Aiken & Associates
578 McNaughton Ave. West
Chatham, Ontario, N7L 4J6

Phone: (519) 351-8624
E-mail: randy.aiken@sympatico.ca

July 25, 2022

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Marconi,

RE: EB-2022-0110 - London Property Management Association Interrogatories to Enbridge Gas Inc. – 2021 Utility Earnings and Disposition of Deferral & Variance Account Balances

As per the Ontario Energy Board's Procedural Order No. 1 dated July 18, 2022, please find attached the interrogatories of the London Property Management Association ("LPMA") in the above noted proceeding.

LPMA is filing its interrogatories well in advance of the August 9, 2022 as set out in Procedural Order No. 1 in order to assist other parties in reducing duplication of interrogatories.

Yours very truly,

Randy Aiken

Digitally signed by Randy Aiken
DN: cn=Randy Aiken, o=Aiken & Associates, ou,
email=randy.aiken@sympatico.ca, c=CA
Date: 2022.07.25 10:10:49 -04'00'

Randy Aiken
Aiken & Associates

c.c. EGI, Regulatory Affairs
Intervenors

Enbridge Gas Inc.

Application for Disposition of Deferral and Variance Account Balances and Review of 2021 Utility Earnings

INTERROGATORIES OF THE LONDON PROPERTY MANAGEMENT ASSOCIATION

Interrogatory #1

Ref: Exhibit A, Tab 3, Appendix A

a) Please indicate the prescribed interest rate(s) used for each quarter of 2022 in calculating the interest costs shown in the table.

b) If required, please update the table to reflect the use of the most current OEB approved prescribed interest rates for each quarter, assuming that the prescribed rate for the fourth quarter of 2022 is equal to that of the third quarter of 2022.

Interrogatory #2

Ref: Exhibit B, Tab 1, Page 3

a) What is the gross revenue sufficiency for 2021 based on the OEB approved formula return on equity of 8.34%?

b) What is the magnitude of the net and gross revenue deficiency of a 100-basis point difference in the return on equity for 2021?

Interrogatory #3

Ref: Exhibit B, Tab 1, Pages 4 & 5

Has EGI made and changes to the process related to the calculation of the return on equity from that used for 2020 and 2019? If there are any changes, please explain fully the change and the reason for the change.

Interrogatory #4

Ref: Exhibit B, Tab 1, Schedule 4

a) Please explain the meaning of a negative number under additions to gross plant. For example, line 53 on page 4 shows (23.6) for additions to measuring and regulating equipment for Union rate zones underground storage plant.

b) Please explain why the average of monthly averages shown on line 102 ,sub-total Union rate zones general plant of $437.6 is higher than both the opening balance of $418.6 and the closing balance of $419.5. Is this related to the timing of the retirements compared to the timing of the additions?

c) Please explain the timing associated with the retirement of an asset such as computers shown on line 95 of $69.1 relative to the additions shown of $53.0.

d) Please explain how adjustments to accumulated depreciation are impacted for each of (a), (b) and (c) above.

Interrogatory #5

Ref: Exhibit B, Tab 2 Schedule 2, page 2 & Exhibit B, Tab 1, Schedules 1 & 2

Please provide versions of Schedules 1 & 2 in Exhibit B, Tab 1 that reflect the normalized total utility revenue of $4,640.1 shown on page 2 of Exhibit B, Tab 2, Schedule 2 and show the resulting normalized actual return on equity for 2021.

Interrogatory #6

Ref: Exhibit B, Tab 3, Schedule 1

Paragraph 10 notes that one of the drivers of the increase in outside services in 2021 is related to increases in regulatory consulting costs related to rebasing preparations. Please quantify these costs and confirm that these costs will not be recoverable in the upcoming rebasing application.

Interrogatory #7

Ref: Exhibit F, Tab 1

Paragraph 8 states that consistent with the TVDA, EGI has split the debit balance of $0.058 million in the 2021 IRP Operating Cost Deferral Account balance between the EGD and Union rate zones in proportion to the 2018 actual rate base for each rate zone. Footnote 3 then references page 16 of the EB-2020-0134 Decision and Order dated May 6, 2021.

a) Please indicate the specific reference in the EB-2020-014 Decision and Order that deals with the allocation of the IRP Operating Cost Deferral Account.

b) Is this the first year that the balance in the account is being allocated and disposed of?

c) Did EGI consider any method of allocating these operating costs other than based on historical rate base? If not, why not?

Interrogatory #8

Ref: Exhibit F, Tab 3, Schedule 1 & 5

a) Please explain the difference in the M1 unit rate of 0.7547 for sales/system gas and 0.4169 for bundled t-service shown in line 11 of Exhibit F, Tab 3, Schedule 1 and the figures shown on lines 1 through 3 (0.0870 delivery, 0.3378 commodity, 0.4248 sales service impact) on page 1 of Exhibit F, Tab 3, Schedule 5.

b) Please explain the difference in the M2 unit rate of 1.5045 for sales/system gas and 1.1667 for bundled t-service shown in line 12 of Exhibit F, Tab 3, Schedule 1 and the figures shown on lines 15 through 17 (0.5105 delivery, 0.3378 commodity, 0.8483 sales service impact) on page 1 of Exhibit F, Tab 3, Schedule 5.

Interrogatory #9

Ref: Exhibit F, Tab 1 & Exhibit F, Tab 3, Schedule 3 & Exhibit E, Tab 1

Paragraph 14 in Exhibit F, Tab 1 states that the allocation of account balances to customer classes use the same methodologies approved by the OEB in previous years with the exception of the Deferral Clearing Variances Account (179-132) ("DCVA") in the Union rate zone.

Paragraph 15 in Exhibit F, Tab 1 states that EGI proposes to split the DCVA balance between general service and contract customers and that the allocation of general service and contract customer balances to rate classes is based on respective volumes. The evidence then refers to Exhibit F, Tab 3, Schedule 3 for the proposed allocation.

Line 8 of Exhibit F, Tab 3, Schedule 3 shows credits for general service classes for the DCVA and debits for the contract rate classes, but does not explain how this is arrived at.

a) Please provide a table that shows the calculations and allocation factors used to arrive at the allocation of the DCVA balance to the rate classes.

b) Please explain fully, how the composition of the DCVA balance discussed in Exhibit E, Tab 1, page 21, impacts the allocation of the amounts to the various rate classes, if at all.

Interrogatory #10

Ref: Exhibit G, Tab 1

a) Please provide the number of customers for each of 2019, 2020 and 2021 that were contacted to reschedule work used in the calculation of the TRMA as noted in paragraph 4.

b) Please provide the number of meters for each of 2019, 2020 and 2021 with no reads for four consecutive months used in the calculation of the MRPM as noted in paragraph 5. Please also provide the number of active meters to be read for the same years.

c) Please provide the number of calls received for each of 2019, 2020 and 2021, along with a monthly breakdown of the number of calls received for each year used in the calculation of the CASL as noted in paragraph 6.

d) Please provide the number of callers that hung up while waiting for a live operation in each of 2019, 2020 and 2019 used in the calculation of the abandon rate as noted in paragraph 7.