



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: piac@piac.ca. <http://www.piac.ca>

Michael Buonaguro
Counsel for VECC
(416) 767-1666

October 28, 2010

VIA MAIL and E-MAIL

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

Dear Ms. Walli:

Re: Vulnerable Energy Consumers Coalition (VECC)
Notice of Intervention: EB-2010-0148
Union Gas Limited – Application for Rates Effective January 1, 2011

Please find enclosed the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

Michael Buonaguro
Counsel for VECC
Encl.
cc: Chris Ripley

Union Gas Limited – 2011 Application for Rates effective January 1, 2011

EB-2010-0148

INTERROGATORIES OF THE VULNERABLE ENERGY CONSUMERS COALITION

Question #1

Reference: Exhibit A, Tab 1, pages 8-11

- a) Does Union believe that the recovery of costs related to LEAP costs by rate class should be on a different basis than the recovery of incremental DSM programs targeted to low-income customers? Please explain.

Question #2

Reference: Schedule 10 of EB-2009-0275 and
Schedule 10 of EB-2010-0148

- a) In setting rates for 2010, the average use adjustment for rate class M1 was a decline of 0.6%. In the current application, a 1.4% decline in average use is indicated. Does Union have any view as to why the AU, as measured by the average of the most recent three years of normalized usage, has declined at over twice the rate that it declined for 2010?
- b) Please provide Union's estimate of the 2010 year end balances by rate class in Account 179-118.

Question #3

Reference: Board Staff IR #3(a)

- a) In providing the response to the referenced IR in this proceeding, please show the breakdown by usage level (e.g., first 100 m³, next 150 m³, etc.) for each rate class.