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September 2, 2020

Delivered by Email & RESS

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

Dear Ms. Long:

**Re: Enbridge Gas Inc. 2021 Rates Application
Interrogatories of the Association of Power Producers of Ontario (“APPrO”)
Board File No. EB-2020-0095**

In accordance with Procedural Order No. 1 dated August 18, 2020, please find attached APPrO’s Interrogatories in the above noted proceeding.

Yours very truly,

BORDEN LADNER GERVAIS LLP

Per:

Flora Ho

Flora Ho

cc: David Butters, APPrO
All Parties to EB-2020-0095

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.

EB-2020-0095

Interrogatories

To

Enbridge Gas Inc.

From

The Association of Power Producers of Ontario (APPrO)

September 2, 2020

Exhibit B

B-APPrO-1

Reference: Exhibit B Tab 1 Schedule 1 Page 13 of 18

Preamble: Pursuant to the Ontario Energy Board's ("Board") letter dated March 25, 2020, titled "Accounting Order for the Establishment of Deferral Accounts to Record Impacts Arising from the COVID-19 Emergency", Enbridge Gas plans to establish two deferral accounts in order to track any incremental costs and lost revenues related to the COVID-19 pandemic. The first account is to be used to track lost revenues arising from the COVID-19 emergency, while the second is to be used to track other incremental costs arising from the COVID-19 emergency.

The questions that follow are intended to gain a better understanding of Enbridge Gas' planned use of these two new deferral accounts.

Please assume for the purpose of these questions that no new guidance is provided by the Board as a result of its EB-2020-0133 stakeholder consultation. Please answer the following questions below based on what is currently known.

Question:

- (a) Given that significant COVID-related expenses could result in upward rate pressure for customers, what mitigation measures, if any, has Enbridge Gas taken to minimize any incremental costs arising from COVID-19?
- (b) Please provide several illustrative examples of the incremental costs arising from the COVID-19 pandemic that Enbridge Gas has incurred up until present. To the extent those incremental costs can be quantified or estimated at this time, please do so.
- (c) With reference to the examples identified in (b) above, how does Enbridge Gas propose to differentiate between incremental costs arising from COVID-19 and other costs?
- (d) What actions has Enbridge Gas taken, if any, to reduce capital or operating costs so as to mitigate against any adverse financial impacts arising from COVID-19?

- (e) How does Enbridge Gas propose to reflect the savings arising from these actions in its COVID-19 costs deferral account?
- (f) Has Enbridge Gas seen any lost revenue since start of the COVID-19 pandemic? If so, how has Enbridge Gas been tracking loss of revenue due to COVID-19 rather than other causes (for example, weather)?
- (g) Please provide a table outlining the calculation of Enbridge Gas' lost or increased revenues due to COVID-19 by customer class year-to-date.
- (h) Does Enbridge Gas possess any insurance to mitigate the risk of any key customer bill payment defaults?