

Ms. Christine Long  
Registrar & Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

September 2, 2020

**Re: EB-2020-0095 EGI 2021 Rates – Phase 1  
Pollution Probe Interrogatories**

Dear Ms. Long:

In accordance with Procedural Order No. 1 dated August 18, 2020 for the above-noted proceeding, please find attached Pollution Probe's Interrogatories pertaining to Phase 1.

Respectfully submitted on behalf of Pollution Probe.



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cc: Mark Kitchen, Enbridge (via [EGIRegulatoryProceedings@enbridge.com](mailto:EGIRegulatoryProceedings@enbridge.com))  
David Stevens, Aird & Berlis (via email)  
All Parties (via email)  
Richard Carlson, Pollution Probe (via email)

**ONTARIO ENERGY BOARD**

**Enbridge 2021 Rates**

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**POLLUTION PROBE INTERROGATORIES**

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**September 2, 2020**

**Submitted by: Michael Brophy**  
**Michael Brophy Consulting Inc.**  
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**Consultant for Pollution Probe**

Pollution Probe #1

Reference: "... the 2021 Annual Update may show material differences from expectations set in the 5 Year Plan and the 2020 Annual Update. Enbridge Gas expects the Board and interested parties are eager to learn of the impacts COVID-19 will have on the Company's gas supply plan, and expects review of a 2021 Annual Update submitted in early 2021 will provide the insight sought." [Enbridge letter dated June 24, 2020 and filed in EB-2020-0135].

- a) Enbridge requested a delay in filing of the 2020 updates to its Gas Supply Plan and confirmed that material differences are expected for 2021. Please provide an update on the status of the 2021 plan updates and a best estimate for the date it will be filed.
- b) Please summarize the Gas Supply Plan updates made or still required for 2021 since the OEB reviewed the last version of Enbridge's Gas Supply Plan in March 2020 (date of final Board Staff Report in EB-2019-0137).
- c) Given the significant changes anticipated since the last Gas Supply Plan, how does Enbridge plan to reflect those changes in its 2021 Rates application?
- d) Please provide details on any 2021 Gas Supply Plan updates that impact gas commodity and upstream transportation costs in 2021.

Pollution Probe #2

[Ex. B, T1, Sch. 1]

- a) Does Enbridge expect COVID related cost increases or reductions in 2021? If so, please provide details and references if they were included in this application.
- b) Please provide details on any COVID related expenses expected to impact 2021 rates that are not included in this application.
- c) Has Enbridge recorded any 2020 costs or savings to either of the COVID deferral accounts? If so, please provide amounts and details.

Pollution Probe #3

[Ex. B, T1, Sch.1]

Please explain why the rate increase for a typical residential customer in the Union Rate zones are approximately four to five times greater than that of the EGD rate zone.