

BARRISTERS & SOLICITORS

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December 2, 2011

BY COURIER (2 COPIES) AND EMAIL

Ms. Kirsten Walli Board Secretary Ontario Energy Board P.O. Box 2319 2300 Yonge Street, Suite 2700 Toronto, Ontario M4P 1E4 Fax: (416) 440-7656 Email: boardsec@oeb.gov.on.ca

Dear Ms. Walli:

Re: Pollution Probe – Interrogatories to Union Gas EB-2011-0327 – Union Gas – 2012-14 DSM Plan

Pursuant to *Procedural Order No. 2*, please find enclosed Pollution Probe's interrogatories to Union Gas for this matter.

Yours truly,

Basil Alexander

BA/ba

Encl.

cc: Applicant and Intervenors by email

EB-2011-0327

Pollution Probe Interrogatories for Union Gas

December 2, 2011

Issues 1.1-1.10: Are the 2012-14 budgets ... reasonable and appropriate?

1. Reference: Exhibit A, Pages 15-19, particularly Tables 1 and 3

Do the cumulative DSM budgets proposed by Union Gas for 2012-14 reflect the maximum amounts allowed under the DSM Guidelines? If not, please provide the differences between the maximum amounts and the proposed DSM budgets. Please note that it is understood that the proposed budget numbers are prior to the addition of allowed but currently unknown future inflation for 2013 and 2014.

Issue 1.11: Is the proposed allocation for DSM budget costs and incentive costs appropriate?

2. Reference: Exhibit A, Page 17

Union Gas is proposing to allocate its 2012 Low-income DSM budget of \$8.068 million to rate classes in proportion to the most recent Board-approved allocation of rate base.

Please provide the dollar cost to each rate class if the \$8.068 million Low-income DSM budget is allocated to rate classes in proportion to their respective shares of Union's in-franchise:

- a) rate base:
- b) delivery revenues; and
- c) number of customers.