



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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July 6, 2020
Our File: EB20200094

Attn: Christine Long, Registrar & Board Secretary

Dear Ms. Long:

Re: EB-2020-0094 – Enbridge SES Harmonization – SEC Interrogatories

We are counsel to the School Energy Coalition ("SEC"). Attached, please find a copy of SEC's interrogatories in the above-captioned matter.

Yours very truly,
Shepherd Rubenstein P.C.

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), 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

ON BEHALF OF THE

SCHOOL ENERGY COALITION

SEC-1

[Ex. B] SEC seeks in a single table to understand what specific changes are being proposed from what, may or may not, be currently approved with respect to the SES and TCS. Please provide a single table that shows for each of the SES and TES, broken down by each component (e.g. rate, maximum length, calculation of length, terms and conditions, etc.), as i) what is currently approved for the Enbridge Rate Zone, ii) what is currently approved for the Union Rate Zones, and c) proposed in this application for Enbridge Gas.

SEC-2

[B-1-1, p.6] Please confirm that the TCS would attach to the property and not the a given owner/customer.

SEC-3

[B-1-1] With respect to the proposal:

- a. Please confirm that under the proposal, while Enbridge will not need the Board’s approval to apply the SES and TCS to any specific project, intervenors and the Board still have the ability to review the SES and TCS calculations from time to time (e.g. rebasing or in another rates application) and the Board will have the ability to vary their lengths as may be required if it disagrees with Enbridge’s calculation.
- b. Please confirm that for an expansion project to proceed, Enbridge must forecast the project achieving a P.I. of 1.0, over a maximum of 40 years (if an SES is applied), and 20 years (if a TCS is applied). If not confirmed, please explain Enbridge’s understanding.
- c. Please explain what happens if the Board upon a review determines that forecasts used to calculate the SES/TCS term and P.I. for a given project are unreasonable, and based on a revised forecast the appropriate length of the SES/TCS required to achieve a P.I. of 1.0 is greater than the maximum allowed periods (40 and 20 years respectively).

SEC-4

[B-1-1, p.12] With respect to the HAF, please provide a numerical example of its application.

SEC-5

[C-2-1, p.2] Enbridge states: “Individual projects are required to achieve a PI of 1.0 or the customer shall be required to pay a Contribution-in-Aid-of-Construction (“CIAC”) to bring the project up to the required PI level. In exceptional circumstances, a project may be authorized at a lower PI level (i.e. between 1.0 and greater than 0.8) as long as the Company maintains its overall portfolio PI above 1.0.” How does Enbridge decide which projects can have a PI 1.0 (but above 0.8) and which projects will not?

SEC-6

[EB-2017-0147, Decision and Order] In the Decision and Order in EB-2017-0147, the Board found with respect to the then Enbridge Gas Distribution proposal for a generic SES proposal (p.15):

“As a condition of this approval, Enbridge is required to issue a letter to the OEB informing it when a new group of customers is to be charged the SES.

The reporting on the Community Expansions is generally accepted. However, it is necessary for Enbridge to monitor and report on the PI for individual projects to determine when the SES charge is no longer required to reach a PI of 1.”

Does Enbridge propose in this application similar reporting requirements and a condition of approval? If not, please explain.

SEC-7

[EB-2016-0004] If Enbridge is not required to inform the Board before constructing and connecting new customers to a project if no leave to construct is required, how will the Board ensure that competition is facilitated consistent with the Generic Community Expansion Decision (EB-2016-0004). How would potential distributors who may be interested in constructing a distribution system be informed that Enbridge is considering service the specific community, and how would the Board have the necessary information to launch a competitive process.

Respectfully submitted on behalf of the School Energy Coalition this July 6, 2020.

Mark Rubenstein
Counsel for the School Energy Coalition