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November 6, 2020

Ms. Christine Long
Registrar
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Long,

**RE: EB-2020-0134 Enbridge Gas Inc.: Application for Approval to dispose of
Amounts recorded in certain 2019 Deferral Accounts and for approval of its
2019 Earnings Sharing Calculation**

Please find enclosed the interrogatories submitted on behalf of the Ontario Greenhouse Vegetable Growers.

If any further information is required, please do not hesitate to contact the undersigned.

Yours very truly,



Michael R. Buonaguro
Encl.

Enbridge Gas Inc.

2019 Deferral and Variance Account Disposition and Utility Earnings EB-2020-0134

OGVG INTERROGATORIES

November 5, 2020

OGVG-1

Ref: Exhibit E / Tab 1 / p. 43

Preamble: In Union's 2016 Rates Decision and Order (EB-2015-0116), the Board ordered the Company to establish the Unauthorized Overrun Non-Compliance Deferral Account to record any unauthorized overrun non-compliance charges incurred by interruptible distribution customers for not complying with a distribution interruption.

In 2019, three interruptions were called for a total of five days impacting 44 customers. Three customers did not comply, primarily because of technical issues. As a result, the balance in this deferral account is a credit to ratepayers of \$0.432 million, plus interest of \$0.014 million, for a total credit to ratepayers of \$0.446 million.

- a) Please confirm that all three customers mentioned in the evidence as not having complied with interruption requirements were charged the unauthorized overrun non-compliance charge rate for the duration of the interruption(s) they did not comply with.
- b) Please provide more details with respect to the behaviour of the three customers that did not comply with interruption requirements, i.e. how many of the three interruption requirements in 2019 applied to each of the three customers; did the three customers fail to comply with all interruption requirements that applied to them or did they comply during some interruption requirements and not others; when failing to comply with an interruption requirement did the three customers fail to comply for the duration of the interruption or only for part of an interruption?
- c) Please provide more detail with respect to the technical issues noted in the evidence, i.e. what was the nature of the issue in each case, and is it EGI's opinion that each customer had intended to comply with all interruption requests that applied to them but for the technical issues they experienced?

- d) Please quantify the actual cost of providing service to the three customers during the interruptions.
- e) Please explain whether it is feasible that the actual cost to provide service to interruptible customers that fail to comply with interruption requirements could be in excess of the unauthorized overrun charge, or whether in practice that charge will almost always if not always exceed the actual costs incurred to provide service during the interruption period.
- f) What is EGI's view with respect to the appropriateness of EGI having the discretion to waive the unauthorized overrun charge for customers who, despite having prepared to comply with interruption requirements and, possibly, a history of compliance (assuming they have been connected as an interruptible client during previous interruption periods) experience technical issues that temporarily prevent them from complying as it appears was the case in 2019, and instead charge them only the actual costs incurred to provide distribution service to them during the interruption?
- g) Please explain the specifics and rationale behind the proposed allocation of the credit in the Unauthorized Overrun Non-Compliance Deferral Account to customers; please also provide a reference for any previous OEB approval of the proposed allocation methodology.

OGVG-2

Ref: Exhibit A / Tab 3 / p. 3

Preamble: Consistent with the 2018 Deferral and Variance Account clearance proceeding (EB- 2019-0105), Enbridge Gas proposes to dispose of the deferral and variance accounts consistent with the practices of legacy EGD and Union.

- For the EGD rate zone, Enbridge Gas disposes of deferral balances as a one-time adjustment for both general service and contract rate classes.
- 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.

- a) Please confirm that, consistent with EGI's evidence in EB-2018-0300 at Exhibit C.OGVG.Union.1 part b) that for in-franchise contract customers for whom the proposed one time billing adjustment is unsuitable, that "Customers may contact their Account Manager to request alternative payment arrangements, for a maximum period of 6 months. These requests will be considered depending on the customers unique circumstances on a case by case basis."