Gas Inc. ("EGI")**  
**2020 Rates Application**  
**Board File #: EB-2019-0194**

Pursuant to the Board's Decision on Settlement Proposal and Interim Rate Order dated December 5, 2019, we submit the following Interrogatories for EGI on behalf of Canadian Manufacturers & Exporters ("CME").

Yours very truly

A handwritten signature in blue ink, appearing to read 'Scott Pollock', is written over a horizontal line.

Scott Pollock

enclosure

- c. Rakesh Torul and Stephanie Allman (EGI)  
David Stevens (Aird & Berlis)  
Alex Greco (CME)

OTT01: 10317121: v1

**ONTARIO ENERGY BOARD**

**Enbridge Gas Inc.**

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

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

**INTERROGATORIES OF  
CANADIAN MANUFACTURERS & EXPORTERS ("CME")  
TO ENBRIDGE GAS INC. ("EGI")**

**CME # 1**

**Ref: Exhibit A, Tab 3, Schedule 1, page 3 of 4**

At Exhibit A, Tab 3, Schedule 1, page 3, EGI states: "To account for certain major capital projects, Enbridge Gas is seeking Board approval of cost allocation methodology changes to the Panhandle System and St. Clair System, Parkway Station and Dawn Station. Enbridge Gas is proposing to implement the cost allocation methodology changes as part of its next rebasing proceeding."

As CME understands it, EGI is looking for the Board's approval of an updated cost-allocation methodology as part of this proceeding, but this new methodology would not be put into rates until EGI's next rebasing. In this regard:

- (a) Please confirm if CME's understanding of EGI's proposal is correct.
- (b) To the extent that CME's understanding is correct, is it EGI's view that the issue of cost allocation methodology would already be fully decided and approved by the Board and thus out of scope or unnecessary for the next rebasing application?
- (c) If the answer to (b) is no, please explain EGI's view on what it believes the Board's role would be during the rebasing application. Please give specific reference to the interaction between any undecided elements of the cost allocation methodology, and those elements that EGI is seeking the Board to approve as part of this application.

**CME # 2**

**Ref: Exhibit B, Tab 2, Schedule 1, page 7 of 31**

At Exhibit B, Tab 2, Schedule 1, page 7, EGI states: "EGD rate zone system renewal capital expenditures are mainly driven by Main Replacements, Meter Exchanges/Replacements,

Compressor Equipment, Regulator Refits and Service Relays. Union rate zones system renewal capital expenditures are mainly driven by Stations Replacements, Vintage Pipeline Replacement, the Integrity Management Program, Compression Equipment, and the Meter Exchange Program."

- (a) Please explain why the drivers of system renewal capital expenditures are so varied as between the EGD rate and Union rate zones.

**CME # 3**

**Ref: Exhibit B, Tab 2, Schedule 1 page 17 of 31**

At Exhibit B, Tab 2, Schedule 1, page 17, EGI describes the NPS 30 Don River Replacement Project.

- (a) Please update the table provided at Energy Probe Interrogatory 16(a) in EB-2018-0305 to include the current proposed Don River Replacement Project Cost. Please also explain any delta between the costs set out in EB-2018-0305 to now.

**CME # 4**

**Ref: Exhibit B, Tab 2, Schedule 1 page 18 of 31**

At Exhibit B, Tab 2, Schedule 1, page 18, EGI describes why the NPS 30 Don River Replacement Project has been rescheduled. With respect to the scheduling of the project:

- (a) When did EGI originally anticipate receiving the necessary permits to proceed with the NPS 30 Done River Replacement, and when were they actually received?
- (b) What was the original construction schedule?
- (c) Did EGI investigate the possibility of changing the timing of the customer's planned maintenance shutdown? If so, what was the result of that investigation. If not, why not?

**CME # 5**

**Ref: Exhibit B, Tab 2, Schedule 1 page 19 of 31**

At Exhibit B, Tab 2, Schedule 1, page 19, EGI describes the Windsor Line Replacement Project.

- (a) Please provide a table similar to those provided by EGI at Energy Probe Interrogatory 16(a) in EB-2018-0305 regarding the Windsor Line Replacement Project and the costs both during the leave to construct application, and the current anticipated costs.

**CME # 6**

**Ref: Exhibit B, Tab 2, Schedule 1 page 20 of 31**

At Exhibit B, Tab 2, Schedule 1, page 20, EGI provides business case summaries for the NPS 30 Don River Replacement Project and the Windsor Line Replacement Project.

- (a) Please provide the full business cases for the NPS 30 Don River Replacement Project and the Windsor Line Replacement Project rather than simply the business case summaries.

**CME # 7**

**Ref: Exhibit B, Tab 2, Schedule 1 page 21 of 31**

At Exhibit B, Tab 2, Schedule 1, page 21, EGI states: "Rather, the Bridge itself would be remediated to ensure structural stability against future flood events. Preliminary discussions identified the need for the use of some kind of sheet pile structures as a permanent remediation for the erosion around the bridge abutments. Based on the sensitivity of the adjacent 1911 (107 year old) twin bell and spigot 30" cast iron sanitary sewer mains (on wood piles), this option was deemed not viable."

- (a) Was the determination that this option was not viable made by Enbridge, or another stakeholder, such as the City of Toronto, TRCA or Metrolinx?

**CME # 8**

**Ref: Exhibit B, Tab 2, Schedule 1 page 21 of 31**

At Exhibit B, Tab 2, Schedule 1, page 21, EGI states: "In addition, from an Enbridge construction and maintenance perspective, the installation of a pipeline on a bridge is deemed to be a last resort."

- (a) Why are pipeline installation on bridges deemed to be a last resort?

**CME # 9**

**Ref: Exhibit B, Tab 2, Schedule 1 page 21 of 31**

- (a) Please confirm that EGI did not engage in a cost or timeline estimate for any of the other proposed options for the NPS 30 Don River Replacement Project.

**CME # 10**

**Ref: Exhibit B, Tab 2, Schedule 1 pages 25 and 26 of 31**

At Exhibit B, Tab 2, Schedule 1, pages 25-26, EGI states: "Enbridge investigated replacing the entire pipeline including the section that does not have a major leak history and has no active leaks (Remaining Pipeline) ...

The City of Windsor is planning phased road reconstruction along the Remaining Pipeline which is expected to take place over the coming years. Enbridge plans to complete the replacement of portions of the Remaining Pipeline in phases alongside the municipal roadwork."

- (a) Please explain why Enbridge would need/plan to replace the Remaining Pipeline at all if it does not have a major leak history and has no active leaks.

**CME # 11**

**Ref: Exhibit B, Tab 3, Schedule 1, pages 2 and 20 of 29;**

At Exhibit B, Tab 3, Schedule 1, page 2, EGI states: "Customers have responded positively to this change and relevant business metrics indicate Enbridge Gas has been successful thus far in both improving customer service and reducing costs."

At Exhibit B, Tab 3, Schedule 1, page 20, EGI states: "As anticipated given the scale of the eBill transition, Enbridge Gas experienced increased call and complaint volume relating to eBilling in 2019."

- (a) Has EGI conducted customer engagement to determine if the eBilling change, and the method of implementing EGI's eBilling was either:
  - i. Desired by customers; or
  - ii. Positively received by customers.
- (b) If the answer to (a) is yes, please provide the results of those customer engagements to the extent that they are not already a part of the record. If the answer to (a) is no, why not?

**CME # 12**

**Ref: Exhibit B, Tab 3, Schedule 1, page 19 of 29;**

At Exhibit B, Tab 3, Schedule 1, page 19, EGI states: "While commercial customers have been included within the transition to eBilling, the distribution of customers on eBill skews toward residential customers given they represent the lion's share of Enbridge Gas's customer accounts."

- (a) Does EGI possess disaggregated data on commercial and/or industrial customers regarding:
  - i. The adoption rate of the eBilling system as compared to how many continue to use paper bills; and
  - ii. The number of complaints received from these customer segments relative to the number of total customers?
- (b) If the answer to (a) is yes, please provide that data to the extent that it is not already part of the record.