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November 5, 2020 **VIA E-MAIL**

Christine E. Long
Registrar (registrar@oeb.ca)
Ontario Energy Board
Toronto, ON

Dear Ms. Long:

Re: Enbridge Gas Inc. (EGI) EB-2020-0134
Application for 2019 Earnings Sharing and Disposition of Deferral & Variance Account
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)

Please find attached the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

Mark Garner
Consultants for VECC/PIAC

Mark C Garner

Digitally signed by Mark C Garner
Date: 2020.11.05 14:32:33 -05'00'

Email copy:
Anton Kacicnik, Manager Rates, Regulatory Affairs
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For interrogatory clarifications please contact Mark Garner at 647-408-4501 or markgarner@rogers.com

REQUESTOR NAME	**VECC**
TO:	**Enbridge Gas Inc. (EGI)**
DATE:	**November 5, 2020**
CASE NO:	**EB-2020-0134**
APPLICATION NAME	**2019 Disposition of Deferral & Variance Account Balances**

VECC-1
Reference: Exhibit A, Tab3, page 3

• *For the Union rate zones, Enbridge Gas disposes of deferral balances prospectively for general service customers and as a one-time adjustment for in-franchise contract and ex-franchise rate classes.*

Enbridge Gas is currently not able to administer one-time adjustments for general service customers in the Union rate zones because of limitations in the system used to bill this group of customers

a) Which of these statements found at page 3 is true?

VECC-2
Reference: Exhibit B, Tab 3, Schedule 1, page 1

a) Please provide the equivalent combined Utility O&M table as on page 1, showing 2018 and 2019 actuals.

b) For the combined Utility revised O&M Table please include/identify all O&M amounts in each year which were payments/transfers to/from related companies (i.e. all outbound and inbound affiliate services).

c) Please show the incremental OM&A changes resulting from the change in capitalization policy separately.

VECC-3
Reference: Exhibit B, Tab 2, Schedule 3, page 1

a) Please provide the equivalent table: "*EGI Revenue from Regulated Storage & Transportation.*." showing both 2018 and 2019 actuals.

VECC-4
Reference: Exhibit B, Tab 2, Schedule 4

a) Please provide the equivalent table: "*EGI Utility Other Revenue and Other Income*" showing both 2018 and 2019 actuals.

VECC-5
Reference: Exhibit B, Tab 2, Schedule 4, page 2 of 15

a) Please amend Tables 2 (EGD and UG Rate Zones) to include 2018 actuals.

VECC-6
Reference: Exhibit B, Tab 2, Schedule 4, page 7 / Exhibit F, Tab 1, page 8

Enbridge Gas anticipates that mid-2021 is the earliest it will be able to adopt a common disposition period, as well as a common disposition approach between the EGD and Union rate zones once integrated systems and processes are implemented.

a) Please provide the capital investments made in each of 2019 and projected in 2020 for CIS infrastructure that are being made to allow common billing (including DVA dispositions) as between the two rate zones.
b) Does EGI anticipate that for its 2020 ESM and DVA balances it will be in the position to do a common disposition method that will allow options of one-time or periodic disposition by either customer volume or customer numbers?

VECC-7
Reference: Exhibit C, Tab 1, page 9-

a) What impact (if any) does the accounting change with respect to AOCI/Goodwill have on the calculation of EGI's 2019 income/earning sharing?
b) Is the change anticipated to have any impact of the calculation of EGI's income/earning sharing for 2020?

VECC-8
Reference: Exhibit D, Tab 1, pages 16-19 / Exhibit E, Tab 1, Pages 53-

a) EGI states that it "used the OEB's fiscal 2015 / 2016 cost assessment amount of $2.8 million (or an average of $0.7 million per quarter) as the comparator.." when calculating the OEBCAVA balances. Similarly, the amount of $2.5 million as approved for rates in 2013 was used as the comparator for the Union rate zone. For both of these rates zones what adjustment does EGI make in each year for inflation?
b) If no adjustment is made, please recalculate the balances shown in Table 1 if the comparator were inflated each year by the annual CPI (as reported by StatsCan)
c) If no adjustments are being made then it is correct to conclude that the OEBCAVA accounts are accruing variances in assessment costs that are due to all changes (forecast error, inflation etc.) that would have occurred and irrespective of whether the assessment methodology had changed?
d) What was the actual assessed annual OEB cost (net of any section 30 or equivalent other one-time costs) for Union in 2015, 2016, 2017 and 2018? Please provide the same information for Enbridge.

VECC-9
Reference: Exhibit E, Tab1, page 49

a) EGI explains the $0.744 million higher operating costs of the Dawn H/Lobo D/Bright compressor as "*a result of additional hours required being higher than planned.*" Please explain how many additional hours were required and for what purpose.

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