PETER C.P. THOMPSON, Q.C. direct tel.: (613) 787-3528 e-mail: pthompson@blgcanada.com

Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street 27<sup>th</sup> floor Toronto ON M4P 1E4

Dear Ms Walli,

May 1, 2009

Union Gas Limited ("Union")
2008 Deferral Account Balances
Board File No.: EB-2009-0052
Our File No.: 339583-000041

We enclose the Interrogatories of Canadian Manufacturers & Exporters ("CME") seeking information not already requested by Mr. Aiken and Mr. Gruenbauer.

Please contact me if you require any further information.

Yours very truly,

Peter C.P. Thompson, Q.C.

PCT\slc enclosure

c. Intervenors EB-2009-0052 Paul Clipsham (CME)

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Filed: 2009-05-01 EB-2009-0052

**IN THE MATTER OF** the *Ontario Energy Board Act 1998*, S.O. 1998, c.15, (Schedule B) (the "*Act*");

**AND IN THE MATTER OF** an Application by Union Gas Limited for an order or orders amending or varying the rate or rates charged to customers as of July 1, 2009.

## Interrogatories of Canadian Manufacturers & Exporters ("CME") to Union Gas Limited ("Union")

## Ref: Exhibit A, Tab 1, pages 5 and 6

- 1. CME seeks to verify that the storage revenues recorded in Deferral Accounts 179-70 and 179-72 reconcile with the storage revenues recorded in the Financial Statements of Union Gas Limited ("Union") for the 12 months ending December 31, 2008. In this connection, please provide the following information:
  - (a) A copy of Union's Financial Statement for the year ending December 31, 2008;
  - (b) The total amount recorded in the Financial Statement for storage revenues;
  - (c) The total amount of Financial Statement storage revenues attributable to non-utility and utility activities shown separately;
  - (d) A breakdown of the Financial Statement storage revenues attributable to utility activities between:
    - (i) Short-Term Storage and Other Balancing Services;
    - (ii) Long-Term Peak Storage Services; and
    - (iii) Any other categories of utility storage revenues.
  - (e) Reconcile the above amounts with the following:
    - (i) The Short-Term balances recorded in Deferral Account 179-70 described at lines 4 to 12 of Exhibit A, Tab 1, page 6; and
    - (ii) The actual net Long-Term Peak Storage Services revenues described in Exhibit A, Tab 1 at page 6, line 21 to page 7, line 2.