November 17, 2021

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

Dear Ms Long:

EB-2021-0148 – Enbridge Gas Inc. – 2022 Rates – Incremental Capital Module

Please find, attached, interrogatories on behalf of the Consumers Council of Canada for Enbridge Gas Inc. pursuant to the above-referenced proceeding.

Please feel free to contact me if you have questions.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: All parties

INTERROGATORIES FROM ENBRDGE GAS INC.

FROM THE CONSUMERS COUNCIL OF CANADA

RE: EB-2021-0148 - ENBRIDGE GAS INC. 2022 RATES

CCC-1

Ex. B//T2/S1/p. 3

Please explain what relief, if any, EGI is seeking from the OEB with respect to the Asset Management Plan Addendum.

CCC-2

Ex. B/T2/S1/pp. 4-6

Please recast Tables 1 and 2 (Capital Expenditures by Category - 2017-2026 – EGD and Union Rate Zones) and include budget amounts for 2017-2020.

CCC-3

Ex. B/T2/S1/p. 24

Please explain how EGI selected the eligible ICM capital projects included in this Application. Please indicate if any projects were deemed ineligible and why?

CCC-4

Ex. B/T2/S1/p. 28

Please indicate when EGI identified the need to replace approximately 650 m of the existing NPS 42 Dawn to Cuthbert pipeline. Please identify any factors that might put the September 2022 in-service date at risk. Why does EGI require a 2022 in-service date?

CCC-5

Ex. B/T2/S1/p. 28

Please indicate when EGI identified the need to rebuild the Byron Transmission Station located in Byron Ontario. Please identify any factors that might put the August 31, 2022 in-service date at risk. Why does EGI require a 2022 in-service date?

CCC-6

Ex. B/T2/S1/p. 29

Please indicate when EGI identified the need to replace the existing NPS 4 Kirkland Lake Lateral. Please identify any factors that might put the November 2022 in-service date at risk. Why does EGI require a 2022 in-service date?

CCC-7

Ex. B/T2/S1/p. 1 and p. 30

EGI is requesting ICM funding that results in a total revenue requirement for 2022 of \$10.8 million. EGI received approval of ICM funding in 2019, 2020 and 2021. For each of those years please set out the following:

- a) The amount of ICM funding approved for each project;
- b) The associated revenue requirement impact of each project;
- c) The actual capital expenditures;
- d) The projected in-service date for each project; and
- e) The actual in-service date for each project.