EB-2025-0064
Enbridge Gas Rebasing – Phase III

Interrogatories of Environmental Defence

Interrogatory # 1.13-ED-1

Reference: Exhibit 1, Tab 13, Schedule 5 (Interruptible Rates)

Preamble: Enbridge states as follows at page 10:

> When applicable, Enbridge Gas implements a Non-Binding Expression of Interest (EOI) / Reverse Open Season (ROS) process to gather potential additional customer demands and identify opportunities to reduce existing contract customer demands, which ensures that the best available customer demand information informs project requirements and potential IRP opportunities. An EOI/ROS is triggered on a case-by-case basis for increased demand-driven Leave to Construct projects, and for defined geographic areas of benefit where Enbridge Gas contract rate customers have identified a need for increased or decreased capacity via their regular ongoing discussions with their Enbridge Gas account managers.

Question(s):

(a) Please provide a detailed bullet point list of the steps taken when a Non-Binding Expression of Interest (EOI) / Reverse Open Season (ROS) process is used to gather interest in interruptible rates.
(b) Please list the five most recent instances in which this was done as part of an IRP assessment. For each, please indicate (i) the number of customers in the relevant area potentially eligible for an interruptible rate, (ii) the number of customers that Enbridge reached out to with an automated or non-specific message, (iii) the number of customers that expressly responded to Enbridge; and (iv) the number of customers that Enbridge directly communicated with on an individualized basis (e.g. a phone call or email specific to that customer's situation).
(c) When is a Non-Binding Expression of Interest (EOI) / Reverse Open Season (ROS) process used outside of a IRP process.
(d) For the examples listed in (b) please provide a copy of the communications sent to customers.
(e) Aside from the IRP process, in what other instances does Enbridge use a Non-Binding Expression of Interest (EOI) / Reverse Open Season (ROS)?
(f) Please summarize the outcome of customer engagement on interruptible rates in bullet points (from Tab 6).
(g) Please describe how Enbridge took this engagement into account.

Interrogatory # 1.13-ED-2

Reference: Exhibit 1, Tab 13, Schedule 5 (Interruptible Rates)

Question(s):

(a) Please provide the full terms and conditions of the interruptible service offered by Enbridge.
(b) Does Enbridge offer customers the option of a partially interruptible service (i.e. a curtailable service) whereby a customer must reduce demand below a certain level when asked to do so (instead of fully ending service)? If not, why not.
(c) How is interruptible service implemented when there is a call for demand response? For example: Is the customer responsible for curtailing or ceasing its own demand? Can Enbridge unilaterally restrict or end flow to a customer? How is the call for demand response communicated (e.g. by phone, automated message, direct control of devices, etc.)? How does Enbridge monitor compliance?
(d) How are the costs for implementing interruptible service (e.g. doing the things noted in (c)) recovered? Are they recovered from all customers or just interruptible customers?

Interrogatory # 1.13-ED-3

Reference: Exhibit 1, Tab 13, Schedule 5, p. 21 (DCF+ Test)

Question(s):

(a) Please file a copy of the DCF+ Supplemental Guide (the Guide) referred to in paragraph 49, the latest version, and a tracked changes copy showing the changes between them.
(b) Does Enbridge have a copy of the DCF+ test that can be used to economically evaluate projects? If not, please indicate when it will be complete.
(c) Paragraph 52 refers to an "economic evaluation of the investments which have passed technical evaluation." Please provide a copy of the three most recent economic evaluations that have occurred to help provide a sense of how those are being conducted.

Interrogatory # 1.13-ED-4

Reference: Exhibit 1, Tab 13, Schedule 5, p. 26 (Pilots)

Question(s):

(a) Please provide a table showing each of the directions from the decision in EB-2022-0335, the steps Enbridge has taken on the direction thus far, the next steps planed, and the estimated completion date for (i) the next steps and (ii) the completion of the direction.
(b) To the extent not addressed in the response to (a), please provide a timeline of all the next steps for IRP pilots.

Interrogatory # 1.13-ED-5

Reference: Exhibit 1, Tab 13, Schedule 5, p. 31 (System pruning)

Preamble:

Question(s):

(a) Please provide the instructions/questions to DNV relating to the jurisdictional scan. Please also provide any work product completed thus far
(b) Please provide a timeline of next steps for system pruning, including the dates for commencement of the pilots.
(c) Please provide a summary of the draft system pruning pilot details. We understand that the pilot is not ready yet, and therefore are asking for the current thinking, knowing it is draft. A response can be generated for this interrogatory or Enbridge can attach existing summary materials.
(d) Who is on the system pruning subcommittee and how often have they met?
(e) Where is there no tab 14 or 15 in Exhibit 1?

Interrogatory # 1.16-ED-6

Reference: Exhibit 1, Tab 13, Schedule 5, p. 31 (Marketing)

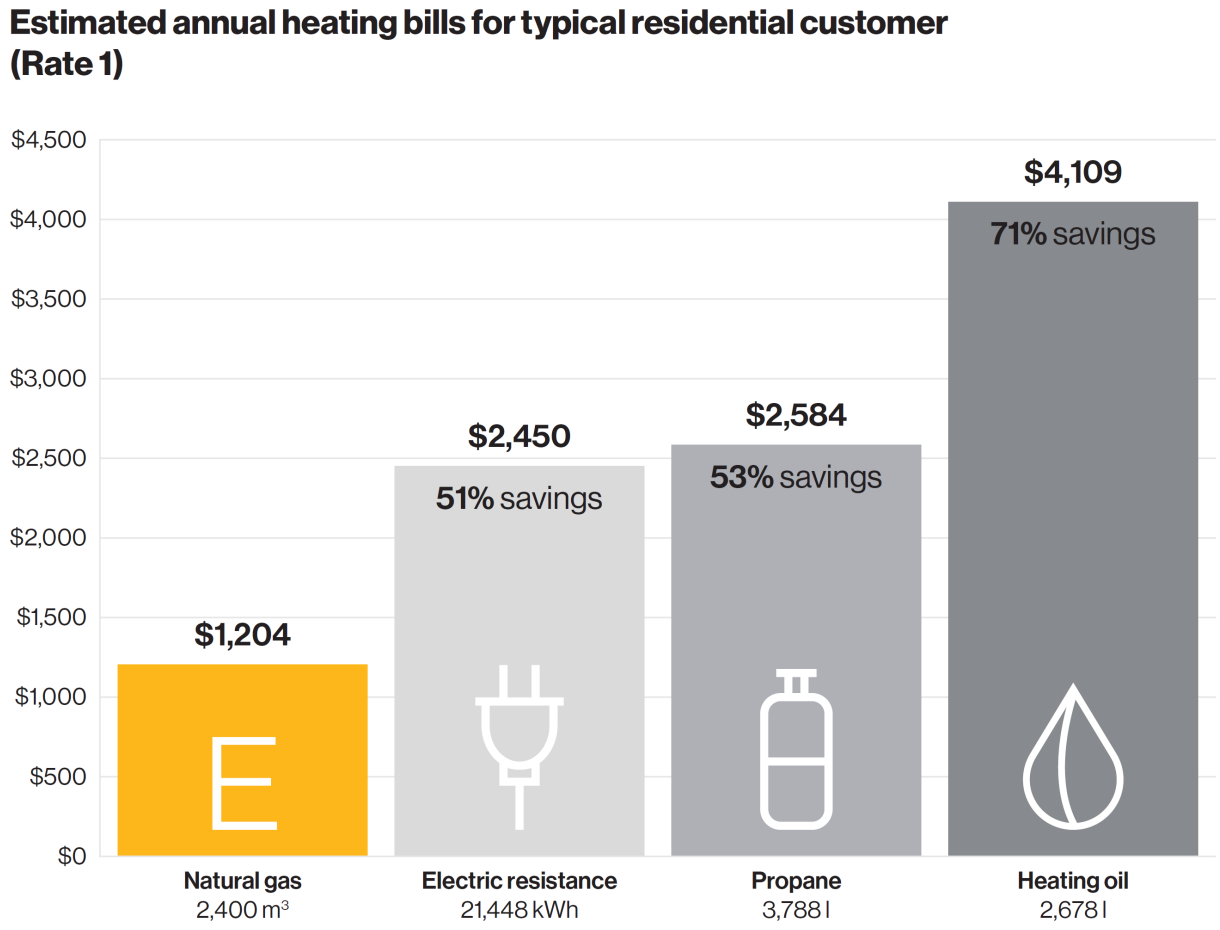
Question(s):

(a) Have there been any updates to the marketing materials since the pre-filed evidence was prepared and filed in February of this year? If yes, please describe the updates and file the updated materials.
(b) Does Enbridge anticipate including relative cost-effectiveness comparisons of natural gas heating in future materials? If that is likely to occur, please indicate when it is likely to occur.
(c) How much would an average residential customer pay to Enbridge for the System Expansion Surcharge based on the average annual use for all Enbridge residential customers?
(d) How much would an average residential customer pay to Enbridge for the System Expansion Surcharge based on the average annual use for Enbridge customers in community expansion areas?
(e) Would Enbridge agree to include the figures in (c) and (d) in its marketing materials for community expansion projects?

Interrogatory # 1.16-ED-7

Reference: Exhibit 1, Tab 13, Schedule 5, p. 31 (Marketing)

Preamble:



Question(s):

(a) Please provide an updated version of the heating cost comparison (shown above) with an additional bar for a cold climate heat pump. Please also provide all calculations and assumptions.

Interrogatory # 2-ED-8

Reference: Exhibit 2, Tab 5, Schedule 5 (Capital reductions – cathodic protection)

Question(s):

(a) Please provide Enbridge's planned spending on cathodic protection before the phase 2 decision and now. Please explain any changes. Please also include actual spending back to 2020 and include the planed spending for as many years as are readily available.
(b) Does Enbridge agree that good proactive maintenance and upkeep, such as cathodic protection, can reduce future capital spending in the future, other things equal? Please list

the proactive maintenance/upkeep activities that Enbridge performs in order to reduce the need for replacement.

(c) For each item listed in (b), please provide the past five years of spending and the forecast next five years of spending.

(d) Please provide a list showing the percentage of Enbridge pipelines with: (i) known acceptable cathodic protection, (ii) known inadequate cathodic protection, and (iii) cathodic protection sufficiency unclear. Please also provide a narrative description of the overall stage of cathodic protection across the system.

Interrogatory # 2-ED-9

Reference: Exhibit 2, Tab 5, Schedule 5 (Capital reductions)

Question(s):

(a) Enbridge spent less on connections than forecast. Please provide a breakdown of the decline in spending between the causes of the decline, including the proportion that are caused by fewer customer requests versus factors that Enbridge controls.

(b)

Interrogatory # 7-ED-10

Reference: Exhibit 7

Question(s):

(a) Please provide a table listing each cost allocation and rate design proposal and indicate how, if at all, the proposal would impact (i) DSM cost-effectiveness (ii) the incentive of customers to implement building envelope improvements, and (iii) the incentive of customers to implement fuel switching.

(b) Please map out how the rate class harmonization will impact the number of customers included in the various DSM programs (e.g. shifts between C&I and large industrial).

Interrogatory # 8-ED-11

Reference: Exhibit 8 (exit fees)

Question(s):

(a) Enbridge indicates that it will consider whether to propose exit fees. Would Enbridge agree as part of this proceeding to refrain from proposing to apply exit fees to existing customers (i.e. limit the application of exit fees only to newly connected customers that have notice of such fees)?

(b) If Enbridge is not willing to refrain from proposing exit fees that would apply to existing customer, would it agree to change its connection process today to secure an acknowledgement from the connecting customers that they may be charged an exit fee should they decide to leave the system at a future date?

Interrogatory # 8-ED-12

Reference: Exhibit 8 (SFVD)

Preamble: Ex. 8-2-3, p. 16 states: "Where customer energy choices like hybrid heating change the consumption profile for groups of customers, Enbridge Gas is confident SFVD will be able to accommodate this outcome"

Question(s):

(a) Please estimate the annual bill impact of implementing SFVD for a typical customer with hybrid heating. Please make and state assumptions as necessary and provide all underlying calculations. Please also provide a breakdown of the billings by its component parts. We understand that the bill impacts will depend on a variety of factors, but a sense of the impact based on Enbridge assumption remains helpful. Enbridge is free to describe a number of scenarios in responding to this question if it wishes.
(b) Please estimate the annual bill impact of implementing SFVD for a typical customer with no gas heating. Please make and state assumptions as necessary and provide all underlying calculations. Please also provide a breakdown of the billings by its component parts. We understand that the bill impacts will depend on a variety of factors, but a sense of the impact based on Enbridge assumption remains helpful. Enbridge is free to describe a number of scenarios in responding to this question if it wishes.

Interrogatory # 8-ED-13

Reference: Exhibit 8 (SFVD)

Preamble: The SFVD proposal involves imputed values for peak demand. These questions explore how the proposal will calculate demand charges for customers whose demand profile changes due to participation in DSM.

Question(s):

(a) Please provide an example of the billings for a customer that installs removes their furnace (e.g. due to a cold climate heat pump installation). Please have the example explore how well Enbridge's proposals would accurately track the customer's peak demand. Please provide the customer's actual monthly peak demand, computed peak demand, and the peak demand charges that would arise from each over a 24-month period, with the installation of the cold climate heat pump occurring in the middle of that period. Please make and state assumptions as necessary.

(b) Please undertake the same analysis in (a) but for a customer that is installing hybrid heating.
(c) Please undertake the same analysis in (a) but for a customer that is implementing building envelope improvements that would reduce peak heating load by 25%.
(d) Does Enbridge anticipate that its methodology for calculating peak demand is likely to over or underestimate the peak demand of customers:
    (i) With a home that are more efficient than average;
    (ii) With a hybrid heat pump; or
    (iii) Without a gas furnace?
    Please explain.
(e) What steps will Enbridge take to ensure that DSM measures are accurately reflected in the peak load calculations.

Interrogatory # 8-ED-14

Reference: Exhibit 8 (SFVD)

Question(s):

(a) Please describe whether and how SFVD will impact the cost-effectiveness and of the following DSM measures: hybrid heating, cold climate heat pumps, building envelope improvements. Please quantify the response where possible.
(b) Please describe whether and how SFVD will impact the customer incentives to implement the following DSM measures: hybrid heating, cold climate heat pumps, building envelope improvements. Please quantify the response where possible.

Interrogatory # 8-ED-15

Reference: Exhibit 8 (SFVD)

Question(s):

(a) Please explain how SFVD will remove average use and weather risks seeing as a portion of the charges will still be recovered via a volumetric charge.

Interrogatory # 8-ED-16

Reference: Exhibit 8-2-3 9 (VOLUVAR)

Question(s):

(a) Please discuss the principles that Enbridge generally should only be responsible for risks that it can at least partially manage (i.e. as a means to ensure that the risks are appropriately managed).

(b) Please estimate approximately how much customers pay Enbridge in additional return to Enbridge to bear weather related risks. We understand that a firm answer is impossible, and ask only for a best efforts estimate with caveats.
(c) Enbridge states on page 3: "Currently, the customer bears the risk when the weather is colder than forecast, and the Company bears the risk when the weather is warmer than forecast." Please provide a table for the past 10 years showing the upside or downside revenue implication of weather being warmer or colder than expected. Please also provide the final result showing whether over the period customers or the Company benefited from the variance, and a total calculation of that benefit.
(d) Please provide the same table as in (c) but for customer connection variances from forecast.
(e) How will VOLUVAR and SFVD impact the revenue risk related to customer connection numbers? Please explain

Interrogatory # 8-ED-17

Reference: Exhibit 8-2-1 Attachment 1 & 5 (SFVD)

Question(s):

(a) Does Christensen Associates anticipate that the proposed methodology for calculating peak demand is likely to over or underestimate the peak demand of customers:
    (i) With a home that are more efficient than average;
    (ii) With a hybrid heat pump; or
    (iii) Without a gas furnace?
    Please explain
(b) What steps would Christensen recommend to ensure that DSM measures are accurately reflected in the peak load calculations?
(c) What steps would Christensen recommend to ensure that customers with efficient homes and equipment are not overcharged?

Interrogatory # 8-ED-18

Reference: Exhibit 8-4-7 (Interruptible service)

Question(s):

(a) What is the shortest, longest, and average duration for a call from Enbridge to interrupt service over the past 5 years (an estimate is sufficient)?