



## Jay Shepherd

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**BY EMAIL and RESS**

August 29, 2016  
Our File: EB20160186

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario  
M4P 1E4

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2016-0186– Union Panhandle Reinforcement Project – SEC Interrogatories**

We are counsel to the School Energy Coalition (“SEC”). Enclosed, please find interrogatories on behalf of SEC.

Yours very truly,  
**Jay Shepherd P.C.**

*Original signed by*

Mark Rubenstein

cc: Wayne McNally, SEC (by email)  
Applicant and intervenors (by email)

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**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*,  
S.O. 1998, c. 15, Sched. B, as amended;

**AND IN THE MATTER of the OF** the *Ontario Energy Board Act, 1998*,  
S.O. 1998, c. 15, Sched. B, and in particular, s.36 thereof;

**AND IN THE MATTER OF** an Application by Union Gas Limited for an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in the Township of Dawn Euphemia, Township of St. Clair and the Municipality of Chatham-Kent;

**AND IN THE MATTER OF** an Application by Union Gas Limited for an Order or Orders for approval of recovery of the cost consequences of all facilities associates with development of the proposed Panhandle Reinforcement Pipeline Project.

**INTERROGATORIES**

**ON BEHALF OF THE**

**SCHOOL ENERGY COALITION**

**1-SEC-1**

[A] Please provide copies of all materials that were provided to Union's senior management team, and if applicable, its parent company's Board of Directors, for the approval to undertake, either collectively or individually, any aspects of the capital projects that underlie this application.

**1-SEC-2**

[A] Please provide a copy of any internal business case created for this project.

**1-SEC-3**

[A-4-3] Please provide a version of this schematic diagram showing peak day capacity and flow direction.

**1-SEC-4**

[A-6, p.5] Please provide details regarding the avoided future integrity costs for the NPS 16 pipeline from Dawn to Dover by construction of the proposed facilities. Please quantify those avoided integrity costs.

**2-SEC-5**

[A-7] Please provide schedule 3-6 in Microsoft Excel format with inputs and formulas intact.

**2-SEC-6**

[A-7-3] Please provide a similar schedule showing calculation of distribution revenue margins.

**2-SEC-7**

[A-7-5] Regarding the Stage 2 fuel savings calculations:

- a. Please provide the source or basis for the assumptions used for the fuel mix for general service and contract customers.
- b. Please provide the gas and alternative fuel price data used and the source of that information.

**3-SEC-8**

[A-3, p.6-8] Please describe all discussions Union has had with the Government of Ontario, subsequent to the release of the Climate Change Action Plan, regarding its content. Please provide copies of all such communications and any documents exchanged.

**3-SEC-9**

[A-3, p.7] Union states that the “choice of 20 years recognizes the changes being proposed by 2030 (when the CCAP indicates changes to the building code will be made for new small buildings “net carbon zero” targets) and is based on management’s judgments.”

- a. Please explain why Union believes the changes to the building codes regarding new small buildings will be the specific cause of risk to utilization of the proposed project that would require such a large change in the useful life of the asset.
- b. Please provide Union’s forecast of Panhandle System demand, with and without the impact of the CCPA, for each year between 2017 and 2037. If Union has not undertaken a forecast to date, please provide an estimate. Please provide all assumptions made.
- c. Please explain what considerations were made by management in undertaking its judgement.

**3-SEC-10**

[A-7-1] Please provide the basis for the capital cost estimates set out in Schedule 1.

**3-SEC-11**

[A-8-6] Please provide a similar schedule showing bill impacts of the proposed project using the 2013 Board-Approved cost allocation methodology instead of the proposed allocation.

**4-SEC-12**

[A-4, p.5] Please provide details regarding the two ex-franchise shippers who have transportation contracts from Ojibway to Dawn. Please explain why Union cannot rely on these volumes when designing the system.

**4-SEC-13**

[A-6, p.9] Please provide a copy of all communications with Panhandle Eastern Pipeline Company regarding incremental deliveries to Ojibway.

Respectfully submitted on behalf of the School Energy Coalition this 29<sup>th</sup> day of August, 2016.

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy  
Coalition