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December 16, 2021

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

Dear Ms. Long,

RE: EB-2021-0148 - London Property Management Association Notice of Intervention and Request for Cost Eligibility Determination – Enbridge Gas Inc. – 2022 Rates (Phase 2 – Incremental Capital Module)

Please find attached the interrogatories of the London Property Management Association in the above noted proceeding. LPMA has reviewed the interrogatories of Board Staff that were filed earlier today and have removed any duplicated questions.

Yours very truly,

Randy Aiken
Aiken & Associates

c.c. EGI, Regulatory Affairs

Enbridge Gas Inc.

Application for Natural Gas Distribution Rates and Other
Charges Effective January 1, 2022 – Phase 2

**INTERROGATORIES OF THE
LONDON PROPERTY MANAGEMENT ASSOCIATION**

Interrogatory #1

Ref: Exhibit B, Tab 2, Schedule 1, Table 8

Have the growth factors calculated in Table 8 been calculated using the same methodology as in previous ICM applications? If not, what has changed?

Interrogatory #2

Ref: Exhibit B, Tab 2, Schedule 1, Appendix F, page 2

Please confirm that the allocation of the projects shown for the Union rate zones is the same for the new assets as it was for the assets being replaced. If not confirmed, please explain the change and provide a table showing the difference between the proposed allocation and the previous allocation methodology.

Interrogatory #3

Ref: Exhibit B, Tab 2, Schedule 1, Attachment 1, Table C

In line 1 of Table C, should “2021 In-Service Capital Forecast” be “2022 In-Service Capital Forecast”?

Interrogatory #4

Ref: Exhibit B, Tab 2, Schedule 1, Table 10

In line 1 of Table 10, should “2021 In-Service Capital Forecast” be “2022 In-Service Capital Forecast”?