



**BY EMAIL and RESS**

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Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario  
M4P 1E4

June 4, 2020  
Our File: EB20190247

**Attn: Christine Long, Registrar & Board Secretary**

Dear Ms. Long:

**Re: EB-2019-0247– EGI 202 FCPP – SEC Interrogatories**

We are counsel to the School Energy Coalition (“SEC”). Attached, please find a copy of SEC’s interrogatories.

Yours very truly,  
**Shepherd Rubenstein P.C.**

A handwritten signature in black ink, appearing to read "Mark Rubenstein", is written over a horizontal line.

Mark Rubenstein

cc: Wayne McNally, SEC (by email)  
Applicant and intervenors (by email)

**ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** an application by Enbridge Gas Inc. for  
an order or orders for gas distribution rate changes and clearing certain  
non-commodity deferral and variance accounts related to compliance  
obligations under the *Greenhouse Gas Pollution Pricing Act*, S.C.  
2018, c. 12, s. 186.

**INTERROGATORIES  
ON BEHALF OF THE  
SCHOOL ENERGY COALITION**

**SEC-1**

[Ex.C, p.7] With respect to the IT changes:

- a. Please provide details regarding what specific IT changes Enbridge undertook.
- b. Please explain how those additional capitalized amounts were costed (i.e. internal labour, external vendor charges etc).
- c. Please provide the full derivation of the revenue requirement.

**SEC-2**

[Ex. C, p.17] With respect to the 2020 forecast administrative costs:

- a. Please explain in detail how Enbridge has forecast the 1.84 million in incremental bad debt expenses for 2020
- b. Please confirm that any Federal Carbon Pricing Program related bad debt costs that are caused by the COVID-19 pandemic will be recorded in the in the relevant COVID-19 sub-account established by the Board on a generic basis (Account 1509). If not confirmed, please explain.

**SEC-3**

[Ex. D] Please explain how Enbridge took into account in its smoothing proposals for disposition of the DVA balances the impact of its various other rate deferrals it has proposed in other proceedings (i.e. July 1, 2020 QRAM adjustment (EB-2020-0144), 2020 Rates Adjustment (EB-2019-0194)). Please also provide Enbridge's view on the impact of the combined deferrals on customers.

Respectfully submitted on behalf of the School Energy Coalition, this June 4, 2020

A handwritten signature in black ink, appearing to be 'MR' followed by a stylized flourish.

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Mark Rubenstein  
Counsel for the School Energy Coalition