

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*;

**AND IN THE MATTER OF** an application by Union Gas Limited for approval of its 2010 Natural Gas Demand Side Management Plan.

**Industrial Gas Users Association (IGUA)  
Interrogatories for Union Gas Limited (Union)**

1. *Reference: 2010 DSM Plan, p.4 and Table 1.* IGUA notes that Enbridge Gas Distribution, in its 2010 DSM Plan, has provided definitive budget breakdown as between customer segments [EB-2009-0154, Ex. B/2]. Please provide Union's best current forecast of DSM budget costs to be allocated to each customer class identified in the referenced table 1.
2. *Reference: 2010 DSM Plan, p. 4 and Table 1.* Please provide DSM budget costs allocated to each customer class identified in the referenced table for each of the 2009, 2008 and 2007 program years.
3. *Reference: 2010 DSM Plan, p. 4 and Table 1.*
  - (a) Please confirm that industrial distribution customers are included in both the "Commercial" and the "Distribution Contract" categories on the referenced table.
  - (b) Please explain the rationale for collapsing of commercial and industrial customers into homogeneous contract and non-contract customer segments for DSM purposes.
  - (c) Please explain how DSM costs are allocated as between commercial and industrial customers, given that they don't appear to be separately identified for DSM programming purposes.
  - (d) Please provide the 2010 estimate requested in question 1, and the historical information requested in question 2, for industrial customers specifically. Please break down this estimate by activity category (i.e. incentives, education, administrative, etc.).
4. *Reference: 2010 DSM Plan, p.12.* Union states: *As appropriate, Union may introduce new, positive TRC programs, drop planned programs or adjust the programs or incentive levels outlined in this section.* How and when would Ontario Energy Board approval for any such changes be sought?
5. *Reference: 2010 DSM Plan, p.18.* Under the "Strategy" heading for the *Commercial Existing Buildings* program segment, Union states that it has identified market segments

with like characteristics around which it will organize its Commercial Existing Buildings DSM offerings. Please identify these market segments.

6. *Reference: 2010 DSM Plan, pp. 20, 22, 23.*

(a) Union states (page 23, bottom): *There is an increased interest by customers for Union to take a larger role in communicating efficiency measures and opportunities.* Please indicate the basis for this conclusion, and elaborate on the communication role/activities referred to.

(b) The plan discusses the creation of education and communication vehicles and web-site refreshing to meet the distinct information needs of commercial, institutional and industrial customer groups. Please indicate how much money is budgeted to be spent on this education and communication activity in total for industrial customer groups (contract and non-contract) in 2010.

7. *Reference: 2010 DSM Plan, Appendix B, p.2.* Please provide the basis (other than reference to previous OEB decisions) for the 56% free rider assumption for industrial DSM initiatives.