

**EB-2009-0101**

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

**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 in connection with the sharing of 2008 earnings under the incentive rate mechanism approved by the Ontario Energy Board on January 17, 2008.

**INTERROGATORIES OF  
THE FEDERATION OF RENTAL-HOUSING PROVIDERS OF ONTARIO  
FOR UNION GAS LIMITED**

Interrogatory # 1

Ref: Exhibit A, Page 1 and 12, 13

*For the purposes of the earnings sharing mechanism, Union shall calculate its earnings using the regulatory rules prescribed by the Board from time to time, and shall not make any material changes in accounting practices that have the effect of reducing utility earnings.*

Please provide Union's specific rationale for why the Unbilled Customer Charge Revenue Adjustment is exempted from the specific commitment not to change accounting practices to reduce earnings as part of the Settlement Agreement.

Interrogatory # 2

Ref: EB-2009-0052 B3.1

Preamble: In EB-2009-0052, FRPO was attempting to understand the calculation of balances that contribute Account No. 179-90 Short-Term Storage and Other Balancing Services and Account No. 179-72 Long-Term Peak Storage Services as their balances affect the resulting earnings provided by Union in EB-2009-0101. To provide clarity for the purpose of understanding the calculations performed by Union, the following questions are submitted:

For attachment 1, please expand the table to present the additional detail showing line items for:

- The long-term commodity costs: UFG and compressor fuel, net of customer supplied fuel.
- The long-term demand costs: O&M, depreciation, and property and capital tax.
- The long term asset costs: interest, return and income tax for unregulated assets.

For each variance, please provide an explanation as to the source of the variance and Union's expectation for a continuation of that effect in 2009 and 2010.

For attachment 2, please expand the table to present the additional detail showing line items for:

- The short-term commodity costs: unaccounted for gas ("UFG") and compressor fuel.
- The short-term demand costs: operating and maintenance ("O&M"), depreciation, property & capital tax, interest, income taxes, deferred tax drawdown and return.

If variance is not a helpful , please provide an explanation as to the source of the 2008 numbers and Union's expectation for a continuation of that level in 2009 and 2010.

Further, please provide a verbal explanation of the process of moving these assets from rate base to ST Services and demonstrate how Union is not recovering the cost in any utility service.

Interrogatory #3

Ref: EB-2009-0101 Exhibit A, Appendix A, Schedule 11

For the Schedule 11, please provide the detail as requested in Interrogatory #2 above identifying and quantifying the demand and commodity line items and describing the source of variance where appropriate. Further, please provide Union's forecast for 2009 and 2010 for each of those respective line items.