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Dec. 18, 2020

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

Dear Ms. Long,

**RE: EB-2020-0181 - London Property Management Association Interrogatories for
Enbridge Gas Inc. Application for 2021 Rates – Phase 2**

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 for natural gas distribution rates and other
charges effective January 1, 2021**

**INTERROGATORIES OF THE
LONDON PROPERTY MANAGEMENT ASSOCIATION**

Interrogatory #1

Ref: Ex. B, Tab 2, Sch. 1

In paragraph 4, EGI states that the AMP reflects the EGI asset plan for the next five years, with assets for the EGD and Union rate zones being maintained separately for capital planning purposes through to the end of 2025.

- a) Is EGI maintaining separate rates bases for the EGD and Union rate zones through to the end of 2025? If not, why not?
- b) How does EGI allocate capital expenditures in the plan that are not necessarily rate zone specific such as the items included in general plant?

Interrogatory #2

Ref: Ex. B, Tab 2, Sch. 1, Tables 1 & 2

- a) What is the date of the forecast that is reflected in Tables 1 & 2?
- b) Please update the forecasts in Tables 1 & 2 to reflect the most recent information if this is not already included in the forecasts shown.
- c) Please provide a variance explanation between the 2019 actual shown in each of the tables to the 2019 forecast figures provided in EB-2019-0194 for each of the categories shown in the tables

Interrogatory #3

Ref: Ex. B, Tab 2, Sch. 1, page 17

What is the status of the approval sought for the London Line Replacement Project in EB-2020-0192?

Interrogatory #4

Ref: Ex. B, Tab 2, Sch. 1, page 31

- a) Is the proposed allocation for the London Line Replacement Project the same as the historical allocation of the London lines? If not, please explain any difference.
- b) If the proposed allocation referred to above is different from the allocation of the existing assets, please provide a table that shows the difference in the allocation of the costs by rate class.

Interrogatory #5

Ref: Ex. B, Tab 2, Sch. 1, page 31

- a) Is the proposed allocation for the Sarnia Industrial Line Reinforcement Project the same as the historical allocation of the Sarnia industrial line? If not, please explain any difference.
- b) If the proposed allocation referred to above is different from the allocation of the existing assets, please provide a table that shows the difference in the allocation of the costs by rate class.

Interrogatory #6

Ref: Ex. B, Tab 2, Sch. 1, App. A

- a) The footnotes indicate that overheads are included in project costs in years 2021-2025. Where are the overheads associated with the historical and 2020 forecast years shown?
- b) Please explain what is included in the \$30.9 2021 Budget for Improvements Other – Indirect in Table B and explain why it is significantly higher than in any of the previous years shown.
- c) Do the figures in Table D for Municipal Replacement reflect the gross or net capital additions associated with any contributions/payments related to municipal relocations/replacements? If the figures are gross (i.e. before any reductions from contributions/payments), please provide the gross capital additions and net capital additions for the years shown.

Interrogatory #7

Ref: Ex. B, Tab 2, Sch. 1, Table 2 & EB-2019-0194 - Ex. B, Tab 2, Sch. 1, Table 2

- a) In the current application, the total overhead shown for 2020 Forecast is significantly higher than for any of the historical years shown. Please explain the driver of this increase.
- b) In Table 2 in the EB-2019-0194 filing, the total overhead shown for all the forecast years was around \$80, including \$76.4 for the 2020 forecast. Please explain the increase in forecast total overhead for 2020 (\$76.4 to \$101.7) from EB-2019-0194 despite the total in-service additions being very similar, changing from \$528.3 in EB-2019-0194 to \$525.4 in the current filing.
- c) Has there been any change in the capitalization policy with respect to overheads in the Union Gas rate zones? If yes, please fully explain the changes that have taken place in 2020 as compared to previous years.

d) Please breakout the total overhead from the projects costs for 2021 through 2025 in Table 2 in the current filing.

Interrogatory #8

Ref: Ex. B, Tab 2, Sch. 1, App. F, page 2

a) Please explain fully how the 2021 distribution demand and other transmission forecasts have been derived.

b) Please explain why EGI is not using the 2013 Board approved distribution demand and other transmission design day demands to allocate the costs.

c) Is the EGD allocator shown on page 1 based on a 2021 forecast, or are the percentages shown for the delivery demand LP based on the last Board approved figures?

d) If the EGD allocator is based on the last Board approved figures and not on 2021 forecast, please provided a revised page 2 of Appendix F that shows the allocation to rate classes in the Union rate zone based on the figures used in the last cost of service rebasing application approved by the Board.

Interrogatory #9

Ref: Ex. B, Tab 2, Sch. 1, App. G

How has EGI forecast the volumes shown in Appendix G for 2021?

Interrogatory #10

Ref: Ex. B, Tab 2, Sch. 1

Please confirm that the bill impacts noted on page 32 are annual bill impacts.