## **Enbridge Targeted PBR Plan** 2000 - 2002

R. J. Campbell

**Regulatory Affairs** 

**Enbridge Gas Distribution Inc.** 

OEB IRM Working Group October 26, 2007





### Natural Gas Forum Report March 2005

- "the reluctance of many stakeholders to endorse PBR is related to their dissatisfaction with the trial PBR plans"
- "the PBR plans were widely considered unsuccessful"
- "PBR plans did not meet the expectations of the Board or the stakeholders, including the utilities"
- "customer groups were disappointed by what they saw as the absence of any explicit or tangible benefits resulting from the trial PBR plans"



## Regulatory Environment in 1999

- long process of the unbundling integrated natural gas utilities finally being implemented
- utilities and OEB anxious to adopt PBR mechanisms
- statutory hurdles to rate regulation by means other than cost of service being addressed by amendments to the OEB Act



# **Enbridge Consumers Gas Targeted PBR**

- O&M targeted plan approved by OEB April 1999
- 3 year revenue cap, 2000-2002 inclusive
- O&M escalation a function of growth plus inflation less productivity offset
- stakeholders reluctant to give up COS:
  - if PBR, they wanted a comprehensive plan
- OEB regards the targeted plan as transitional



#### **O&M Escalation Formula**

$$O \& M_{t} = O \& M_{t-1}(1+G-x)(1+I) \pm Z$$

I = Inflation = Ontario CPI

**G** = **Growth** = # of customer bills

X = Productivity = 0.63% + stretch factor of 0.50%



## Targeted PBR Plan Other Features

#### Z-Factors:

- tax changes
- regulatory orders
- accounting rule changes

#### Service Quality Indicators

- telephone service factor
- meter reading
- emergency response time
- distribution system integrity
- gas utilization infractions

#### DSM shared savings mechanism



## **O&M Cap Escalators**

Year	CPI	Growth	X Factor	<b>Escalator</b>	
2000	2.6%	3.45%	1.1%	5.01%	
2001	3.5%	3.70%	1.1%	6.19%	
2002	2.2%	3.03%	1.1%	4.14%	



### **Integrated Distribution Utility** 1998

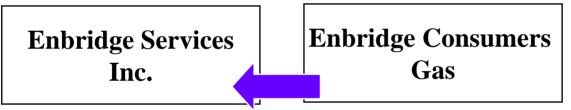
**Enbridge Consumers Gas** 

3750 employees

- •distribution system
- storage
- commodity sales
- •appliance sales & rentals
- •customer care



## **Unbundling: Retail Affiliate Established 1999**

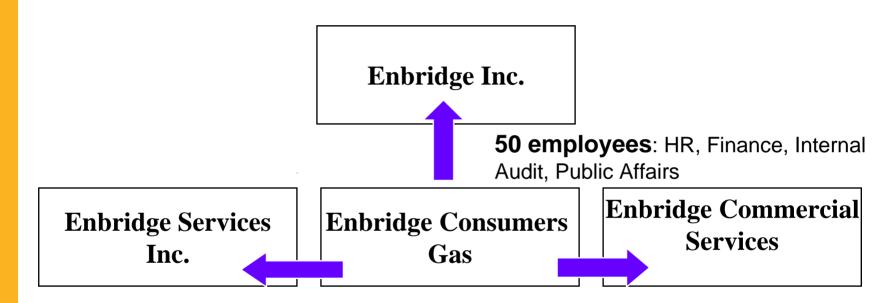


#### 570 employees

- •customer care
- commodity sales
- •appliance rental & sales
- •repair service
- home renovation, insurance& financing



## Commercial Services Affiliate Established, 2000



- commodity sales
- •appliance rental & sales
- •repair service
- home renovation, insurance& financing
- regulated monopoly
- pipeco, although still providing system gas

- 1100 employees
- •call centre
- customer billing
- collections
- •fleet management
- •information technology

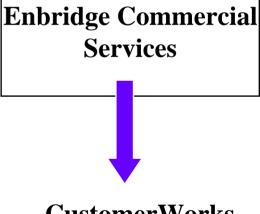


## **Establishment of CustomerWorks** and Sale of ESI, 2002

**Enbridge Inc.** 

**Enbridge Services** Inc. Centrica LLP

**Enbridge Consumers** Gas



CustomerWorks.

- •call centre
- •billing & collections



## Rebasing Issues

- O&M budget increase where's the PBR benefit?
- provision of "core utility services" by others
- arrangements & cost of services provided by affiliates
  - corporate fees--centres of excellence
- these issues influenced EGD rate cases for years
  - corporate cost allocation methodologies still an open issue before the Board



### **Some Results**

Year	RR per <u>Customer</u>	O&M per <u>Customer</u>	Allowed ROE %	Actual ROE %
2003	\$511	\$169		
2002	<b>\$501</b>	<b>\$148</b>	9.66	8.98
2001	<b>\$521</b>	<b>\$157</b>	9.54	10.8
2000	<b>\$524</b>	<b>\$152</b>	9.73	8.23
1999	<b>\$529</b>	\$156	9.51	7.94



#### **NGF Conclusions on IR**

- annual system of COSR is inefficient
- Board intends to adopt the best aspects of both COSR and PBR
- the Board will establish a firm framework for Incentive Regulation
- there will be a "robust" rebasing between IR plans
- utilities should not alternate between COSR and Incentive Regulation



#### **IR Conclusions**

- IR terms of 3-5 years
- yes to comprehensive plans
- yes to SQIs as a base; no incentives
- yes to inflation & productivity adjustments
- no to earning sharing mechanism
- devil in the details; need to determine
  - deferral & variance accounts
  - Y factors
  - Z factors
  - inflation factor
  - total factor productivity & X factor
  - rebasing rules