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September 20, 2017

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

Dear Ms. Walli:

**Re: Union Gas Limited
Application to Amend Union Gas Limited's Certificates of Public
Convenience and Necessity for Norfolk County, the County of Elgin and
the County of Middlesex
Board File Number EB-2017-0108**

Please find attached OEB staff's interrogatories in the above-noted proceeding.

Yours truly,

Original signed by

Azalyn Manzano
Case Manager

/ attach.

UNION GAS LIMITED

Application to amend Union Gas Limited's certificates of public convenience and necessity for Norfolk County, the County of Elgin and the County of Middlesex

EB-2017-0108

OEB STAFF INTERROGATORIES

Norfolk County

Interrogatory 1

Ref: Evidence, page 1, paragraph 3

Preamble:

OEB staff's reading of F.B.C. 259 is that Union Gas Limited (Union Gas) is able to serve only the following areas in the following former Townships in Norfolk County:

- Former Township of Houghton:
 - All of Gore Lot "A".
 - The north half of Gore Lot "B".
- Former Township of Middleton:
 - The south quarters of Lots 1 and 2, north of Colonel Talbot Road (Talbot Street).
 - The whole of Lots 1 and 2 between Colonel Talbot Road (Talbot Street) and Concession Road 1 South.
- Former Township of North Walsingham:
 - The whole of Lot 1 in each of Concessions 11, 12, 13 and 14.
 - The whole of Lot 1 in Concession 10, save and except all of the southerly 200 feet of the said Lot except the westerly 200 feet of the said southerly 200 feet.
 - The whole of Lot 1 in Concession 9, save and except all of the northerly 200 feet of the said lot except the westerly 200 feet of the said northerly 200 feet.
 - The whole of Lots 1 in each of Concessions 7 and 8.
 - The south halves of each of Lots 2, 3, 4 and 5 in Concession 7.
- Former Township of South Walsingham:
 - The whole of Lots 1, 2, 3, 4 and 5, in each of Concessions 1, 2, 3, 4, 5 and 6.
 - The whole of Lots 1, 2, 3, 4 and 5, in each of Ranges A and B.
 - The whole of Marsh Lots 1, 2, 3, 4 and 5.

- The whole of Gore Lot E, in Concession 3.
- The whole of Gore Lot D in Concession 2.
- The whole of Gore Lot C in Concession 1.
- The whole of Gore Lot B, in Range A.
- The whole of Gore Lot A, in Range B.

Questions:

- a) Please confirm that with respect to the Townships of Houghton, Middleton, North Walsingham and South Walsingham, Union Gas has a certificate of public convenience and necessity (certificate) to serve only the areas listed above. If this is not the case, and Union has interpreted F.B.C. 259 differently, please explain why.
- b) Has Union Gas constructed works in parts of the Townships of Houghton, Middleton, North Walsingham and South Walsingham other than the areas listed above?

Interrogatory 2

Ref: Evidence, Schedules C and D

Preamble:

Union Gas is requesting that the OEB cancel parts of F.B.C. 259 related to the former County of Norfolk held by Union Gas, and E.B.C. 111 and 119 related to the former Township of Norfolk that were in the former Townships of Houghton, Middleton, North Walsingham and South Walsingham held by Natural Resource Gas Limited (NRG), and supersede them by issuing utility-specific certificates.

Questions:

- a) Union Gas' draft revised certificate presented in Schedule C includes locations previously excluded from F.C.B. 259. Please provide the rationale for those locations being included in the new certificate.
- b) Union Gas' draft revised certificate presented in Schedule D suggests a listing of locations to be included in NRG's certificate. Please provide the rationale for those locations being included in the new certificate.
- c) Is Union planning any customer additions/expansions within Norfolk County?

- d) For areas currently without natural gas service within Norfolk County, is Union Gas proposing to include these areas in their certificate for Norfolk County? If so, why?
- e) Please provide a draft revised certificate for Norfolk County, based only on the areas where Union Gas currently has service.
- f) Please confirm that Union Gas holds certificates for the rest of the area within Norfolk County other than the area covered by the former Townships of Houghton, Middleton, North Walsingham and South Walsingham.

Interrogatory 3

Ref: Evidence, Schedule E

Preamble:

Union filed a revised application which includes a redacted, public version of Union Gas' service area map in Norfolk County.

Question:

- a) The map provided in Schedule E shows an orange area that is not mentioned in the legend. Please explain what the orange area is meant to indicate.
- b) Please provide a map of Norfolk County which clearly marks and includes the following information:
 - the boundaries of Norfolk County;
 - the boundaries of former municipalities within Norfolk County;
 - Union Gas' infrastructure in the County;
 - the areas currently served by Union Gas within Norfolk County, including the lot and concession numbers; and
 - Union Gas' customer count and/or customer density within Norfolk County.
- d) Is Union Gas aware of any areas in Norfolk County where both Union Gas and NRG infrastructure is located? If so, please provide a map delineating which areas.

County of Elgin

Interrogatory 4

Ref: Evidence, page 3

Preamble:

Union Gas states that it holds a certificate (F.B.C. 259) for the County of Elgin and that it has a significant level of assets in place along County of Elgin roads related to F.B.C. 259.

Questions:

- a) Please provide a map of the County of Elgin which clearly marks and includes the following information:
 - the boundaries of the County of Elgin;
 - the boundaries of municipalities within the County of Elgin;
 - Union Gas' infrastructure in the County of Elgin;
 - the areas currently served by Union within the County of Elgin, including the lot and concession numbers; and
 - Union Gas' customer count and/or customer density within the County of Elgin.
- b) Is Union Gas aware of any areas in the County of Elgin where both Union Gas and NRG infrastructure is located? If so, please provide a map delineating which areas.
- c) Is Union Gas planning any customer additions/expansions within the County of Elgin?
- d) For areas currently without natural gas service within the County of Elgin, is Union Gas proposing to include these areas in their certificate for the County of Elgin? If so, why?
- e) Please confirm that Union Gas has certificates and franchise agreements for the lower-tier municipalities within the County of Elgin.
- f) Please confirm that Union Gas is not serving any customers in any lower-tier municipalities within the County of Middlesex that it currently does not hold a lower-tier certificate for.

- g) Please provide draft revised certificates for the lower tier municipalities within the County of Elgin, based only on the areas where Union Gas currently has service.

County of Middlesex

Interrogatory 5

Ref: Evidence, page 4

Preamble:

Union Gas states that it holds a certificate for the County of Middlesex (F.B.C. 259 and EB-2008-0309) and that it has a significant level of assets in place along County of Middlesex roads related to F.B.C. 259 and EB-2008-0309.

Questions:

- a) Please provide a map of the County of Middlesex which clearly marks and includes the following information:
- the boundaries of the County of Middlesex;
 - the boundaries of municipalities within the County of Middlesex;
 - Union Gas' infrastructure in the County of Middlesex;
 - the areas currently served by Union within the County of Middlesex, including the lot and concession numbers; and
 - Union's customer count and/or customer density within the County of Middlesex.
- b) Is Union Gas aware of any areas in the County of Middlesex where both Union Gas and NRG infrastructure is located? If so, please provide a map delineating which areas.
- c) Is Union Gas planning any customer additions/expansions within the County of Middlesex?
- d) For areas currently without natural gas service within the County of Middlesex, is Union Gas proposing to include these areas in their certificate for the County of Middlesex? If so, why?
- e) Please confirm that Union Gas has certificates and franchise agreements for the lower-tier municipalities within the County of Middlesex.

- f) Please confirm that Union Gas is not serving any customers in any lower-tier municipalities within the County of Middlesex that it currently does not hold a lower-tier certificate for.
- g) Please provide draft revised certificates for the lower tier municipalities within the County of Middlesex, based only on the areas where Union Gas currently has service.