

EB-2011-0038

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 October 1, 2011.

**INTERROGATORIES OF THE CITY OF KITCHENER
FOR UNION GAS LIMITED**

Interrogatory # 1

Ref: Exhibit A, Tab 4, Attachment A, page 1-4

To what extent, if any, did Black & Veatch incorporate any of the concerns or comments of external stakeholders, such as Kitchener, on the subject matter of its storage accounting and cost allocation review in its draft or Final Reports and recommendations to Union? Please be as specific as possible.

Interrogatory # 2

Ref: Exhibit A, Tab 4, Attachment A, page 1-4
EB-2010-0039, Exhibit B6.08

Preamble: In EB-2010-0039 at Exhibit B6.08, Kitchener provided a summarized accounting template (attached for ease of reference) that would display and reconcile Union's regulated and unregulated storage revenues, costs and capacity to integrated storage operations. In its response to this interrogatory, Union indicated that the information needed to complete the template was not available.

a) Please confirm that Black & Veatch was provided a copy of Exhibit B6.08 from EB-2010-0039 at the project kickoff meeting attended by Union, Black & Veatch and external stakeholders, including Kitchener, in December 2010.

b) Based upon Black & Veatch's review, can the accounting template of Exhibit B6.08 be partially or fully populated with actual and / or forecast storage revenues, costs and capacity? If not, then why not?

Interrogatory # 3

Ref: Exhibit A, Tab 4, Attachment 1

What were the total fees and expenses charged by Black & Veatch to Union for its review?