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Our File # 339583-000274

By electronic filing

July 6, 2020

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

Dear Ms. Long,

Re: Enbridge Gas Inc. (“EGI”)
Harmonized System Expansion Surcharge, Temporary Connection Surcharge and
Hourly Allocation Factor
Board File #: EB-2020-0094

Pursuant to the Board’s Procedural Order No. 1 dated June 15, 2020, 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 light blue horizontal line.

Scott Pollock

enclosure

c. Rakesh Torul (EGI)
Tania Persad (EGI Counsel)
Alex Greco (CME)
EB-2020-00094 Intervenors

114387726:v1

ONTARIO ENERGY BOARD

Enbridge Gas Inc.

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998,
S.O. 1998, c.15 (Sch. B), as amended ("OEB Act");

AND IN THE MATTER OF an application by Enbridge Gas
Inc. for an order or orders under section 36 of the Act
approving certain rate mechanisms for expansion projects
and a capital allocation factor for project economic feasibility
as per E.B.O. 188 Guidelines.

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

CME # 1

Ref: Exhibit B, Tab 1, Schedule 1, page 4 of 16

At Exhibit B, Tab 1, Schedule 1, page 4, EGI states that "The proposed rate of \$0.23 per cubic metre is appropriate for small volume customers as it was derived from a study that reviewed small volume customers' energy costs and conversion costs. Larger volume customers typically have different costs and potential savings such that \$0.23 per cubic metre would make conversion uneconomic."

- (a) Please provide the referenced study demonstrating the proposed rate of \$0.23 is appropriate.
- (b) Were any studies or other reports generated with respect to larger volume customers? If so, please provide them.

CME # 2

Ref: Exhibit B, Tab 1, Schedule 1, page 14 of 16

At Exhibit B, Tab 1, Schedule 1, page 14, EGI states: "Enbridge Gas is proposing that the threshold of eligibility be scaled with the size of the Development Project. For larger projects, Enbridge Gas would propose that the HAF apply only to large volume customers. For smaller projects, all customers, large and small, would be included. In the four previously approved LTC projects, the "floor" of HAF applicability was set at 200 cubic metre per hour."

- (a) What is the boundary for "larger projects" as opposed to "smaller projects"?

- (b) Why was 200 cubic metres per hour chosen as the HAF floor?
- (c) What is the principled reason EGI is proposing that only large volume customers would be charged the HAF for larger projects, instead of all customers in proportion? When answering, please discuss why this is the case when large projects were “primarily” but not entirely targeted at large volume customers.

CME #3

Ref: Exhibit B, Tab 1, Schedule 1, page 15 of 16

At Exhibit B, Tab 1, Schedule 1, page 15, EGI stated: “Enbridge Gas is proposing that the threshold of applicability be set by Enbridge Gas on a case by case basis.”

- (a) How does EGI’s proposed case-by-case threshold analysis for the HAF interact with EGI’s request that the Board approve the HAF in advance?

For instance, at Exhibit B, Tab 1, Schedule 1, page 2, EGI states that EGI would be able to use the HAF without obtaining Board approval.

Is the net result of these requests that EGI will be able to apply a previously unidentified threshold of applicability without additional Board approval? Please explain fully.

CME #4

Ref: Exhibit C, Tab 2, Schedule 1, page 3 of 11

At Exhibit C, Tab 2, Schedule 1, page 3, EGI stated: “Where the use of a proposed facility is dominated by a single large volume customer, it is considered a dedicated facility for CIAC purposes.”

- (a) Is “dominated” a defined term? If so, how much use of a facility is required in order for it to be a dedicated facility for CIAC purposes?

CME #5

Ref: Exhibit B, Tab 1, Schedule 1, page 5 of 16

At Exhibit B, Tab 1, Schedule 1, page 5, EGI stated: “In this application, Enbridge Gas is proposing to adopt the SES on the same basis as it has for previously approved projects in the Union rate zones (e.g., EB-2015-0179). As such, the Company is not proposing to periodically update the project’s PI for the duration of the SES term.”

- (b) Please provide a simple example of an SES showing the different impacts of updating the project PI and not updating the project PI during the SES term.