

Aiken & Associates

578 McNaughton Ave. West
Chatham, Ontario, N7L 4J6

Phone: (519) 351-8624

E-mail: randy.aiken@sympatico.ca

Sept. 17, 2020

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

Dear Ms. Long,

**RE: EB-2020-0067 - London Property Management Association Interrogatories for
Enbridge Gas Inc. – 2017-2018 DSM Deferral & Variance Accounts**

Please find attached the interrogatories of the London Property Management Association
in the above noted proceeding.

Yours very truly,

Randy Aiken
Aiken & Associates

c.c. EGI Regulatory Proceedings (e-mail only)

Enbridge Gas Inc.

**Application to dispose of balances in certain deferral and
variance accounts related to the delivery of conservation
programs in 2017 and 2018**

**INTERROGATORIES OF THE
LONDON PROPERTY MANAGEMENT ASSOCIATION**

Interrogatory #1

Ref: Exhibit A, Tab 2, Schedule 1, page 1

- a) Given that submissions are due October 28, 2020 and reply submission by EGI is due November 12, 2020, does EGI still believe the recovery of the deferral and variance account amounts can take place effective January 1, 2021? If not, does EGI believe that April 1, 2020 is a more realistic recovery date?
- b) Please calculate the bill impacts assuming an April 1, 2020 implementation, including interest costs.

Interrogatory #2

Ref: Exhibit A, Tab 2, Schedule 1 and EB-2019-0247 Decision and Order

EGI proposes to clear the balances to rates M1, M2, 01 and 10 in the Union rate zone over six months and through a one-time adjustment to all other Union rate zone rates classes and all rate classes in the EGD rate zone. In the EB-2019-0247 Decision and Order dated August 3, 2020, the OEB approved the disposition of federal carbon charge related accounts over three monthly installments for all rate classes in each of the EGD and Union rate zones. The Board also stated (page 16) that a consistent approach to the disposition of balances for each rate zone is preferable and that EGI should provide a proposal for aligning its approach for the EGD and Union rate zones as soon as practical.

Are there any impediments to EGI clearing the balances to all rate classes in both the EGD and Union rate zones over a three-month period? If so, please describe any such impediment fully.

Interrogatory #3

Ref: Exhibit A, Tab 3, Schedule 1, page 1

EGI has requested the approval of a rate mitigation plan as part of its October, 2020 QRAM application (EB-2020-0195) because of the increase in the gas commodity forecast of 25% or

more. Assuming EGI receives Board approval in time to implement the recovery of the DSM related account balances as part of the January, 2021 QRAM and if gas commodity costs remain high when that QRAM is filed, would EGI be willing to defer the recovery of the DSM related account balances to April 1, 2021 in order to mitigate significant rate increases for the winter months? If not, please explain fully.

Interrogatory #4

Ref: Exhibit A, Tab 3, Schedule 1, page 1

Is EGI able to have different disposition periods for the different rate classes in the Union rate zones? For example, could EGI dispose of the credit balances for rates M2, 01 and 10 over the January, 2021 through March, 2021 period, while delaying the recovery of the debit balance for rate M1 to April, 2021 through June, 2021?

Interrogatory #5

Ref: Exhibit C, Tab 3, Schedule 1, page 2

The evidence states (paragraph 7) that EGI did not transfer more than 30% of program budget funds between programs in either 2017 or 2018. However, Table 11.0 in Exhibit C, Tab 2, Schedule 1 shows that the actual 2017 spend was different from the 2017 budget by more than 30% for the residential program, the large volume program and the performance-based volume. Similarly, Table 4.10 in Exhibit C, Tab 2, Schedule 2 shows variances between 2018 actual and budget figures in excess of 30% for the residential program and the performance-based program.

a) Please reconcile the statement on page 2 of Exhibit C, Tab 3, Schedule 1 with the figures noted above.

b) Please explain fully how EGI determines the amounts noted in the “Budget Transfers” columns in each line in each of the tables referenced above. For example, how did EGI determine a budget transfer of \$2,060,148 for the residential program and (\$1,049,808) for the commercial/industrial program for 2017 in Table 11.0 of Exhibit C, Tab 2, Schedule 1?

c) Please confirm that if the budget transfers figures were re-allocated in a different manner, the impact on rate classes resulting from the DSMVA clearance would be different. If this cannot be confirmed, please explain fully.

Interrogatory #6

Ref: Exhibit C, Tab 3, Schedule 1

Has EGI changed any of the methodologies used to allocate any of the deferral and variance accounts to the rate classes in the Union rate zones? If yes, please explain the change and provide the rationale for the change.