

IN THE MATTER of the *Ontario Energy Board Act 1998*, Schedule B to the *Energy Competition Act*, 1998, S.O. 1998, c.15;

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 the School Energy Coalition

1. Ref. Exhibit A, Tab 1, p. 7 and Exhibit A, Tab 1, Schedule 2: LRAM Adjustment Mechanism

The evidence [Ex. A, Tab 1, p. 7] states that the balance in the Lost Revenue Adjustment Mechanism is a credit of \$0.421 million. This appears to be made up of a credit of \$1.282 million for 2007 audited results offset by a debit of \$0.861 million for unaudited 2008 results. The 2008 results appear to be calculated by multiplying the unaudited volume reductions multiplied by the 2008 delivery rates without any corresponding offset to account for the volume reduction already included in rates. Union states in the evidence [at Ex. A, Tab 1, p. 8] that "there were no 2008 DSM volumes included in 2008 rates."

Please:

- (a) Confirm the above synopsis is correct.
 - (b) Ex. A, Tab 1, Sc. 2, p. 2, column (c) appears to show the 2007 lost volumes in 2008 rates. Does this refer to the assumed impact in 2008 from DSM activities undertaken in 2007?
 - (c) Provide the basis for the statement that "there were no 2008 DSM volumes included in 2008 rates" given that the Board in EB-2006-0021 approved \$17 million in DSM expenditures for 2008.
2. Ref. Ex. A, Tab 1, p. 9-10: DSMVA
 - (a) With respect to the Demand Side Management Variance Account, please explain what specific programs the additional \$1.559 million was used towards.
3. Ref. Ex. A, Tab 1, p. 10: Late Payment Penalty Litigation

- (a) Please provide a breakdown of the costs recorded to this account. Please state whether the costs are internal or external costs. For internal costs, please state how they were calculated.