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Our File # 339583-000276

By electronic filing

September 17, 2020

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2701
Toronto, ON M4P 1E4

Dear Ms. Long

Re: Enbridge Gas Inc. ("EGI")
2017/2018 DSM Deferral and Variance Account Disposition Application
Board File #: EB-2020-0067

Pursuant to Procedural Order No. 1 dated September 3, 2020, we submit the following Interrogatories for EGI on behalf of Canadian Manufacturers & Exporters ("CME").

Yours very truly

Scott Pollock

enclosure
c. Adam Stiers (EGI)
Dennis O'Leary (Aird & Berlis LLP)
EB-2020-0067 Intervenors
Alex Greco (CME)

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ONTARIO ENERGY BOARD

Enbridge Gas Inc.

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Schedule B, as amended;

AND IN THE MATTER OF an application by Enbridge Gas Inc. for an order or orders approving the balances and clearance of certain non-commodity 2017 & 2018 Demand Side Management deferral and variance accounts into rates, within the next available QRAM following the Board's approval.

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

CME # 1

Ref: Cover Letter

In its cover letter for this application, EGI proposed that the variance and deferral account balances be implemented in alignment with other rate changes through the quarterly rate adjustment mechanism. In its most recent QRAM, EGI determined that the bill increases for that quarter caused impacts that required mitigation (for instance 25% increases to commodity prices and 10% total bill impacts). According to EGI's evidence in that proceeding, the U.S. Energy Information Administration forecasts higher than normal gas prices in late 2020 and early 2021.

(a) Does EGI still propose to implement the variance and deferral account balances as early as January 1, 2021, given the economic forecasts?

(b) If so, has EGI developed any specific mitigation plans that might include the recovery of the variance and deferral account balances?

CME # 2

Ref: Exhibit B, Tab 3, Schedule 1, page 3 of 9

At Exhibit B, Tab 3, Schedule 1, page 3 of 9, EGI stated that the original high-level cost estimate for the upgraded tracking and reporting system for the EGD rate zone "was not fully reflective of the final project scope and schedule and did not take into account certain rate zone specific key elements."

(a) Please describe how the "one stop shop" element was not included in the original project scope, or was specific to the EGD rate zone. Was the decision to have all the information in one place made after the original scoping? Please describe fully.

(b) With respect to "Vendor delay", what is EGI's usual allocation of risk between itself and contractors? Was EGI entirely at risk for delays or failures on the part of the contractor, were holdbacks or other contractual mechanisms negotiated that would put the contractor at risk for delays?

CME # 3

Ref: Exhibit C, Tab 2, Schedule 1, page 92 of 141

At Exhibit C, Tab 2, Schedule 1, page 92 of 141, EGI's evidence is that the cumulative natural gas savings for the large volume scorecard are significantly lower than targets.

(a) What are the drivers of the relatively low savings amount in this segment relative to the metric target levels?

(b) Is EGI contemplating changes to this program as a consequence of these results, or does EGI anticipate further increases in natural gas savings like it did between 2016 and 2017 (60%)?

CME # 4

Ref: Exhibit B, Tab 2, Schedule 1, pg. 142 of 173 / Exhibit C, Tab 2, Schedule 1, pg. 128 of 141/ Exhibit B, Tab 2, Schedule 2, Page 19 of 23/ Exhibit C, Tab 2, Schedule 2, Page 19 of 22/

At various places in the evidence, EGI provided that spending on commercial and industrial programs as well as large volume programs are lower than budget.

(a) Please provide and describe the drivers of the underspending.

(b) Has EGI contemplated any changes to the Commercial/Industrial programs to bring spending levels closer to budget levels? If so, please describe them. If not, why not?

(c) Please describe the process used by EGI to determine where overspending (of up to 15% of the total OEB-approved budget) is allocated.