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August 18, 2021

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto ON
M4P 1E4

Dear Ms. Long

**RE: EB-2021-0147 Enbridge Gas Inc. 2022 Rates Phase 1 Application
Energy Probe Interrogatories**

Attached are the interrogatories of Energy Probe Research Foundation (Energy Probe) in the EB-2021-0147 proceeding, Phase 1 of the application by Enbridge Gas Inc. to the Ontario Energy Board for the approval of its 2022 rates.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.
Consultant representing Energy Probe

cc. Roger Higgin (Sustainable Planning Associates Inc.)
Petar Prazic (OEB Staff)
Ian Richler (OEB Staff)
Rakesh Torul (Enbridge Gas Inc.)

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ONTARIO ENERGY BOARD

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

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.

EGI 2022 Rates Phase 1

**Energy Probe Research Foundation
Interrogatories**

August 18, 2021

EB-2021-0147
EGI 2022 Rates Phase 1
Energy Probe Research Foundation
Interrogatories

B-EP-1

References: Exhibit B, Tab 1, Schedule 1 Page 11 Plus Appendices; Exhibit D, Tab 1, Rate Order, Working Papers, Schedule 10; Exhibit D, Tab 2, Rate Order, Working Papers, Schedule 13; EB-2020-0095 Exhibit I.EP.1 Page 1 -12

- a) Please provide updates to the tables and charts in EB-2020-0095 Exhibit I.EP.1 Page 1 -12 showing 2020 actuals 2021 E and 2022 forecast.
- b) Please provide a discussion for each rate class
 - i. Changes in 2020 actuals
 - ii. 2021 YTD trends and Covid-19 impacts
 - iii. 2022 forecast
 - iv. Specifically the drivers for -1.4% AU decrease for EGD Rate 1 and -1.7 % for Union RZ M1. Is it due to price or other factors?

B-EP-2

References: Exhibit B, Tab 1, Schedule 1 Page 11 para 29 and 30; Exhibit D, Tab 1, Rate Order, Working Papers, Schedule 10; Exhibit D, Tab 2, Rate Order, Working Papers, Schedule 13; EB-2020-0095 Exhibit I.EP.2 Attachment 1 Pages 1 - 10

- a) Please update EB-2020-0095 Exhibit I.EP.2 Attachment 1 Pages 1 - 10 to show the derivation of the 2022 forecast Budget Degree Days for each of the 3 DD Zones.
- b) Discuss if each of the Preferred DD Methodologies still produce the best result compared to the other options.

B-EP-3

References: Exhibit B, Tab 1, Schedule 1 Plus Appendices Page 3 Table 1 and paragraphs 53 and 54; Exhibit D, Tab 2, Rate Order, Working Papers Schedule 1 Page 1; Exhibit D, Tab 2 Rate Order Working Papers Schedule 5.
EB-2020-0095, Exhibit D, Tab 2, Rate Order, Working Papers, Schedule 5, column (j).

Preamble: We would like to better understand the increase in Revenue Requirement and resulting increases in residential rates and bill impacts for Union North and Union South (~2200 m3)

- a) Please confirm from comparison of Revenue Requirement increases that the major difference between EGD and Union Rate Zones are the 2021 Capital Pass-Through and the PDO Charge.
- b) Please provide a schedule or schedules for Rates R01, and M1 that shows how the \$2.956 million and \$8.008 million overall increase in the 2021 RR for these classes is derived/allocated and results in the rate increases in excess of \$10.42 and \$8.71 per year respectively.

B-EP-4

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

Preamble: “Enbridge Gas has assessed the alternatives to reduce or eliminate the PDO as described above in response to the 2021 Rates settlement proposal. Infrastructure alternatives are more costly than the current PDCI cost. Market-based alternatives are slightly less costly than the current PDCI alternative but does not provide sufficient capacity to provide a full reduction of the PDO. *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.”

- a) Please confirm that EGI has rejected market-based solutions in previous proceedings. Why has EGI decided to pursue these at this time?
- b) Please provide a listing of the responses to the RFP with names omitted. Include volumes, price and other conditions such as term etc.
- c) When must EGI accept/reject the offers for November 2022 implementation?
- d) Why has EGI not proceeded expeditiously to get OEB approval before now?
- e) Based on accepting the full 37,000 Gj/d, what would be the expected annual reductions in the PDO and PDCI over the 5 year term? November 2022 –November 2027?
- f) Will EGI extend the term of the Exchange(s) and if so, under what circumstances?

B-EP-5

References: Exhibit B, Tab 1, Schedule 1, Page 12, and Exhibit D, Tab 2, Rate Order Working Papers, Schedule 14, Page 1

Preamble: “Enbridge Gas has updated the capital pass-through projects to reflect the 2022 revenue requirement of each project consistent with the rate treatment in past years.”

- a) Please explain how Enbridge updated the capital pass-through projects that resulted in the increase in the revenue requirement.
 - b) Please file a table showing the calculation of the 2022 revenue requirement of each capital pass-through project.
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Respectfully submitted on behalf of Energy Probe by its consultants,

Roger Higgin
SPA Inc.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.