

February 7<sup>th</sup>, 2012

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27th Floor,  
Toronto, ON M4P 1E4

***Via RESS, Electronic Mail and Courier***

Dear Ms. Walli:

**Re: EB-2011-0242 and EB-2011-0283, Renewable Natural Gas (“RNG”) Program Application**

Just Energy Ontario L.P. (“Just Energy”) respectfully submits the following Interrogatories for the above referenced application before the Ontario Energy Board (“OEB” or “the Board”) as submitted by Enbridge Gas Distribution Inc. (“EGD”) and Union Gas Ltd. (“Union”), collectively referred to as “the Applicants”, on September 30<sup>th</sup>, 2011.

Should you have any questions or comments in response to these Interrogatories please do not hesitate to contact Nola Ruzycski, Vice President Regulatory Affairs Canada, or Brandon Ott, Manager Regulatory Affairs Canada.

Yours truly,



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Intervenors

**Just Energy Interrogatories:**  
**RE: EB-2011-0242 and EB-2011-0283, Renewable Natural Gas (“RNG”) Program Application**

**Just Energy #1**

**Issue 1.2**

**Reference Exhibit B, Tab 1, Pages 11 and 15**

The Applicants assert that, “The emerging RNG industry requires a foundation to be built over a longer-term horizon so that a viable market can develop.” The Applicants also go on to state that, “In the absence of RNG prices and a supporting program, the development of this market is unlikely in the next several years.”

1. How do the Applicants define the term ‘market’ in the context used above?
2. Do the Applicants see the dynamics of an RNG ‘market’ within the program described in their joint Application?
3. Do the Applicants generally support the development of a competitive RNG market with a basis in the principles of economic efficiency?
4. Please describe how the Applicants envision a future competitive market for RNG to develop from the proposed program.
5. Please describe how the Applicants envision a future competitive market for RNG to function.

**Just Energy #2**

**Issue 1.0**

**Reference Exhibit B, Tab 1 - General**

Please reference any legislation, regulation, Ministerial Directive, Order, or Code of the Ontario Energy Board that mandates the Applicants to:

1. maintain a supply portfolio that is inclusive of RNG;
2. offer long term contracts to RNG suppliers; and
3. assist or facilitate the creation of a viable RNG market.

**Just Energy #3**

**Issue 1.0**

**Reference Exhibit B, Tab 1 - General**

Please confirm whether or not either of the Applicants or affiliates of the Applicants have entered into discussions regarding an agreement with parties interested in becoming RNG suppliers to assist in some material way in the construction, development, operations or maintenance of any RNG facility. If such discussions have taken place, please provide further details in the form of exchanged communications, draft agreements, letters of intent or similar documents. If such discussions have not yet taken place, please advise of any barriers that may prevent affiliates of the Applicants from entering into aforementioned facility agreements after such a time as long-term RNG supply agreements have been executed between suppliers and the Applicants following approval of this Application.