



**BY EMAIL and RESS**

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Ontario Energy Board  
2300 Yonge Street  
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Toronto, Ontario  
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October 13, 2022  
Our File: EB20220184

**Attn: Nancy Marconi, Registrar**

Dear Ms. Marconi:

**Re: EB-2022-0184 – EPCOR Natural Gas LP South Bruce Phase 2 – SEC Interrogatories**

We are counsel to the School Energy Coalition (“SEC”). Attached, please find a copy of SEC’s interrogatories in the above-captioned matter.

Yours very truly,  
**Shepherd Rubenstein P.C.**

Mark Rubenstein

cc: Brian McKay, SEC (by email)  
Applicant and intervenors (by email)

**ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** an application by EPCOR Natural Gas Limited Partnership (“EPCOR”) pursuant to section 36(1) of the OEB Act for an order or orders approving or fixing just and reasonable rates and other charges for the sale and distribution of gas to be effective January 1, 2023 for the EPCOR Natural Gas Limited Partnership gas distribution system to serve the Municipality of Arran-Elderslie, the Municipality of Kincardine and the Township of Huron-Kinloss.

**INTERROGATORIES ON BEHALF  
OF THE  
SCHOOL ENERGY COALITION**

**SEC-1**

Please provide a copy of all material that EPCOR provides to potential new customers (residential and commercial) regarding expected natural gas rates and energy savings. Please specifically reference where EPCOR has told those customers they are expected to pay an additional amount in distribution rates, if overall gas usage is lower than EPCOR had previously forecast when initially having its rates set.

If the CVVA is approved, please explain what type of revised material EPCOR plans to provide potential new customers.

**SEC-2**

Please confirm that the CIP volume forecast, including the breakdown by customer type, that EPCOR will use as the baseline for determining any amount to be included in the CVVA, is set out in Table 3-8 in its 2019-2028 rate application (EB-2018-0264, Exhibit 3, Tab 1, Schedule 1, p.2)

**SEC-3**

For each of 2020 and 2021, please provide the full calculation of the balance that would be included in the CVVA. The calculation should include, among other aspects, exactly how the weather normalization was undertaken, and the breakdown of the customer type for both attachments and volumes (included in EB-2018-0264 and actuals).

**SEC-4**

[Application p.33-34] Please provide a revised version of Tables 1.5 and 1.9, that excludes revenue (Table 1.5) and volume (Table 1.8) differences associated with variance in forecast and actual customer connections.

**SEC-5**

With respect to the timing of customer connections with a year:

- a. Please confirm that EPCOR assumed that any new customer connections would occur at the mid-point of the year as it applied a half-year rule approach to new connection volumes.
- b. For the purposes of calculating any balance in the CVVA, does EPCOR propose adjusting the consumption for a customer in the year they connect to the system, to reflect the timing in the year of their connection compared to what was forecast?

**SEC-6**

For each customer type, and for each year between 2023 and 2028, please provide the distribution and total bill impact, if the CVVA is approved (assuming annual deposition of the account as proposed).

**SEC-7**

[OEB Staff.3k] With respect to the impact on the expansion to the Brockton area:

- a. Please confirm that the Brockton area was not part of the CIP process, and its costs were not included in EPCOR's approved revenue requirement.
- b. Does EPCOR plan to bring a separate rate application for its expansion into Brockton? If so, please provide details.

Respectfully, submitted on behalf of the School Energy Coalition, this October 13, 2022.

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Mark Rubenstein  
Counsel for the School Energy