

APPrO INTERROGATORY #8

INTERROGATORY

**Issue 3**

Reference: i) Exhibit B Tab 1 Schedule 1,

Preamble: APPrO would like to understand the long term effects of the proposals.

Questions:

- (a) At paragraph 24 Enbridge notes that: *“The Company has used the Board’s EBO 188 Guidelines as a guide in the determination of the charges for these services. This approach aims to ensure that existing ratepayers will not subsidize these new programs”*.
  - i. Does this rate structure create any risks of intergenerational rate inequity? Please explain fully.
  - ii. Please explain why Enbridge would not propose a standalone rate structure whereby the rates are developed without any deferral or variance accounts and all costs and risks are fully borne either by the users of the particular program or Enbridge?
- (b) Did Enbridge consider any economic test other than the test included on EBO 188. If so please indicate what they were and why there were rejected.

RESPONSE

- (a)
  - i. Please see the Company’s response to APPrO Interrogatory #2, parts c) and d) filed at Exhibit I.1.EGDI.APPrO.2.
  - ii. Please see the Company’s responses to SEC Interrogatory #3 filed at Exhibit I.1.EGDI.SEC.3 and the Company’s response to FRPO Interrogatory #4, part a) filed at Exhibit I.2.EGDI.FRPO.4.
- (b) No, Enbridge did not consider any economic test other than the test included on EBO 188. Enbridge believes that EBO 188 is the appropriate approach.