MICHAEL R. BUONAGURO

Barrister and Solicitor

24 HUMBER TRAIL
TORONTO, ONTARIO, M6S 4C1
P: (416) 767-1666
F: (416) 767-1666
EMAIL: mrb@mrb-law.com

August 9, 2022

Ms. Nancy Marconi
Registrar
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Marconi,

RE: EB-2022-0110 Enbridge Gas Inc.: Application with respect to certain 2021 Deferral Accounts and for approval of its 2021 Earnings Sharing Calculation

Please find enclosed the interrogatories filed on behalf of the Ontario Greenhouse Vegetable Growers in the above noted proceeding.

If any further information is required, please do not hesitate to contact the undersigned.

Yours very truly,

Michael R. Buonaguro
Encl.

Enbridge Gas Inc.

2021 Deferral and Variance Account and Utility Earnings Application
EB-2020-0110

OGVG INTERROGATORIES

August 9, 2022

OGVG-1

Ref: Exhibit C / Tab 1 / pp. 4, 8, 9, 10, 11
EB-2021-0149 Exhibit C Tab 1 Page 4
EB-2020-0134 Exhibit C Tab 1 Page 5

Preamble: *Pension Expense – Unamortized Actuarial Gains/Losses and Prior Service Cost*

Prior to December 31, 2018, Union recorded actuarial gains/losses and past service costs (Actuarial Losses) in Accumulated Other Comprehensive Income (AOCI) and amortized the balance over the expected average remaining service life (EARSL) of employees in accordance with ASC 715-30-35-24. This amortization expense was part of pension cost that was recognized annually and included in the forecast that underpinned rates. (emphasis added)

Approximately $39 million of Actuarial Losses were amortized between February 27, 2017 and December 31, 2018, resulting in a balance of $211 million remaining in Union's AOCI at amalgamation (the Amalgamation) (January 1, 2019).

As noted in the EB-2020-0134 Interrogatory Response to LPMA, the amortization of actuarial gains/losses and past service costs is a component of accrual-based pension expense. Base rates for both the EGD and Union rate zones include a provision for accrual-based pension expenses as part of O&M. (emphasis added)

The Pension Expense drawdown against the APCDA for 2021 has been calculated by EGI to be $12,033,400.

The Pension Expense drawdown for 2019 and 2020 were calculated by EGI to be $17,509,000 and $12,288,000 respectively.

a) Please explain how EGI calculates the amount to be drawn down against the APCDA as annual pension related amortization expense included in rates.

b) Please explain why the amount drawn down against the APCDA as annual pension related amortization expense included in rates appears to be declining (i.e. from $17.509M in 2019 to $12.033M in 2021).

OGVG-2

Ref: Exhibit E / Tab 1 / p. 58

Preamble: *Accounts with A Zero Balance-Union Rate Zones*

Unauthorized Overrun Non-Compliance Account

a) Is there no balance in the Unauthorized Overrun Non-Compliance Account for 2021 because there were no interruptions in 2021, or because there were no unauthorized overruns during interruptions in 2021? If the latter, please provide a summary of the interruptions (location and duration) experienced by EGI in the Union Rate Zone in 2021.