

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Answer to Interrogatory from
Unifor

MAADs Issues List – Issue No. 1

Reference: Section 4.6: Estimated Cost Efficiency Opportunities (Exhibit B, Tab 1,
p. 25 of 44)

Question:

- a) What workforce restructuring and alignment are the applicants contemplating in the area of Customer Care?
- b) What workforce restructuring and alignment are the applicants contemplating in the area of Distribution Work Management?
- c) What workforce restructuring and alignment are the applicants contemplating in the area of Utility Shared Services?
- d) What workforce restructuring and alignment are the applicants contemplating in the area of Storage and Transmission, Gas Supply and Gas Control?
- e) What workforce restructuring and alignment are the applicants contemplating in the area of Management Functions?
- f) What workforce restructuring and alignment are the applicants contemplating in the area of Other Functions?
- g) What system and process integration are the applicants contemplating in the area of Customer Care?
- h) What system and process integration are the applicants contemplating in the area of Distribution Work Management?
- i) What system and process integration are the applicants contemplating in the area of Utility Shared Services?
- j) What system and process integration are the applicants contemplating in the area of Storage and Transmission, Gas Supply and Gas Control?
- k) What system and process integration are the applicants contemplating in the area of Management Functions?
- l) What system and process integration are the applicants contemplating in the area of Other Functions?

Response:

Please see response to BOMA Interrogatory #16 found at Exhibit C.BOMA. 16.

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MAADs Issues List – Issue No. 1

Reference: Table 4 (Exhibit B, Tab 1, p. 26 of 44)

Question:

- a) How did the applicants arrive at potential O&M savings of between \$350 million and \$750 million?
- b) How did the applicants arrive at potential capital investment costs of between \$50 million to \$250 million?

Response:

Please see response to BOMA Interrogatory #16 found at Exhibit C.BOMA.16.

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MAADs Issues List – Issue No. 1

Reference: Distribution Work Management (Exhibit B, Tab 1, p. 31 and 32 of 44)

Question:

- a) How did the applicants arrive at a related savings estimated at \$11 million per year?
- b) How do the applicants' estimated savings increase to \$16 million per year in 2024-2028? The explanation given, namely 'optimizing third party contracts and consolidating the workload planning and dispatching functions' is unclear in its meaning and potential implications.

Response:

Please see response BOMA Interrogatory #16 found at Exhibit C.BOMA.16.