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September 2, 2020

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

DELIVERED BY EMAIL

Dear Ms. Long,

RE: EB-2020-0095 Enbridge Gas Inc. Application for natural gas rate increases effective January 1, 2021

Please find enclosed the interrogatories submitted to Enbridge Gas Inc. on behalf of the Ontario Greenhouse Vegetable Growers.

If any further information is required please do not hesitate to contact the undersigned.

Yours very truly,



Michael R. Buonaguro
Encl.

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board
Act, 1998, S.O. 1998, c.15 (Sched. B);

AND IN THE MATTER OF an Application by Enbridge Gas Inc., pursuant to section 36(1) of the *Ontario Energy Board Act, 1998*, for an order or orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission and storage of gas as of January 1, 2021.

**INTERROGATORIES SUBMITTED BY THE ONTARIO GREENHOUSE
VEGETABLE GROWERS (“OGVG”)**

To

ENBRIDGE GAS INC. (“EGI”)

September 2, 2020

OGVG-1

References: Exhibit B Tab 1 Schedule 1 Appendix A
Exhibit D Tab 2 Rate Order Working Papers Schedule 11 Page 1
EB-2013-0365, Union Gas Limited Settlement Agreement, Updated June 3, 2014, Appendix B, page 2, paragraph 8

Preamble: The evidence in the Application indicates that the Parkway Delivery Obligation (“PDO”) remains at a forecast level of 249 TJ/day.

The evidence in the Application indicates that the total PDO costs included in 2020 rates is \$25,286,000, and the requested total PDO costs to be included in 2021 rates is \$25,792,000.

The PDO Settlement indicates the following:

The equitable end-state which Union’s ratepayers seek is one which either eliminates in its entirety the PDO or, where it is more cost-effective to do so, calls for all ratepayers to compensate DP customers upon whom a PDO is imposed and who deliver PDO volumes at Parkway and sales service customers on whose behalf Union delivers volumes at Parkway for the benefit conferred on Union’s integrated system.

- a) Please provide the annual PDO expressed in TJ/day for the years 2014 (the year of the PDO Settlement) to 2021.
- b) Please provide the annual total PDO costs included in rates for the years 2014 to 2021.
- c) Please explain why the PDO is proposed to continue to exist in 2021, including an explanation as to why its continued existence is more cost-effective than its elimination.

OGVG-2

References: EB-2020-0095, Exhibit B Tab 1 Schedule 1, pages 9-10, paragraph 24
EB-2020-0067, Application for Clearance of 2017 and 2018 DSM related Accounts

Preamble: While EGI is including 2017 and 2018 LRAM amounts in the calculation of 2021 rates, the 2017 and 2018 LRAM amounts appear to be before the Board in EB-2020-0067 for approval.

- a) Please explain how any changes in the final 2017 and 2018 LRAM approved amounts as a result of the Board's decision in EB-2020-0067 will be accounted for if the Board were to approve 2021 rates based on the audited 2017 and 2018 LRAM amounts prior to the Board's determination in EB-2020-0067.