

Aiken & Associates

578 McNaughton Ave. West
Chatham, Ontario, N7L 4J6

Phone: (519) 351-8624
Fax: (519) 351-4331
Cell: (519) 365-1078
E-mail: raiken@xcelco.on.ca

October 25, 2010

By Courier

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

Dear Ms. Walli,

**RE: EB-2010-0148 - Interrogatories of the London Property Management
Association Notice of Intervention**

Please find attached the interrogatories of the London Property Management Association
in the above noted application.

Sincerely,

Randy Aiken

Randy Aiken
Aiken & Associates

Encl.

cc: Chris Ripley, Union Gas Limited

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, pursuant to section 36(1) of the *Ontario Energy Board Act, 1998*, for an order or orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission and storage of gas as of January 1, 2011.

**INTERROGATORIES OF THE LONDON PROPERTY MANAGEMENT
ASSOCIATION (“LPMA”)**

Interrogatory # 1

Ref: Exhibit A, Tab 1, pages 4-5

Please confirm that as a result of the elimination of the Ontario Capital Tax effective July 1, 2010, that there will be no further impact after 2010 of the changes noted.

Interrogatory # 2

Ref: A, Tab 1, Page 10

- a) Please confirm that there were no costs related to assistance for customers, such as a Winter Warmth fund or similar funds, included in the approved revenue requirement in Union’s last cost of service proceeding. If this cannot be confirmed, please indicate the amount that was included.
- b) How have the Late Payment Penalty Litigation costs deferral account (179-113) been allocated between customer classes for 2011?
- c) The October 20, 2010 letter from the Board re LEAP Emergency Financial Assistance indicates at Attachment A that the Board has determined that the LEAP funding should be recovered from all rate classes, based on distribution revenue by rate class. If the response to part (b) is not consistent with this allocation of costs please provide a table that shows the current allocation of the late payment penalty litigation costs to the rate classes with an allocation that is based on distribution revenues.

d) If the response in (b) above is not consistent with the allocation in the October 20, 2010 letter, please explain if Union proposes to change the allocation of the late penalty litigation penalty costs to conform with the Board letter. If not, please explain why not.

Interrogatory # 3

Ref: Exhibit A, Tab 1, page 11

a) Will the amended low-income proposal include an incremental budget amount over and above the 2011 DSM budget of \$24.890 million noted on page 8 of Exhibit A, Tab 1? If yes, please provide an estimate of the incremental DSM budget related to changes to the DSM plan for low-income customers.

b) Will the incremental low-income customer DSM budget costs be allocated only to Rate 1 and Rate 01 customers? If not, please explain what rate classes the incremental costs will be allocated to.

Interrogatory # 4

Ref: Exhibit A, Tab 1, pages 12-13

a) Is the only change in the proposed Payments section related to the removal of Union's bank account number?

b) Is there any change related to payment date of the 20th day of each month? If yes, what impact would this change have on the working cash requirement?

Interrogatory # 5

Ref: Exhibit A, Tab 1, page 14

a) Is the deferral account requested by Union a continuation of a similar deferral account to record the input tax credits and debits associated with items not previously subject to PST but now subject to HST with no option or refund for the period July 1, 2010 to the end of 2010? If not, please explain why this deferral account is required for 2011.

b) How and where has Union recorded the ratepayer portion of the change related to the HST/PST for the period July 1, 2010 through December 31, 2010?

Interrogatory # 6

Ref: Draft Rate Order, Appendix E

Is Union proposing any changes in any of the charges shown in Appendix E of the draft rate order from the level currently in place? If yes, please identify and explain.

Interrogatory # 7

Ref: Draft Rate Order

At page 2 of the draft rate order it is indicated that the AU volume adjustment is based on the most recent three years' (i.e., 2006 to 2008) actual weather normalized volume loss. Please confirm whether the most recent three years used to calculate the AU adjustment is 2006 to 2008 or 2007 to 2009.

Interrogatory # 8

Ref: Ref: Exhibit A, Tab 1, page 11

Please provide updated tables for Tables 1 through 5 provided in the attachment to Exhibit B3.4 of EB-2009-0275 showing the addition 2009 data and the calculation of the adjustment factors used in the current application.

Interrogatory # 9

Ref: Working Papers, Schedule 15

Please provide the CCA calculations that give rise the CCA difference figures of (11,870) and (5,962) in columns (f) and (g) of line 1 in Schedule 15.