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March 21, 2012

BY EMAIL & COURIER

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge St, Suite 2701  
Toronto ON M4P 1E4

Dear Ms. Walli:

**Board File No. EB-2011-0242 & EB-2011-0283**  
**Enbridge Gas Distribution Inc. and Union Gas Limited**  
**Renewable Natural Gas Program – Interrogatories of Energy Probe**

Pursuant to the Procedural Order No. 4, issued by the Board on March 2, 2012, attached please find the Interrogatories of Energy Probe Research Foundation (Energy Probe) in respect of the Bullfrog Power filing dated March 2, 2012 in the EB-2011-0242 & EB-2011-0283 proceeding.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh  
Case Manager

cc: Norm Ryckman, Enbridge Gas Distribution Inc. (By email)  
Fred D. Cass, Aird & Berlis LLP (By email)  
Karen Hockin, Union Gas Limited (By email)  
Alexander Smith, Torys LLP (By email)  
Norm Rubin, Consultant to Energy Probe (By email)

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Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

Phone: (416) 964-9223 Fax: (416) 964-8239 E-mail: EnergyProbe@nextcity.com Internet: www.EnergyProbe.org

**Ontario Energy Board**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B; and in particular section 36 (2) thereof;

**AND IN THE MATTER OF** an application by Enbridge Gas Distribution Inc. for an Order or Orders approving and setting the cost consequences associated with the purchase of Ontario biomethane by Enbridge Gas Distribution Inc.;

**AND IN THE MATTER OF** an application by Union Gas Limited for an Order or Orders approving and setting the cost consequences associated with the purchase of Ontario biomethane by Union Gas Limited.

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**WITNESS STATEMENT OF TOM HEINTZMAN  
CO-FOUNDER AND PRESIDENT OF BULLFROG POWER INC.**

**INTERROGATORIES OF  
ENERGY PROBE RESEARCH FOUNDATION  
("ENERGY PROBE")**

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**March 21, 2012**

**WITNESS STATEMENT OF TOM HEINTZMAN  
CO-FOUNDER AND PRESIDENT OF BULLFROG POWER INC.**

**EB-2011-0242 & EB-2011-0283**

**ENERGY PROBE RESEARCH FOUNDATION  
INTERROGATORIES**

**Interrogatory #1**

**Ref: Witness Statement of Tom Heintzman**

**Upon review of the Witness Statement of Tom Heintzman, Co-Founder and President of Bullfrog Power Inc., the material submitted as “evidence” for this proceeding appears to be a mixture of a description of the goodness of Bullfrog Power, a lesson on the concept of Environmental Attributes, a description of the business of Bullfrog Power and argument submitted in respect of the outcomes Bullfrog Power desires at the conclusion of the proceeding.**

**For clarification, please designate by paragraph number the parts of the Witness Statement which Bullfrog Power believes to be evidence in this proceeding.**

**Interrogatory #2**

**Ref: Witness Statement of Tom Heintzman, Paragraphs 16 -19**

**In Paragraphs 16 to 19, the Witness Statement explores the *Role of voluntary consumer choice*, in particular the benefits to be achieved through the co-existence of a compliance program and a voluntary market.**

**Since there is not a compliance biomethane or renewable natural gas market in Ontario, would it not enhance the *Role of voluntary consumer choice* to provide customers with the choice to either purchase and pay for biomethane or not to purchase or pay for biomethane?**

**Interrogatory #3**

**Ref: Witness Statement of Tom Heintzman, Paragraph 27**

**In Paragraph 27, the Witness Statement asserts, “The pricing for the RNG should be set as aggressively as possible while still permitting the development of RNG facilities.”**

**Is it the position of Bullfrog Power that the price for RNG should include financial support in the form of subsidies from Enbridge Gas Distribution and Union Gas Limited?**

**Interrogatory #4**

**Ref: Witness Statement of Tom Heintzman, Paragraph 27**

**In Paragraph 27, the Witness Statement refers to the dreaded Ontario *feed-in tariff price* subsidy system in reference to renewable electricity.**

**Is it the position of Bullfrog Power that Ontario could adopt a similar subsidy system for RNG without suffering similar rapidly rising commodity cost consequences?**