

ENERGY PROBE INTERROGATORY #1

INTERROGATORY

Reference: Exhibit A, Tab 1, Schedule 3 Page 5

Preamble: "Second, it excludes an important required feature outlined in the scope of work of the NTG Study, namely Enbridge/Union Gas program based determinations of spillover. While it does include a proxy deemed spillover value sourced from another study conducted in Massachusetts (applied as a result of an instruction given by Board Staff – to be discussed further below), Enbridge views the report as incomplete."

Can Enbridge provide its current spillover estimates and when the last time that figure was updated.

RESPONSE

Enbridge does not have a current spillover estimate and has not applied a spillover value in its determination of CCM, DSMI or LRAM outlined in this application. Enbridge has similarly not applied a spillover value in determination of results in prior years. Based on the NTG Study scope of work, Enbridge understood that the spillover value would be contained in the recent NTG Study. Instead the NTG Study only included an adjustment for free-ridership.

Witnesses: D. Bullock
D. Johnson