

**REF:** Exhibit B, Tab 1, Schedule 2, Page 1

Preamble: Under footnote iv), the line item states: “ *Adjust EGD rate zone OBA costs to reflect EB-2013-0099 approved unit costs agreed to be used for determining net revenue*”.

We would like to understand this adjustment.

- 1) Please provide a description of the adjustment
  - a) Please provide a breakdown of component costs and the resulting determination of the \$4.3M figure.

**REF:** Exhibit B, Tab 1, Schedule 4, Page 3

Preamble: In the EGD Rate Zone Underground Storage Plant table, column 2 provides additions in the total of \$73.8M.

We would like to understand the nature of these additions and the allocation to utility storage plant.

- 2) For each project over a million dollars that contribute to the additions, please provide:
  - a) A description of the project
  - b) A Board approval reference, if any
  - c) A specific description of the functionality created, improved or replaced as a result of the capital invested

**REF:** Exhibit B, Tab 1, Schedule 4, Page 4

Preamble: In the Union Gas Rate Zone Underground Storage Plant table, column 2 provides additions in the total of (\$12.1M).

We would like to understand the nature of these changes and the allocation to utility storage plant.

- 3) For each project over a million dollars in absolute value that contribute to the total for additions, please provide:
  - a) A description of the project
  - b) A Board approval reference, if any
  - c) A specific description of the functionality created, improved or replaced as a result of the capital invested

**REF:** Exhibit B, Tab 2, Schedule 3 and EB-2020-0149 Exhibit I.FRPO.13

Preamble: We would like to understand the cost changes and source of inter-legacy company transactions.

- 4) For line 21, please break-out the aggregate transactions between legacy EGD and UG into the respective lines 9 to 19 similar to FRPO. 13 from last year providing the last 3 years including 2021.
  - a) Please provide a description of M16 service transactions between legacy companies and drivers for differences over time.
  - b) Please provide a description of S&T Transport Carbon Facility Collection transaction between legacy companies and drivers for differences over time.

**REF:** Exhibit B, Tab 3, Schedule 1, Tables and Appendix

Preamble: We would like to understand the changes in O&M as the relate to integration including Corporate Shared Services and EGI's request to eliminate Appendix A.

- 5) For line 13 of Table 1, please provide a description of the major components leading to the 67% increase.
  - a) Please reconcile the gross and net numbers provided in Table 3 and those in Appendix A.
  - b) Please specify why the continuation of the presentation in Appendix A does not assist the Board in understanding these cost changes in greater detail?
- 6) For line 10, please provide a breakout of all organizational memberships and their respective costs in 2019 through 2021.
  - a) Please provide the value to ratepayers associated with the memberships included
  - b) Please explain the fluctuations in those membership costs

**REF:** Exhibit B, Tab 3, Schedule 2, Page 13

Preamble: We would like to understand more about the respective compressor and the Compressor and Transmission and Underground Storage projects, their function and the allocation of costs between utility and non-utility.

- 7) For each of the projects listed, please provide a description of the project and an itemized description of the function provided and the rationale for the allocation of costs.

**REF:** Exhibit D, Tab 1, Page 1

8) Please provide the EGI annual financial report for 2021.

**REF:** Exhibit D, Tab 1, Schedule 6

Given the Board's decision on confidentiality dated July 29<sup>th</sup>, FRPO has submitted a letter directly to the Board copying EGI to allow EGI to answer confidentially.

**REF:** Exhibit E, Tab 1, Page 5, Table 3

Preamble: We would like to understand better how the allocation of cost for UDC for Union South was determined.

- 9) Please provide tables of planned versus actual delivered gas by path for each month of 2021 for the Union Rate. Please ensure that the paths include Dawn discretionary purchases for each month.
- a) Path
  - b) Planned Quantity
  - c) Actual Quantity

**REF:** Exhibit E, Tab 1, page 9 and Schedule 2 and  
EB-2020-0134 Exhibit I. FRPO.19, .20 &.21  
EB-2021-0149 Exhibit I.FRPO.20 & .21 and Decision on Settlement Proposal, Schedule 1, Settlement Proposal, page16

Preamble: In the first reference, EGI evidence states: *"The C1 Short-Term Firm Peak Storage revenues of \$1.536 million were \$6.347million lower than the 2013 Board-approved forecast of \$7.883 million. Actual Union rate zone utility storage requirements for 2021 were 8.3 PJ higher than the 2013 OEB-approved forecast, resulting in a decrease in the C1 Short-Term Firm Peak Storage available for sale (from 11.3 PJ in 2013 OEB-approved to 3.0 PJ in 2021). Union rate zone customers received the value of storage directly through the use of the storage space, rather than through the sale of short-term storage.*

The second references were interrogatories posed by FRPO in last year's deferral proceeding which yielded the values of storage space and deliverability but not the process of determination including the data requested.

In the third reference, the Board-approved settlement agreement stated: *In connection with the settlement of this issue, Enbridge Gas agrees that in future deferral and variance account clearance applications during the deferred rebasing term it will*

*include evidence about the determination of storage space and deliverability by rate class.*

We would like to understand better the determination of storage needs to in-franchise customers in the Union Gas rate zones and the ST Storage Deferral Account. We have been pursuing the company's approach to determination of the storage space and deliverability required including the data used. However, we have not received more than "Board-approved methodologies". We are asking again for a description of the determination and the data used for that determination. To be clear, stating that the numbers are for the Winter of 2021/22 or the 2021 Gas Supply plan is not helpful.

- 10) For the winters used to determine the needs used in this application, please provide a description of the process, the figures used and derivation of the amount of the following in tabular form with accompanying Excel spreadsheets for:
  - a) the determination of the storage space for each general service rate class
  - b) the determination of the amount of deliverability required by each general service rate class
- 11) Please provide EGI policy and practice regarding the determination of allocations of space and deliverability for general service in-franchise customers. To be more specific, we are asking for references to the policies and practices, approved by the Board for both Legacy Union Gas and Legacy Enbridge Gas.

**REF:** Exhibit E, Tab 1, Schedule 3, Page 1 and  
EB-2021-0149 Exhibit I.FRPO.24

Preamble: The first reference provides a table entitled SUMMARY OF NON-UTILITY STORAGE BALANCES - UNION RATE ZONES that depicts an entitlement of 127.6PJ with daily balances.

The second reference response included: *As posted on the Enbridge Gas website under operational information/storage reporting, the working capacity of Legacy Union Gas is 183.7 PJ of which 100 PJ is utility (as per NGEIR). The working capacity of Legacy Enbridge Gas is 122.9 PJ of which 99.4 PJ is utility (as per NGEIR).*

We would like to understand the evidence provided and the actual balances in relation to the encroachment directives of the Board.

- 12) Please confirm or correct the title of the slide that specifies "Union Rate Zones".
  - a) For the 127.6 PJ, please provide the sources of non-utility space between:
    - i) Legacy Union Gas
    - ii) Legacy Enbridge Gas
    - iii) Other sources

- 13) If the 127.6 PJ of space does not include space from Legacy Enbridge Gas, please provide a table for the last three years for EGD's non-utility storage space and daily values of actual balances for October and November.

**REF:** Exhibit E, Tab 1, Pages 1-5 and  
EB-2022-0072 GSP UPDATE, Appendix C and Transcript Day 2 GSP Stakeholder  
Conference, page 68, lines 1-21

Preamble: We would like to understand more about UDC and how EGI manages its transportation contracts through assignment to third parties and the allocation of costs to rate zones.

In the second reference, we were trying to understand the management of gas supply as it pertained to assignments. In the Stakeholder Conference, we previewed the type of information we were looking for and received assurances from EGI witnesses that the information could be provided and from EGI counsel that EGI would "provide this type of information in its pre-filed evidence". However, the prefiled evidence did not provide this data. This requested information allows the Board to understand EGI's approach to UDC, assignment and the allocation of costs and benefits.

- 14) For each month and for each transportation path and contract on the path that was assigned during 2021, please provide a table that provides the daily amount contracted, the daily amount of the contract assigned for each month of 2021, the total amount that was actually received at the delivery point in that month & the total transport cost, the additional revenue that was generated from the assignment, the account that received the revenue and the net impact on gas supply and transportation costs (using the table as provided in Attachment 1: DATA FOR TRANSPORT ASSIGNMENTS).
- a) Please provide resulting in an appropriately formatted multi-sheet Excel workbook.

**REF:** Exhibit E, Tab 1, Page 35-39 including Table 1

Preamble: EGI evidence states:

*A similar decrease and offsetting increase in UFG volumes has been observed between the 2020 and 2021 calendar years. The average UFG % for 2020 and 2021 is 0.440%, which is approximately 163.5 103m<sup>3</sup>/year average for the two years. The Company has identified that the true-up of estimated consumption based on the calendarization of UFG volumes has contributed to volatility between 2020 and 2021, but has not resulted in a material increase to the historical average of UFG over the course of two years. Typical estimation true-ups are outlined below.*

*At the end of each reporting period, Enbridge Gas records an estimate of gas*

*delivered but not yet billed. The true-up between the December 2020 estimate and the actual billed volumes resulted in a decrease to the delivery volumes recorded in January 2021. This true-up reflects that, when billings related to December 2020 were completed over the following month, it was determined there was an overestimate of gas deliveries for December 2020.*

We would like to understand better the impact of the year-end true-up as it pertains to the period of calendar 2021.

- 15) Please provide the before and after true-up volumes for December 2020 and January 2021.
- Please provide the determination of the before and after UFG volumes for 2020 and any impacts on 2021.
- 16) Did EGI perform a similar true-up for December 2021 using actuals for January 2022.
- If not, why not?
  - If so, please provide the before and after volumes for December 2021 and the resulting UFG.

As noted later in the performance metrics, EGI has had a very high level of meters that go without actual reads over several months. We would like to understand the potential for this to be a contributing factor.

- 17) If a customer goes without a bill for a number of months due to incorrect account numbers resulting in a billing gap that the company does not collect:
- Does the company write-off the gas cost to bad debt?
  - Given that there is no collection of funds, does the quantity of commodity still find its way to billed consumption or would it contribute to UFG?
- 18) As of December 31, 2021, for each Legacy utility, what percentage of customer had not had an actual meter read generated bill in at least two months.
- Please provide EGI's views on the potential for this lack of actual data on consumption at year-end can contribute to UFG.

Footnote 2 of Table 1 states: *UFG Volumes represent gas supply related to actual UFG volumes on behalf of ratepayers who do not provide UFG in kind as part of CSF*

- 19) Please provide EGI's reconciliation of CSF (customer supplied fuel) by showing the activity based UFG for those customers and the amount provided by those customers for 2021.

**REF:** Exhibit G, Tab 1, Page 2

Preamble: EGI evidence states: *The MRPM represents the number of meters with no read for four consecutive months or more divided by the total number of active meters to be read. The target for the metric is 0.5% and Enbridge Gas achieved a level of 5.0% in 2021. The result for 2019 was 0.7% and 4.4% in 2020. Enbridge Gas has faced challenges meeting the target since 2019 for several reasons, including the decision of a key meter reading vendor to no longer provide meter reading service resulting in the need to onboard a new vendor.*

- 20) For each of Legacy UG and EGD in 2021, please provide the percentage of meters with no read for:
- 4 months
  - 6 months
  - 9 months
  - 12 months
- 21) For each of Legacy UG and EGD in 2021, what percent of accounts received a zero consumption bill:
- From January to June
  - From July to November
- 22) For each of Legacy UG and EGD in 2021, what percent of accounts received an estimated consumption bill:
- From January to June
  - From July to November
- 23) What criteria is used to determine if a customer is billed an estimate or billed for zero consumption for a month for which the meter is not read.
- If the bill is estimated, does classification (actual vs. estimate) appear in the consumption data (e.g., the Invoice Rate Ready data) for direct purchase pools.
  - If not, what would be the cost to add this field to the data provided?
- 24) If a direct purchase customer whose year-end contract balance or two-point balancing limits were impacted by estimated or zero consumption readings, did EGI reverse any charges to the customer caused by the estimated or zero consumption billings.
- Please provide examples of communications that were sent to the affected customers.
  - If a direct purchase customer was affected by 3 or more zero or estimated reads, please describe how EGI approached any costs associated with balancing (i.e., annual renewal, two-point balancing, etc.).

- 25) What was EGI's approach to handling direct purchase customers whose accounts were closed in error with respect to returning that customer to their Direct Purchase Account?
- 26) If a group of general service rate customers are aggregated into a direct purchase group, what avenues do these customers have to seek adjustments to their accounts?
- Is there an Account Executive or similar type role?
- 27) What was the average wait time to get to a live account representative using the customer billing enquiry number 1-877-362-7434 and what is the abandonment rate:
- From January to June of 2021?
  - From July to November of 2021?
- 28) Please provide the respective amounts invested in the meter read, billing and customer accounting for EGI:
- Using 2020 actual costs
  - Using 2021 actual costs



**ATTACHMENT 1: DATA FOR TRANSPORT ASSIGNMENTS**

PATH: \_\_\_\_\_

CONTRACT: \_\_\_\_\_

Delivery/ Utilization Month	Amount Contracted (GJ/day)	Amount Assigned (GJ/day)	Transaction/ Contracting Agreement Date	Term of Contract (Dates)	Total Amount Delivered To EGI (GJ)	Total Transport Delivered Cost <sup>1</sup> (S)	Incremental Revenue (S)	Account (UFG/Optimization/ Other (Specify))	Gas Cost Impact (S/GJ)	Transport Cost Impact (S)
<b>Total for Month</b>										

**<sup>1</sup>Delivered Cost is zero if Assigned as a 100% Capacity Release for Load Balancing Management. Otherwise, what was paid in addition to the commodity cost at source to receive commodity at contract delivery point.**