

**Enbridge Gas
EB-2021-0147
2022 Rates**

Interrogatories of Environmental Defence

Interrogatory # B-ED-1

Reference: Exhibit B, Tab 1, Schedule 2, Page 9

Preamble:

“In order to pursue the market based alternative Enbridge seeks direction from the OEB to secure the offered firm exchange capacity.”

Questions:

- (a) Is Enbridge seeking direction from the OEB in this proceeding as to whether to secure the offered firm exchange capacity as described above?
- (b) Is the question of whether to secure the offered firm exchange capacity as described above within the scope of what the OEB could direct in this proceeding as understood by Enbridge?

Interrogatory # B-ED-2

Reference: Exhibit B, Tab 1, Schedule 2

Questions:

- (a) Please provide a table showing the PDO (TJ/day) from 2010 to today.
- (b) Please provide a table showing the annual PDCI from its inception to today.
- (c) Page 1 states: “Direct purchase customers in the Union South rate zone are obligated to deliver gas to Enbridge Gas at various receipt points upstream or on Enbridge Gas’s system, including the interconnect with TCPL at Parkway.” Does this mean that these customers are in effect required to purchase gas that is delivered through the TCPL mainline or other non-Dawn-Parkway routes? If not, please explain and quantify.
- (d) Page 2 states: “As a result of the current obligated Parkway deliveries by direct purchase customers and sales service customers, Enbridge Gas’s Dawn-Parkway system is physically smaller than it otherwise would be.” Is that because the obligated Parkway deliveries take a different transmission pathway (e.g. the TCPL mainline)? If not, please explain.
- (e) Do customers subject to the PDO subsidize other customers because they are required to use transmission pathways that are more expensive than the Dawn-Parkway pathway? If not, please explain.
- (f) Is the PDCI meant to address inequities by compensating customers subject to the PDO for the benefits they provide to the system and/or the cost of providing those benefits? If

not, please explain. If yes, please describe the degree to which the PDCI fully compensates those customers.

- (g) As the PDO is reduced, how is this reduction allocated between customers who are subject to the PDO?

Interrogatory # B-ED-3

Reference: Exhibit B, Tab 1, Schedule 2

Questions:

- (a) Once a customer's PDO has been reduced by Enbridge, please describe any barriers (contractual, regulatory, market, financial, etc.) to re-subjecting that customer to the PDO and the changes that would be necessary to overcome those barriers.
- (b) If the PDO and PDCI are reduced, can they later be increased as an alternative to an infrastructure project intended to increase the Dawn-Parkway system capacity? If not, please describe all barriers and the changes that would be required to remove them.
- (c) As the PDO is reduced, is available capacity to ship from Empress shifted to serve deliveries at Dawn, such that capacity to ship along the TCPL mainline to Parkway is reduced? If not, please explain.
- (d) In other words, will the reduction of the PDO potentially reduce the ability to deliver to Parkway outside of the Dawn-Parkway system? If not, please explain.

Interrogatory # B-ED-4

Reference: Exhibit B, Tab 1, Schedule 2

Questions:

- (a) Please provide a map (or maps) of Ontario's gas transmission pipelines that shows the flows in and out of Ontario on each line before and after the efforts that Enbridge has made to reduce the PDO.
- (b) Please provide a map (or maps) of Ontario's gas transmission pipelines that shows the available capacity (TJ/d) on each transmission line before and after the efforts that Enbridge has made to reduce the PDO.

Interrogatory # B-ED-5

Reference: Exhibit B, Tab 1, Schedule 2

Questions:

- (a) Has the PDO been reduced primarily through turnback? If not, please explain.
- (b) How much of the turnback that has made PDO reductions possible has been from in-franchise versus ex-franchise customers (in TJ/d)?

- (c) What is the total TJ/day of all contracts to ship gas to the northeastern United States through the Dawn-Parkway system?
- (d) Could the PDO be reduced by not renewing contracts to ship gas to the northeastern United States through the Dawn-Parkway system? If not, please describe all barriers and the changes that would be required to remove them.
- (e) Is the PDCI charged to ex-franchise customers?
- (f) Could the PDCI be shifted to ex-franchise customers? If not, please describe all barriers and the changes that would be required to remove them.

Interrogatory # B-ED-6

Reference: Exhibit B, Tab 1, Schedule 2, Page 8

Questions:

- (a) Please express the comparison of the options in Table 2 as a single NPV figure for each option. Please use a timeframe that Enbridge believes is appropriate (40 years?).
- (b) Please express the comparison of the options in Table 2 in cost/capacity for each option, both gross and NPV.

Interrogatory # B-ED-7

Reference: Exhibit B, Tab 1, Schedule 2, Page 7

Questions:

- (a) Please explain the market based alternative in more detail.
- (b) Please explain the financial rationale for the entity that bid for 37,000 Gj/d and the pathway that entity is likely to use to fulfill that obligation.

Interrogatory # B-ED-8

Reference: Exhibit B, Tab 1, Schedule 2, Page 8

Questions:

- (a) Could the PDO be reduced by reducing demand on the Dawn-Parkway system through energy efficiency programs or fuel switching programs?
- (b) Will Enbridge be considering methods to reduce PDO through demand side management? If yes, when will that occur?