



**BY EMAIL and RESS**

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Ontario Energy Board  
2300 Yonge Street  
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Toronto, Ontario  
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August 18, 2021  
Our File: EB20210147

**Attn: Christine Long, Registrar**

Dear Ms. Long:

**Re: EB-2021-0147 – Enbridge Gas Inc. 2022 Rates – SEC Interrogatories**

We are counsel to the School Energy Coalition ("SEC"). Attached, please find a copy of SEC's interrogatories in the above-captioned matter.

Yours very truly,  
**Shepherd Rubenstein P.C.**

Fred Zheng

cc: Ted Doherty, SEC (by email)  
Applicant and intervenors (by email)

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998,  
S.O. 1998, c.15, Schedule B, as amended;

**AND IN THE MATTER OF** an Application by Enbridge Gas Inc., pursuant to section 36(1) of the *Ontario Energy Board Act, 1998*, for an order or orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission and storage of gas as of January 1, 2022.

**INTERROGATORIES  
ON BEHALF OF THE  
SCHOOL ENERGY COALITION**

**SEC-1**

[B-1-2, p.8-9] With respect to alternatives to reduce or eliminate the PDO, Enbridge states: “At this time, Enbridge Gas has not acted on or reflected the lower cost market-based alternative in this application. In order to pursue the market based alternative Enbridge seeks direction from the OEB to secure the offered firm exchange capacity.” [emphasis added]

- a. Is Enbridge seeking direction from the OEB in this proceeding? If not, please explain why and what proceeding it will seek direction from the OEB.
- b. What approvals are required by the OEB to implement the lower cost-market based alternative for a reduction (as opposed to elimination) of the PDO?
- c. Please confirm that based on the table provided, implementation of a market-based solutions for 37 TJ/d would result in a savings to customers of \$13.3M (14.7-1.5 from Table 2)?

**SEC-2**

[D-2-13, P.1] Please explain your assumption that the Normalized Average Consumption (“NAC”) Adjustment trend from 2019 to 2020 would be comparable to the change from 2021 to 2022 and the descending trend of NAC would continue.

Respectfully submitted on behalf of the School Energy Coalition this August 18, 2021.

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Fred Zheng  
Counsel for the School Energy Coalition