



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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August 16, 2024
Our File: EB20240125

Attn: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: EB-2024-0125 – Enbridge Gas Inc. 2023 ESM/DVA – SEC Interrogatories

We are counsel to the School Energy Coalition ("SEC"). Attached, please find SEC's interrogatories.

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 (Schedule B);

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
ON BEHALF OF THE
SCHOOL ENERGY COALITION**

SEC-1

[B-2-2] Please provide a breakdown and explanation of the main drivers of Enbridge earnings being below the 2023 deemed ROE.

SEC-2

[C-1, p.2] With respect to the Accounting Policy Changes Deferral Account, Enbridge states that it “is seeking final disposition of the remaining balance in the APCDA, reflecting the variance between the forecast balance approved in the EB-2022-0200 Phase 1 Decision and Order, and associated Interim Rate Order dated April 11, 2024, and the final actual balances calculated through December 31, 2023.” Please detail where in the EB-2022-2000 record did Enbridge propose, and the OEB agree, that forecast balances disposed in the EB-2022-0200 Phase 1 would be subsequently true-up.

SEC-3

[C-1, p.23] With respect to the Getting Ontario Connected Act (“GOCA”) Variance Account:

- a. For each year since 2017, please provide Enbridge’s actual locate costs.
- b. For each year since 2017, please provide Enbridge’s actual locate volume.
- c. For each year since 2017, please provide Enbridge’s actual VMS costs.
- d. For each year since 2017, please provide Enbridge’s actual VMS volume.
- e. Please confirm that it is Enbridge’s position that the entire increase in locate and VMS costs since 2021 is as a result of Bill 93. If not confirmed, please show where those costs not caused by Bill 93 are excluded from the GOCA VA.
- f. [EB-2023-0143 Decision and Order, Schedule B] Referencing the Gas Utility GOCA VA Accounting Order, please explain how VMS costs are eligible for inclusion.

SEC-4

[D-1, p.58] Please provide a copy of all internal business cases (or similar documents) regarding Enbridge’s Fugitive Emissions Measurement Plan and the proposed pilot project.

SEC-5

[D-1, p.61] Enbridge states that its “2022 leak volumes were 18,118 10³m³, (including leak volumes related to both DO and STO), representing 4% of the Company’s 2022 UAF/UFG volumes (EGD and Union Rate Zones combined).”

- a. Please provide the cost of what the 2022 leak volumes represent.

- b. Please provide the 2023 leak volumes and the cost it represents.

SEC-6

[D-1, p.64] Table 12 shows forecast 2025 spending that would be recorded in the proposed Fugitive Emissions Measurement Plan DA (FEMADA) for administration and pilot costs:

- a. Are any of the cost elements capital costs, and if so, is the 2025 forecast costs a revenue requirement number?
- b. If the answer to part (a) is yes, please provide a revised version of the table showing capital costs separately, and a breakdown of the revenue requirement calculation.
- c. Are the administration costs directly related to undertaking the pilot? If not, please detail which costs would be incurred if there was no pilot project.
- d. Please confirm that Enbridge is seeking approval of the FEMADA, and that the account is not restricted to spending related to the pilot project.

Respectfully, submitted on behalf of the School Energy Coalition this August 16th, 2024.

Mark Rubenstein
Counsel for the School Energy Coalition