

**DEMANDE DE RENSEIGNEMENTS N° 1 DE LA RÉGIE DE L'ÉNERGIE (LA RÉGIE) RELATIVE AU
DOSSIER GÉNÉRIQUE PORTANT SUR L'ALLOCATION DES COÛTS ET
LA STRUCTURE TARIFAIRE DE GAZ MÉTRO**

1. **Référence :** (i) C-ACIG-0028, p. 7 et 8.

Préambule :

« The zero-intercept method is one of the generally accepted methods for mains classification and is used by various utilities and regulators. However, from a strict theoretical standpoint, the zero-intercept method is at best a rough approximation to cost causation. The zero-intercept method relies on the assumption that the customer-related portion of mains cost is equivalent to the cost of a replacing the existing distribution system with a theoretical system based on pipe with zero load-carrying capability.

However, this approach is not theoretically perfect. As I demonstrate algebraically in Exhibit IEC-3, the customer component as defined in zero-intercept method implicitly includes a demand-related component, and the demand component of costs implicitly includes a customer-related component. While these effects tend to directionally offset, there is no guarantee that the zero-intercept method produces an unbiased classification factor. »

Demande :

- 1.1 Veuillez commenter la position de l'expert de l'ACIG quant au fait que la méthode de l'intercepte zéro pourrait inclure une portion capacité (« *demande related* ») dans la composante accès.

2. **Référence :** (i) C-ACIG-0028, p. 16.

Préambule :

« IS THE COMPANY'S PROPOSAL TO REPLACE THEIPC WITH THE HANDY WHITMAN ("H-W") INDEXES FOR COSTDEFLATING REASONABLE? »

It is common practice for utilities in the U.S to use the H-W indices for deflating costs. However, it is not clear that the indexes proposed by Gaz Métro are reasonable. By definition, these indexes do not apply to Québec costs denominated in Canadian dollars, as they were developed for the northeastern U.S. and are denominated in U.S. dollars.

Second, the H-W indexes appear to overstate cost inflation, particularly for Gaz Métro's steel mains. To evaluate this, I compiled the cost information presented in Exhibit B-0033 and totaled mains costs and footage by type of main, diameter of main, and by year. I then adjusted the yearly average cost per meter of main by main type for each year using the H-W index proposed

by the Company. (I also eliminated observations where less than 1,000 meters of a particular type and size main were constructed in a particular year, to reduce the impact of relatively small cost items.) I then reviewed the annual unit costs for each diameter and type of pipe for any observable trends. For both plastic and steel pipe, the inflation-adjusted mains costs generally decline over time, although the effect is much more pronounced for steel pipe. While there is considerable scatter in the results, the inflation-adjusted cost of steel pipe exhibits a noticeable and statistically significant downward trend for the major pipe diameter categories. A sample of the results is shown in Figure IEC-1 below, for the three major steel pipe diameter categories. »

Demandes :

- 2.1 Veuillez commenter sur le choix de l'indice H-W et sur l'impact de ce choix sur les composantes accès et capacité.
- 2.2 Veuillez développer sur l'impact qu'a le choix de cet indice sur les conduites d'acier et sur les conduites de plastique.

- 3. Références :**
- (i) C-ROEE-0039, p. 17;
 - (ii) C-ROEE-0039, p. 19;
 - (iii) C-ROEE-0039, p. 18;
 - (iv) C-ROEE-0039, p. 20;
 - (v) C-ROEE-0039, p. 18 et 20.

Préambule :

(i) «⁹ In addition, some of the incremental costs of the steel lines over the cost of plastic lines may be demand-related, to allow higher pressures. In my analysis, I have implicitly assumed that the existing mix of steel and plastic would be required for a system serving any mix of customers. In doing so, I have probably overstated the access-related portion of the system. »

(ii) ***Q: Have you been able to correct that third source of overstatement of the access-related cost?***

A: Yes. In Table 2, I summarize the results of a computation similar to that summarized in Table 1, but attributing to the access-related system only the portion of the incremental capacity in the line that would be carried by the 60-mm pipe. For example, for the 168-mm plastic pipe, the incremental cost over the next smaller (114-mm) pipe is \$17.40/m, which provides incremental capacity 10 times the capacity of a 60 mm pipe. Adding the load of the small customers who could be served with the 60 mm pipe would impose an average cost of just \$1.74/m. For the 953,548 m of 168-mm plastic pipe, the incremental cost of \$1.74/m would imply a cost of \$1,636,594 being due to the small-customer load.

(iii)

Table 1: Distribution Mains Classification, Large Lines First, Average Costs

| Type | Diameter (mm) | Length (m) | Cost (2012\$) | Cost/m (2012\$) | Relative Capacity (60mm = 1) | Access-Related Share | Access-Related Cost |
|------------------|---------------|------------|-----------------|-----------------|------------------------------|----------------------|---------------------|
| <i>Plastique</i> | 26.7 | 362 | \$56,317 | \$156 | 0.1 | 1.00 | \$56,317 |
| <i>Plastique</i> | 42.2 | 281,133 | \$44,206,158 | \$157 | 0.4 | 1.00 | \$44,206,158 |
| <i>Plastique</i> | 60.3 | 2,237,170 | \$382,430,716 | \$171 | 1.0 | 1.00 | \$382,430,716 |
| <i>Plastique</i> | 88.9 | 196,174 | \$35,465,496 | \$181 | 2.9 | 0.34 | \$12,202,441 |
| <i>Plastique</i> | 114.3 | 2,431,771 | \$500,702,692 | \$206 | 5.7 | 0.17 | \$87,527,862 |
| <i>Plastique</i> | 168.3 | 953,548 | \$218,293,188 | \$229 | 15.9 | 0.06 | \$13,762,816 |
| <i>Plastique</i> | 219.1 | 64,475 | \$15,145,998 | \$235 | 31.3 | 0.03 | \$484,380 |
| <i>Acier</i> | 21.3 | 0 | \$0 | | 0.1 | 1.00 | \$0 |
| <i>Acier</i> | 26.7 | 5,031 | \$1,530,574 | \$304 | 0.1 | 1.00 | \$1,530,574 |
| <i>Acier</i> | 33.4 | 28,106 | \$8,703,182 | \$310 | 0.2 | 1.00 | \$8,703,182 |
| <i>Acier</i> | 42.2 | 26,326 | \$8,338,659 | \$317 | 0.4 | 1.00 | \$8,338,659 |
| <i>Acier</i> | 48.3 | 97,293 | \$31,296,588 | \$322 | 0.5 | 1.00 | \$31,296,588 |
| <i>Acier</i> | 60.3 | 317,847 | \$105,319,106 | \$331 | 1.0 | 1.00 | \$105,319,106 |
| <i>Acier</i> | 88.9 | 201,668 | \$64,819,948 | \$321 | 2.9 | 0.34 | \$22,302,285 |
| <i>Acier</i> | 114.3 | 348,989 | \$129,219,640 | \$370 | 5.7 | 0.17 | \$22,588,892 |
| <i>Acier</i> | 168.3 | 310,381 | \$127,894,695 | \$412 | 15.9 | 0.06 | \$8,063,427 |
| <i>Acier</i> | 219.1 | 129,675 | \$70,880,203 | \$547 | 31.3 | 0.03 | \$2,266,801 |
| <i>Acier</i> | 273.1 | 6,865 | \$3,453,088 | \$503 | 54.5 | 0.02 | \$63,308 |
| <i>Acier</i> | 323.9 | 28,777 | \$14,619,940 | \$508 | 83.4 | 0.01 | \$175,368 |
| <i>Acier</i> | 406.4 | 11,270 | \$6,799,716 | \$603 | 145.3 | 0.01 | \$46,807 |
| <i>Acier</i> | 508 | 0 | \$0 | | 248.4 | 0.004 | \$0 |
| <i>Acier</i> | 610 | 0 | \$0 | | 382.8 | 0.003 | \$0 |
| <i>Acier</i> | 762 | 0 | \$0 | | 642.5 | 0.002 | \$0 |
| <i>Total</i> | | 7,676,861 | \$1,769,175,903 | \$273 | | 0.425 | \$751,365,687 |

(iv)

Table 2: Distribution Mains Classification, Large Lines First, Incremental Costs

| Type | Diameter (mm) | Length (m) | Cost (2012\$) | Cost/m (2012\$) | Relative Capacity (60mm = 1) | Incremental | | Access-Related Cost |
|------------------|---------------|------------|-----------------|-----------------|------------------------------|----------------|------------------------------|---------------------|
| | | | | | | Cost per meter | Capacity as multiple of 60mm | |
| <i>Plastique</i> | 26.7 | 362 | \$56,317 | \$156 | 0.1 | | | \$56,317 |
| <i>Plastique</i> | 42.2 | 281,133 | \$44,206,158 | \$157 | 0.4 | | | \$44,206,158 |
| <i>Plastique</i> | 60.3 | 2,237,170 | \$382,430,716 | \$171 | 1.0 | | | \$382,430,716 |
| <i>Plastique</i> | 88.9 | 196,174 | \$35,465,496 | \$181 | 2.9 | \$9.84 | 1.9 | \$1,012,717 |
| <i>Plastique</i> | 114.3 | 2,431,771 | \$500,702,692 | \$206 | 5.7 | \$25.11 | 2.8 | \$21,702,937 |
| <i>Plastique</i> | 168.3 | 953,548 | \$218,293,188 | \$229 | 15.9 | \$23.03 | 10.1 | \$2,165,274 |
| <i>Plastique</i> | 219.1 | 64,475 | \$15,145,998 | \$235 | 31.3 | \$5.99 | 15.4 | \$25,050 |
| <i>Acier</i> | 21.3 | 0 | \$0 | | 0.1 | | | \$0 |
| <i>Acier</i> | 26.7 | 5,031 | \$1,530,574 | \$304 | 0.1 | | | \$1,530,574 |
| <i>Acier</i> | 33.4 | 28,106 | \$8,703,182 | \$310 | 0.2 | | | \$8,703,182 |
| <i>Acier</i> | 42.2 | 26,326 | \$8,338,659 | \$317 | 0.4 | | | \$8,338,659 |
| <i>Acier</i> | 48.3 | 97,293 | \$31,296,588 | \$322 | 0.5 | | | \$31,296,588 |
| <i>Acier</i> | 60.3 | 317,847 | \$105,319,106 | \$331 | 1.0 | | | \$105,319,106 |
| <i>Acier</i> | 88.9 | 201,668 | \$64,819,948 | \$321 | 2.9 | -\$9.93 | 1.9 | \$0 |
| <i>Acier</i> | 114.3 | 348,989 | \$129,219,640 | \$370 | 5.7 | \$48.85 | 2.8 | \$6,058,110 |
| <i>Acier</i> | 168.3 | 310,381 | \$127,894,695 | \$412 | 15.9 | \$41.79 | 10.1 | \$1,279,066 |
| <i>Acier</i> | 219.1 | 129,675 | \$70,880,203 | \$547 | 31.3 | \$134.54 | 15.4 | \$1,132,342 |
| <i>Acier</i> | 273.1 | 6,865 | \$3,453,088 | \$503 | 54.5 | -\$43.60 | 23.3 | \$0 |
| <i>Acier</i> | 323.9 | 28,777 | \$14,619,940 | \$508 | 83.4 | \$5.04 | 28.8 | \$5,031 |
| <i>Acier</i> | 406.4 | 11,270 | \$6,799,716 | \$603 | 145.3 | \$95.31 | 61.9 | \$17,352 |
| <i>Acier</i> | 508 | 0 | \$0 | | 248.4 | | 103.1 | \$0 |
| <i>Acier</i> | 610 | 0 | \$0 | | 382.8 | | 134.5 | \$0 |
| <i>Acier</i> | 762 | 0 | \$0 | | 642.5 | | 259.7 | \$0 |
| <i>Total</i> | | 7,676,861 | \$1,769,175,903 | \$273 | | | | \$615,279,179 |

(v) Tableau créé par la Régie en combinant les tableaux 1 (référence (i)) et 2 (référence (ii)) cités en référence.

| Type/Diameter | Length | Cost (2012) | Cost/m (2012) | Relative Capacity (60mm = 1) | Access Related Share | Incremental | | Access Related Unitary Cost | Access Related Total Cost |
|-----------------------|------------------|-------------------------|---------------|------------------------------|----------------------|----------------|--------------------------------|-----------------------------|---------------------------|
| | | | | | | Cost per meter | Cumulative Cost (60 mm = Ref.) | | |
| | | | | | | ⑦ | ⑧ | | |
| ① | ② | ③ ② X ④ | ④ | ⑤ | ⑥ | ⑨ ⑥ X ⑧ | ⑩ ② X ⑨ | | |
| Plastique 26.7 | 362 | 56 317 \$ | \$156 | 0,1 | 1,00 | | | | 56 317,00 \$ |
| Plastique 42.2 | 281 133 | 44 206 158 \$ | \$157 | 0,4 | 1,00 | | | | 44 206 158,00 \$ |
| Plastique 60.3 | 2 237 170 | 382 430 716 \$ | \$171 | 1 | 1,00 | | | | 382 430 716,00 \$ |
| Plastique 88.9 | 196 174 | 35 465 496 \$ | \$181 | 2,9 | 0,34 | 9,84 \$ | 9,84 | 3,39 | 665 638,68 \$ |
| Plastique 114.3 | 2 431 771 | 500 702 692 \$ | \$206 | 5,7 | 0,18 | 25,11 \$ | 34,95 | 6,13 | 14 910 595,87 \$ |
| Plastique 168.3 | 953 548 | 218 293 188 \$ | \$229 | 15,9 | 0,06 | 23,03 \$ | 57,98 | 3,65 | 3 477 151,76 \$ |
| Plastique 219.1 | 64 475 | 15 145 998 \$ | \$235 | 31,3 | 0,03 | 5,99 \$ | 63,97 | 2,04 | 131 772,07 \$ |
| Acier 21.3 | 0 | 0 \$ | | 0,1 | 1,00 | | | | 0,00 \$ |
| Acier 26.7 | 5 031 | 1 530 574 \$ | \$304 | 0,1 | 1,00 | | | | 1 530 574,00 \$ |
| Acier 33.4 | 28 106 | 8 703 182 \$ | \$310 | 0,2 | 1,00 | | | | 8 703 182,00 \$ |
| Acier 42.2 | 26 326 | 8 338 659 \$ | \$317 | 0,4 | 1,00 | | | | 8 338 659,00 \$ |
| Acier 48.3 | 97 293 | 31 296 588 \$ | \$322 | 0,5 | 1,00 | | | | 31 296 588,00 \$ |
| Acier 60.3 | 317 847 | 105 319 106 \$ | \$331 | 1 | 1,00 | | | | 105 319 106,00 \$ |
| Acier 88.9 | 201 668 | 64 819 948 \$ | \$321 | 2,9 | 0,34 | -9,93 \$ | -9,93 | -3,42 | -690 539,05 \$ |
| Acier 114.3 | 348 989 | 129 219 640 \$ | \$370 | 5,7 | 0,18 | 48,85 \$ | 38,92 | 6,83 | 2 382 921,38 \$ |
| Acier 168.3 | 310 381 | 127 894 695 \$ | \$412 | 15,9 | 0,06 | 41,79 \$ | 80,71 | 5,08 | 1 575 525,19 \$ |
| Acier 219.1 | 129 675 | 70 880 203 \$ | \$547 | 31,3 | 0,03 | 134,54 \$ | 215,25 | 6,88 | 891 774,56 \$ |
| Acier 273.1 | 6 865 | 3 453 088 \$ | \$503 | 54,5 | 0,02 | -43,60 \$ | 171,65 | 3,15 | 21 621,60 \$ |
| Acier 323.9 | 28 777 | 14 619 940 \$ | \$508 | 83,4 | 0,01 | 5,04 \$ | 176,69 | 2,12 | 60 966,52 \$ |
| Acier 406.4 | 11 270 | 6 799 716 \$ | \$603 | 145,3 | 0,007 | 95,31 \$ | 272,00 | 1,87 | 21 097,32 \$ |
| Acier 508 | 0 | 0 \$ | | 248,4 | 0,004 | | | | |
| Acier 610 | 0 | 0 \$ | | 382,8 | 0,003 | | | | |
| Acier 762 | 0 | 0 \$ | | 642,5 | 0,002 | | | | |
| Total | 7 676 861 | 1 769 175 904 \$ | \$273 | | | | | | 605 329 826 \$ |
| POIDS - ACCÈS | | | | | | | | | 34,2% |

Demandes :

3.1 Veuillez présenter de quelle manière l'analyse peut être corrigée afin de tenir compte de la lacune invoquée quant à la pression plus élevée des conduites d'acier et par conséquent de leur capacité supérieure lorsque comparée aux conduites de plastique de même diamètre (référence (i)).

- 3.2 Veuillez recalculer le même tableau qu'en référence (iv) mais en prenant la conduite de 26,7 mm au lieu du 60 mm comme point de référence. Veuillez commenter vos résultats, notamment en ce qui a trait à l'établissement de la composante accès à partir des coûts marginaux et en lien avec les économies d'échelle.
- 3.3 Veuillez confirmer si le coût supplémentaire de 17,40 \$/m (passage de 114,3 mm à 168,3 mm) cité en référence (ii) ne devrait pas plutôt s'élever à 23,03 \$/m présenté en référence (iv). Suivant le même raisonnement, veuillez confirmer si le 1,74 \$/m ne devrait pas plutôt s'élever à 2,30 \$/m et le coût total devrait être 2 165 274 \$ au lieu de 1 636 594 \$.
- 3.4 Veuillez expliquer la colonne « *Capacity as multiple of 60 mm* ». Veuillez indiquer si les valeurs qui se retrouvent dans cette colonne ne représentent pas un multiple du diamètre *X* par rapport au diamètre 60 mm, mais plutôt un multiple du diamètre *X* par rapport au diamètre inférieur. Dans l'affirmative, veuillez expliquer pourquoi ce multiple n'est pas calculé par rapport au 60 mm.
- 3.5 Veuillez répondre à la sous-question précédente mais en prenant la colonne « *Cost per meter* ».
- 3.6 La Régie a élaboré le tableau en référence (v), en utilisant les concepts présentés aux Tableaux 1 et 2 (références (iii) et (iv)). Veuillez commenter la méthode employée par la Régie lorsqu'elle combine l'« *Access-Related Share* » du tableau 1 (colonne 6) avec le « *Cost per meter* » du tableau 2 (colonne 7). Veuillez commenter les résultats de la colonne 10 (Il est à noter que ces calculs ont été effectués en prenant comme référence le 60 mm).
4. **Référence :** (i) Pièce C-ACIG-0028, page C2.
(ii) C-ROÉÉ-0039, p. 12

Préambule :

- (i) « *However, the obvious difficulty with this framework is that fixed costs are fixed, and there is not a strong theoretical basis for allocating those costs based on number of customers, peak demand, commodity throughput, or any other arbitrary factor. While there may be rate design advantages to recovering fixed costs with a customer charge, there is no cost causation reason for allocating truly fixed costs based on number of customers. This basic argument is often advanced by cost allocation practitioners who oppose zero-intercept or minimum system methods.* »
- (ii) « *Q: What alternative approaches exist for classifying the costs of the area spanning system?* »

A: There are at least two approaches. One approach, which is used in many jurisdictions, is to treat all the area-spanning costs as demand-related to reflect the reality that the system is built out primarily to serve load, not customer number. »

Demandes :

- 4.1 Veuillez donner votre opinion sur le texte de la référence (i).
- 4.2 Veuillez indiquer si l'approche que vous évoquez à la référence (ii), constitue une solution pour tenir compte des éléments soulevés à la référence (i).
- 4.3 Veuillez indiquer les motifs invoqués par les organismes réglementaires qui ont retenu l'approche de la référence (ii). Veuillez donner des références précises.