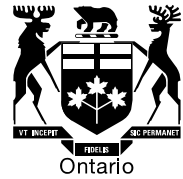


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BY EMAIL

March 16, 2011

Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Union Gas Limited
London Reinforcement Project
Board File Number EB-2010-0381 – Board Staff Interrogatories**

Further to the Board's Procedural Order No. 1, dated February 28, 2011, please find attached Board Staff interrogatories for the above mentioned proceeding.

Please forward the attached to Union Gas Limited and all intervenors in this proceeding.

Yours truly,

Original Signed By

Khalil Viraney
Case Manager

Enclosure

**Board Staff Interrogatories
Union Gas Limited ("Union")
Leave to Construct Application
EB-2010-0381
Dated: March 16, 2011**

1. Ref: Union Application – Project Summary, page 4 of 11

On page 4 of the project summary, Union has indicated that the proposed pipeline will travel southward on Wonderland Road North to tie into existing facilities at Fanshawe Park Road. Did Union consider other alternative routes to meet its expansion objectives? If "Yes", please provide details of the alternative routes considered.

2. Ref: Union Application – Project Summary, page 3 of 11

Union has provided a schedule showing the projected growth in customers from 2011 to 2017. Please answer the following questions with respect to Schedule 3.

- a) What areas does the forecast include (City of London, County of Middlesex)?
- b) Please provide the actual numbers corresponding to Schedule 3 for the years 2007 to 2010.

3. Ref: Environmental Report by Azimuth Environmental Consulting Inc.

On page 8 of the report, Section 3.4.2 indicates that consultation with the City of London on the alternatives resulted in staff identifying a concern with the addition of new gas pipelines in the Fanshawe Park/Wonderland Road area due to the amount of existing infrastructure present and the planned widening of Wonderland Road.

- a) When Union came to know of the issues (future road widening and amount of existing infrastructure) from the City, did it try to explore other alternatives routes? Please provide a detailed response.
- b) Please explain why Union decided to build the pipeline along the proposed route when it was known that the road will be widened in the near future?
- c) Is it possible for Union to move the proposed route further away from the road such that it would not significantly impact the future widening of the road? Please provide a detailed response.
- d) What is the status of discussion with the City regarding the timing and location of the proposed pipeline in relation to the planned road widening?

- e) What is Union's position in case it is unable to resolve the outstanding issues with the City of London and County of Middlesex and the parties oppose the construction of the pipeline along the proposed route?

4. Ref: Environmental Report by Azimuth Environmental Consulting Inc.

What will be the impact of the proposed pipeline on watermains, drains and sewers? How does Union propose to deal with any adverse impacts on the affected watermains, drains and sewers?