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August 16, 2021

VIA E-MAIL

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

Dear Ms. Long:

**Re: EB-2021-0149 – Enbridge Gas Inc. (EGI) 2020 ESM/DVA Application
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

Email copy:

anton.kacicnik@enbridge.com
EGIRegulatoryproceedings@enbridge.com

REQUESTOR NAME	VECC
TO:	Enbridge Gas Inc. (EGI)
DATE:	August 16, 2021
CASE NO:	EB-2021-0149
APPLICATION NAME	2020/21 Earnings and 2019 DVAs

VECC -1

Reference: Exhibit B, Tab 1, Schedule 5, pages 1, 2

- a) Please confirm it is the effective debt cost rate which is used in the calculation of the Utility's rates of return/ESM calculations.
- b) Please explain why the total allocated debt interest shown in Schedule 5 page 2 of \$374.9 varies from the total debt interest and return shown in the Summary Schedule 5 page 1 of \$376.3 (375.3 + 1).

VECC -2

Reference: Exhibit B, Tab 1, Schedule 5, page 3

- a) Schedule 5, page 3 shows that the coupon rate for listed debentures differs from the effective cost rate. A number of the debentures vary significantly as between coupon and effective rate, specifically notes numbered: 1,5,9,10,13 (positive), 17,19, 22, and 24 where the difference is 30 basis points or more. Please explain for the significant higher (and in one case lower) effective cost of debt as compared to the coupon rate.

VECC -3

Reference: Exhibit C, Tab 1, page 14

EGI explains that: *"Effectively, Enbridge Gas is expected to fund such projects during the deferred rebasing period through synergies. In these circumstances, the Company does not believe it is appropriate to credit ratepayers for 100% of the accelerated CCA benefit associated with these projects through the Tax Variance Deferral Account."*

- a) Does an ICM approval results in a rate rider which incorporates the associated revenue requirement of capital project into rates?
- b) If that is true, then please explain how is that *"Enbridge is expected to fund such projects ...through synergies"*?
- c) Has EGI incorporated into its calculation of all its ICM projects approved by the Board the impact of accelerated CCA (AIIP)?
- d) If AIIP has not been incorporated into the calculation of the associated rate rider does EGI hold that the net impact of the accelerated in CCA should not be included in the TVDA?

VECC -4

Reference: Exhibit C, Tab 1, page 17

- a) The Board issued its Report on the Regulatory Treatment of Impacts Arising from the COVID-19 Emergency on June 17, 2021 subsequent to the filing of this application. Given the recent guidance from the OEB does EGI's proposal remain to not dispose of the COVID-19 deferral accounts at this time?

VECC -5

Reference: Exhibit D, Tab 1, page 1

- a) IS EGI proposing to close the TIACDA after the current proposed disposition of \$4.436 million?

VECC -6

Reference: Exhibit E, Tab 1, page 5

- a) Please provide the net revenues from upstream optimization in the Union rate zone for the years 2017 through 2019.
- b) What was the date of the elimination of the TransCanada FT-RAM program?

VECC -7

Reference: Exhibit F, Tab 1, page 5

- a) Please confirm that the EGI billing systems and process are, as anticipated for July 2021, capable of a common one-time billing adjustment.
- b) Please provide a sample common EGI bill.

VECC -8

Reference: Exhibit G, Tab 1, page 5

EGI explains that it is continuing to work to meet the 100% requirement for the "Time to Reschedule Missed Appointments" (TRMA) which currently is at 97.3%.

- a) What is the most common reason rescheduling is not completed within the 2-hour time frame?
- b) Is the 100% requirement a reasonable expectation based on actual practice?

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