

Osler, Hoskin & Harcourt LLP
Box 50, 1 First Canadian Place
Toronto, Ontario, Canada M5X 1B8
416.362.2111 MAIN
416.862.6666 FACSIMILE

OSLER

Toronto

September 20, 2017

Patrick G. Welsh
Direct Dial: 416.862.5951
pwelsh@osler.com
Our Matter Number: 1144688

Montréal

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Ottawa

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
27-2300 Yonge Street
Toronto, ON M4P 1E4

Vancouver

New York

Dear Ms. Walli:

re: EB-2017-0108 (Application for certificates of public convenience and necessity for Norfolk County, the County of Elgin, and the County of Middlesex)

re: Interrogatories of Natural Resource Gas Limited

In accordance with Procedural Order No. 1 dated September 6, 2017, please find enclosed the written interrogatories of Natural Resource Gas Limited in the above proceeding.

Should you have any questions or require any additional information, please do not hesitate to contact me.

Yours very truly,



Patrick G. Welsh
PW:

Enclosure
c (email only):

Patrick McMahon (pmcmahon@uniongas.com), *Union Gas Limited*
Bruce Brandell (bbrandell@epcor.com) and Britt Tan (btan@epcor.com), *EPCOR Utilities Inc.*
Scott Lewis (slewis@tributeresources.com), *OM Limited Partnership*

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Municipal Franchises Act*, R.S.O. 1990, c. M.55, as amended (the “Act”);

AND IN THE MATTER OF an Application by Union Gas Limited for an Order under section 8 of the Act amending Union Gas’ authorizations to construct gas works and supply gas in Norfolk County, the County of Elgin and the County of Middlesex.

**INTERROGATORIES OF
NATURAL RESOURCE GAS LIMITED**

September 20, 2017

OSLER, HOSKIN & HARCOURT LLP
Box 50, 1 First Canadian Place
Toronto, ON M5X 1B8

Patrick G. Welsh
Tel: 416.862.5951
Fax: 416.862.6666
pwelsh@osler.com

Counsel for Natural Resource Gas Limited

1. ***Norfolk County***

Reference: Application of Union Gas Limited (“Union”), p. 3

“Union submits that revised Certificates [of Public Convenience and Necessity] should be issued to both NRG and Union for Norfolk County to avoid any confusion going forward. Union submits that these Certificates should make specific references to the areas within Norfolk County served by NRG.”

- (a) Please provide the exact locations, by specific reference to lot number or municipal address, all areas where Union has constructed works to supply natural gas, or otherwise has assets, in Norfolk County.

2. ***County of Elgin***

Reference: Application, p. 4

“Union currently has a significant level of assets in place along County of Elgin roads related to the F.B.C. 259 Certificate.”

- (a) Please provide the exact locations, by specific reference to lot or municipal address, all areas where Union has “a significant level of assets in place along County of Elgin roads” or any other area where Union has constructed works to supply natural gas or otherwise has assets, in the County of Elgin.

3. ***County of Middlesex***

Reference: Application, p. 5

“Union currently has a significant level of assets in place along County of Middlesex roads related to the F.B.C. 259 and EB-2008-0309 certificates.”

- (a) Please provide the exact locations, by specific reference to lot or municipal address, all areas where Union has “a significant level of assets in place along County of Middlesex roads” or any other area where Union has constructed works to supply natural gas or otherwise has assets, in the County of Middlesex.