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Our File # 339583-000279

By electronic filing

November 6, 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”)
2019 Earnings Sharing and Disposition of Deferral & Variance Account Balances
Board File #: EB-2020-0134**

Pursuant to Procedural Order No. 1 dated October 21, 2020, we submit the following Interrogatories for EGI on behalf of Canadian Manufacturers & Exporters (“CME”).

Yours very truly

A handwritten signature in blue ink, appearing to read 'Scott Pollock', is written over a light blue horizontal line.

Scott Pollock

enclosure

- c. Anton Kacicnik (EGI)
- David Stevens (Aird & Berlis LLP)
- EB-2020-0134 Intervenors
- Alex Greco (CME)

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ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an order or orders clearing certain commodity and non-commodity related deferral or variance accounts

**INTERROGATORIES OF
CANADIAN MANUFACTURERS & EXPORTERS (“CME”)
TO ENBRIDGE GAS INC. (“EGI”)**

CME # 1

Ref: Exhibit A, Tab 3, Page 3 of 4

At page 3 of 4 of the application, EGI stated that it proposed to dispose of the deferral and variance account balances as either a one-time adjustment or prospectively. The one-time adjustment would appear on the January, 2021 bill.

- (a) Has EGI considered any mitigation measures with respect to this application, given that the previous QRAM contained increases that required mitigation (for instance 25% increases to commodity prices and 10% total bill impacts), and EGI has applied for other amounts to be added to the January, 2021 bill, such as DSM related balances?
- (b) If the answer to a) is no, why not? If the answer is yes, please outline what measures were considered and why they were adopted or discarded.

CME # 2

Ref: Exhibit A, Tab 3, Page 4 of 4

At page 4 of 4, EGI stated “As Enbridge Gas is in the process of integrating internal systems and processes between legacy EGD and Union, Enbridge Gas is not able to introduce any further commonality to the disposition approaches at this time. A common approach could be proposed once integrated systems and processes are implemented.”

- (a) Does EGI forecast when the integrated systems and processes will be implemented?

CME # 3

Ref: Exhibit C, Tab 1, page 1 of 15

At page 1 of 15, EGI stated “The Company is no longer requesting clearance of the 2019 GSPCCDA, which has a balance of \$3.9 million that would have been collected from ratepayers. The balance will not be carried forward, and Enbridge Gas will not maintain the account in future years.”

- (a) Does EGI intend to collect that balance from ratepayers, either in this application or through another means? Please describe fully.

- (b) Is EGI seeking to close this account as part of this application? If not, please explain EGI's anticipated closure date for this account.

CME # 4

Ref: Exhibit E, Tab 1, page 6 of 61

At page 6 of 61, EGI stated that "the balance in this deferral account is a debit from ratepayers of \$12.122 million plus interest of \$0.166 million for a total debit from ratepayers of \$12.288 million." EGI also lists three reasons for the debit.

- (a) EGI has listed the value of the cancellation of the FT-RAM program. Does EGI have a sense of the magnitude of each of the other reasons listed in terms of its impact on the debit total in the account?
- (b) Does EGI see the changing market dynamics listed in reasons 2 and 3 as being short-term changes only, or will these variances from EGI's forecast persist throughout the rate-setting period?
- (c) To the extent that EGI's forecasts may be significantly different from the existing market, does EGI have any plans to apply for any changes with respect to this account, or simply allow the account to collect the variance?

CME # 5

Ref: Exhibit E, Tab 1, page 28 of 61

At page 28 of 61, EGI stated that unaccounted for gas costs were approximately \$6.5 million higher than what was already built into rates.

- (a) Does EGI know why UFG costs were nearly double the amount forecast? If so, please provide the drivers and any actionable steps EGI proposes to reduce UFG costs.
- (b) Does EGI anticipate increased UFG costs to persist throughout the rate-setting period?