

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, 3 Schedule B, as amended (the “OEB Act”);

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an order or orders clearing certain commodity and non-commodity related deferral or variance accounts.

**INTERROGATORIES
FROM THE
SCHOOL ENERGY COALITION**

B-SEC-001

[Exhibit B, Tab 3, Schedule 1, p. 2, 3] Corporate Shared Services have increased by 16.1% from 2020 to 2021. With respect to CSS, please provide:

- a) A complete breakdown of CSS charges, by category, for each of 2019 through 2021, with explanations of all variances in excess of 5% from year to year.
- b) The most recent breakdown of all CSS charges in the Enbridge Inc. group of companies, with explanations of how those charges have been allocated between affiliates (e.g. based on FTEs, rate base, etc.)
- c) A full list of all OM&A and capital costs in 2021 in categories other than CSS that have been reduced due to increases in CSS charges, with a comparison of the reduction and the related CSS increase and an explanation of any anomalies (such as changes in service levels).
- d) The current agreement between Enbridge Inc. (or any other affiliate providing CSS) and the Applicant with respect to CSS charges.
- e) The full calculation of all stock-based compensation charges allocated to the Applicant for each of 2019, 2020, and 2021.

B-SEC-002

[Ex. B/3/2, p. 13, 14] Please provide the internal capital plan on which the capital spending in 2021 was based, including all narrative materials and explanations, and all presentations to

executive management or the board of directors dealing with the increases in capital spending from 2020 to 2021.

C-SEC-003

[Ex. C/1, p. 4] In July 2021 a class action lawsuit #CV-21-00658687-00CP was filed in the Ontario Superior Court of Justice seeking a range of relief over a period of more than 30 years for under-calculations of pensions. With respect to this issue, please:

- a) Confirm that no amounts have been included in any deferral or variance accounts related to this lawsuit.
- b) Provide the amount that is included in the OM&A calculation for 2021 relating to this lawsuit.
- c) Provide the Applicant's most recent estimate of the amount potentially at risk if the lawsuit is successful, and confirm that the Applicant expects to include any eventual cost associated with this lawsuit in rates in the future.
- d) Confirm that the practices alleged in the lawsuit to be wrongful (failure to include maternity and parental leave periods in credited service for pension calculation purposes) have, to the extent that they were in fact in place prior to amalgamation, continued since the amalgamation or, if not confirmed, describe what changes have been made to those practices since amalgamation. This question does not seek an admission of fact or interpretation, but only information on whether what was happening before amalgamation continued after amalgamation.
- e) Confirm that the practices alleged in the lawsuit to be wrongful were the same practices that were in place at Union Gas for the period 1990 to 2018 or, if not confirmed, describe how those practices were different at Union Gas. Again, not admission is requested, only a comparison of practices between the two utilities.
- f) If similar practices were in place at Union Gas, provide the Applicant's most recent estimate of the amount potentially at risk if a similar lawsuit against Union Gas were to be successful, and confirm that the Applicant expects to include any eventual cost associated with any such lawsuit in rates in the future.

E-SEC-004

[Ex. E/1, p. 15] Please provide any internal reports, analyses, memoranda, or other documents disaggregating the changes in normalized average consumption in Rates 01 and/or M1 between residential and non-residential customers.

E-SEC-005

[Ex. E/1, p. 24] Please provide more detail on the “billing systems’ inability to locate all intended customers”, and describe how that problem results in the ratepayers being responsible for the shortfall in collection.

E-SEC-006

[Ex. E/1, p. 31] Please provide a detailed explanation of the steps taken by the Applicant to identify the specific causes of the large, \$35.9 million UFG charges. Please provide any internal reports, analyses, memoranda, or other documents dealing with those steps, and/or reporting on the results.

E-SEC-007

[Ex. E/1, p. 46] Please provide any internal reports, analyses, memoranda, or other documents dealing with the 52% increase in OM&A costs set out in Table 2, and provide an explanation of what steps were taken by the Applicant to minimize those cost overruns.

F-SEC-008

[Ex. F/1, p. 3] Please explain why the spending on IRP in 2021 was so low, and reconcile that low spending with the criticisms of the members of the IRP Working Group about the slow start of the Applicant to meeting its IRP obligations.

H-SEC-009

[Ex. H/1, p. 27-37] Please confirm that the Applicant does not believe the role of the IRP Working Group includes providing input to the Applicant on load and demand forecasting as it relates to the energy transition, nor input on asset management planning activities other than those relating to specific IRP projects.

Respectfully submitted on behalf of the School Energy Coalition, this August 9, 2022.

Jay Shepherd
Counsel for the School Energy Coalition