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December 2, 2008

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ms. Walli:

Re: EB-2008-0106 – BOMA Interrogatories for Enbridge Gas Distribution

Please find attached the interrogatories of the Building Owners and Managers Association of the Greater Toronto Area in the above noted proceeding.

Sincerely,

Randy Aiken
Aiken & Associates

cc: Norm Ryckman, Enbridge Gas Distribution

IN THE MATTER OF a proceeding initiated by the Ontario Energy Board to determine methodologies for commodity pricing, load balancing and cost allocation for natural gas distributors.

INTERROGATORIES OF THE BUILDING OWNERS AND MANAGERS ASSOCIATION OF THE GREATER TORONTO AREA FOR ENBRIDGE GAS DISTRIBUTION

Interrogatory # 1

Ref: Exhibit E1, page 2

If Enbridge were to purchase some of its system gas supply at a fixed price for any of the months included in the next 12 months, would this price and the associated volume be taken into account when setting the gas supply reference price? Please explain.

Interrogatory # 2

Ref: Exhibit E1, page 19 – 20

How will Enbridge determine the volume for the next 12 months that is used to calculate the rate riders associated with the debits/credits that are to be recovered prospectively? Are these volumes based on the most recent Enbridge forecast or fixed at the levels included in the last Board approved IRM filing? Are there separate rate riders and 12 month volume forecasts by rate class?

Interrogatory # 3

Ref: Exhibit E1, page 20

In calculating the effect of a change in the reference price on the revenue requirement, Union Gas includes the changes related to compressor fuel and unaccounted for gas in the Intra-period WACOG deferral account (Exhibit E2, page 12). Does Enbridge include the change in costs related to compressor fuel and/or unaccounted for gas in its calculation of the impact on the revenue requirement?

Interrogatory # 4

Ref: Exhibit E1, page 43

Union appears to include commodity related bad debt expense and the carrying cost on the gas purchase working capital as part of their system administration fee, while Enbridge appears to account for these costs outside of the system gas fee (paragraph 142).

a) Is there any implication in terms of the allocation methodology or any other difference in determining the amount of bad debt expense and/or the carrying cost on the gas purchase working capital outside of the system gas fee which is done on an incremental basis?

b) Why are any costs related to demand forecasting included in the system gas fee? What incremental function related to system gas are these costs related to?

c) How does Enbridge determine the portion of the bad debt expense to allocate to the system gas fee?

d) Does Enbridge allocate any of the investment carrying costs associated with customer deposits to the system gas fee? If not, why not?

e) What is the level of Enbridge's current system gas fee?

f) Does the system gas fee change during an incentive regulation period, or does it only change at a cost of service rebasing application?

g) Does Enbridge adjust the cost related to the commodity-related working cash that would result from a change in the cost of gas? If not, why not?

h) Please confirm that the system gas fee and DPAC fees do not include any allowance for costs or assets used by the employees directly involved in providing these services, such as computer hardware, software, office equipment and furniture.

i) Does the system gas fee include any regulatory costs associated with the preparation, filing and implementation of QRAM filings? If not, please explain why not.