

IGUA INTERROGATORY #2

INTERROGATORY

Reference: Ex. C, Tab 1, Sch. 11, p. 2 of 2.

Preamble: EGD has listed the cost elements and actual amounts that comprise the balance in its 2016 Greenhouse Gas Emissions Impact Deferral Account, but provided no explanation for each cost element.

Questions:

- (a) Is the explanation for each cost element exactly as presented in EGD's compliance plan application for the cap and trade program, and the associated response to interrogatories?
- (b) If not, what is EGD's explanation for the costs incurred in each "cost element" category?
- (c) Is the balance in this account attributable to activities that support both EGD's customer-related and facility-related greenhouse gas obligations?
- (d) If so, is EGD able to allocate the balance in this account to customer-related and facility-related obligations?
- (e) If so, please provide this allocation.
- (f) If not, please provide the total amount of EGD's customer-related and facility-related greenhouse gas obligations as set out in its 2017 compliance plan.

RESPONSE

With respect to 2016 GGEIDA, the Board determined the following in Procedural Order No. 2:

The OEB finds it appropriate to defer consideration of the final disposition of Enbridge's 2016 GGEIDA account balance. However, the OEB will consider whether the balance should be disposed of on an interim basis in this proceeding. As a result, interim disposition of the 2016 GGEIDA Account is added as an issue for the settlement conference and intervenor cost award eligibility. The OEB finds it appropriate to defer final disposition given the other, concurrent applications before the OEB.

Witness: F. Oliver-Glasford

and

Any matters related to the GGEIDA account (other than whether interim disposition of the GGEIDA account is appropriate) are excluded from settlement.

In its Application, Enbridge requested disposition of 2016 GGEIDA balance with supporting evidence. If Enbridge's proposal is approved by the Board on an interim basis, the 2016 debit balance of \$0.853 million would be collected from ratepayers on an interim basis.

Given the Board's determination in Procedural Order No. 2, the Company does not consider it appropriate to provide responses to the interrogatory questions above within this proceeding.

Witness: F. Oliver-Glasford