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By electronic filing

March 21, 2012

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th floor
Toronto, ON M4P 1E4

Dear Ms Walli,

Union Gas Limited		Enbridge Gas Distribution Inc.	
Renewable Natural Gas Application		Renewable Natural Gas Application	
Board File No.:	EB-2011-0283	Board File No.:	EB-2011-0242
Our File No.:	339583-000121		

Please find attached the Interrogatories of Canadian Manufacturers & Exporters (“CME”) for Bullfrog Power Inc. (“Bullfrog”).

Yours very truly,

Peter C. P. Thompson, Q.C.

\slc
enclosure

- c. Tom Heintzman (Bullfrog)
- Karen Hockin (Union)
- Alexander Smith (Torys LLP)
- Norm Ryckman (EGD)
- Fred Cass (Aird & Berlis LLP)
- Interested Parties EB-2011-0242 and EB-2011-0283
- Paul Clipsham (CME)

OTT014987814v1

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 14, 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 Ontario renewable natural gas prices for Enbridge Gas Distribution Inc.'s purchase of renewable natural gas;

AND IN THE MATTER OF an application by Union Gas Limited for an Order or Orders approving and setting Ontario renewable natural gas prices for Union Gas Limited's purchase of renewable natural gas.

**INTERROGATORIES OF
CANADIAN MANUFACTURERS & EXPORTERS (“CME”)
TO BULLFROG POWER INC. (“BULLFROG”)**

Reference: Evidence paras.7 and 9

1. How many of the 8,000 residential customers and 1,200 businesses under contract to Bullfrog are gas-only customers?
2. How many more residential consumers and businesses does Bullfrog estimate that it can attract to Renewable Natural Gas (“RNG”) year-by-year for the next 5-years?
3. Please provide a sample of Bullfrog's standard contract whereby a gas consumer agrees to acquire RNG.
4. What is the average duration of the contracts that Bullfrog currently has with its existing gas-only customers?
5. What is the duration of the contracts that Bullfrog asks potential gas-only customers to sign when those customers are seeking to either displace or supplement the natural gas commodity they currently acquire from other suppliers?
6. What is the heat content of the RNG that originates in the facilities of Bullfrog and how does the heat content of that supply compare to the heat content of natural gas distributed in Ontario?
7. Please provide a sample invoice between Bullfrog and one of its 1,200 business customers who acquires RNG only and show how the product is invoiced to the customer

so as to extract a premium above the market price for natural gas commodity delivered by the distribution utility serving the customer.

8. Please list all of the RNG facilities in which Bullfrog has an ownership and/or operation interest.
9. Where are Bullfrog's RNG facilities located?
10. Where are Bullfrog's RNG customers located in relation to the source of the RNG supply?
11. What is the total production capacity of the RNG facilities in which Bullfrog has an ownership and/or operation interest?
12. Where is Bullfrog's RNG injected into the TransCanada PipeLines Limited ("TCPL") system and what regulatory approvals did Bullfrog obtain to connect its RNG production with the TCPL system? When describing the connection between the RNG facilities and the TCPL system, please indicate when regulatory approvals for the connection facilities were granted and provide details of the regulatory tribunal that granted the approvals for such connection facilities.
13. What is the total volume of RNG that Bullfrog has under contract to satisfy the demands of the residential consumers and businesses that it serves?
14. Please explain how Bullfrog was able to develop RNG facilities without the need for any large volume long-term anchor contracts with distribution utilities and/or other gas marketers.
15. Based on the contractual commitments it has in hand to date, are the RNG production facilities of Bullfrog economically viable over the longer term?