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**By electronic filing**

August 8, 2011

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> floor  
Toronto, ON M4P 1E4

Dear Ms Walli,

**Union Gas Limited ("Union")**  
**Request for Approval to Amend C1 and M12 Rate Schedules**  
**Board File No.: EB-2011-0257**  
**Our File No.: 339583-000112**

Attached are Interrogatories on behalf of our client, Canadian Manufacturers & Exporters ("CME"), in the above-noted proceeding.

Under Procedural Order No. 1, the due date for these Interrogatories was Friday, August 5, 2011.

Both Mr. DeRose and I were out of the office on that date and we respectfully urge the Board to extend to today's date the deadline for submission of written interrogatories. In that connection, we note that Board Staff's Interrogatories in this proceeding were distributed earlier today.

Please contact me if there are any questions.

Yours very truly,

A handwritten signature in black ink, appearing to read "P. Thompson", with a long horizontal flourish extending to the right.

Peter C.P. Thompson, Q.C.

PCT\slc  
enclosure

c. Karen Hockin (Union)  
Emily Kirkpatrick (Torys)  
Intervenors EB-2011-0257  
Nancy Coulas

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**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, (Schedule B);

**AND IN THE MATTER OF** an Application by Union Gas Limited for an order or orders amending or varying its approved C1 and M12 rate schedules to accommodate new firm transportation services.

**INTERROGATORIES OF  
CANADIAN MANUFACTURERS & EXPORTERS (“CME”)  
TO UNION GAS LIMITED**

1. What are the annual year-by-year incremental revenues that the new service(s) to TransCanada PipeLines Limited (“TCPL”) will generate for the ten (10) year duration of each of the transportation contracts with service commencing November 1, 2012?
2. What are the year-by-year incremental costs that Union expects to incur to provide the new services to TCPL over the ten (10) year duration of each of the transportation contracts?
3. If the amount of the incremental revenues in any year to be provided in response to question 1 above is greater than the amount of the incremental costs in that year, then is it Union’s shareholder or its ratepayers that will benefit from the “sufficiency”? If ratepayers are the beneficiaries of the “sufficiency”, then how is it to be allocated?
4. Conversely, if the amount of the incremental costs in any year to be provided in response to question 2 above is greater than the amount of the incremental revenues in that year, then upon what rate classes will the net incremental cost burden fall?