

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

October 3, 2023

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-2023-0092 Enbridge Gas Inc.: Application with respect to certain 2022
Deferral Accounts and for approval of its 2022 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.

**2022 Deferral and Variance Account and Utility Earnings Application
EB-2023-0092**

OGVG INTERROGATORIES

October 3, 2023

OGVG-1

Ref: Exhibit B Tab 3 Schedule 1 Page 3

Preamble: CSS costs were \$67.1 million higher than the prior year primarily due to: a higher share price and stronger Enbridge Inc. performance that has resulted in higher LTIP and STIP, higher legislative benefit costs resulting from a year over year change in maximum contribution levels, higher TIS costs related to additional mandated cybersecurity costs and incremental sustainment costs related to the addition of 1.6 million customers to the CIS system in 2021. These variances were partially offset by higher overhead capitalization of CSS costs, lower pension costs and a decrease in insurance premium costs.

- a) What were the total LTIP and STIP amounts within the CSS cost category in 2021 and 2022?
- b) What would the total LTIP and STIP amounts within the CSS cost category have been in 2022 at the following levels:
 - i) Assuming that performance in 2022 had attracted the minimum amount of LTIP and STIP,
 - ii) Assuming that performance in 2022 had attracted the “target” amount of LTIP and STIP, and
 - iii) Assuming that performance in 2022 had attracted the maximum amount of LTIP and STIP.
- c) What were the total LTIP and STIP amounts incurred outside the CSS cost category in 2021 and 2022?
- d) What would the total LTIP and STIP amounts outside the CSS cost category have been in 2022 at the following levels:
 - i) Assuming that performance in 2022 had attracted the minimum amount of LTIP and STIP,
 - ii) Assuming that performance in 2022 had attracted the “target” amount of LTIP and STIP, and
 - iii) Assuming that performance in 2022 had attracted the maximum amount of LTIP and STIP.