

December 6, 2011

**VIA RESS AND COURIER**

Ms. Kirsten Walli  
**ONTARIO ENERGY BOARD**  
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File No. T988122

Dear Ms. Walli:

**Re: EB-2011-0327 – Union Gas Limited 2012-2014 Demand Side Management (DSM) Plan**

**Industrial Gas Users Association (IGUA) Late Interrogatories**

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Procedural Order No. 2 herein, issued November 18<sup>th</sup>, provides that interrogatories on Union's pre-filed evidence in this matter were due this past Friday, December 2<sup>nd</sup>. As a result of the writer's work demands (and through no fault of those at IGUA providing instructions on this matter), we were unable to submit interrogatories on Friday.

This letter is written:

- a. To request that the Board accept late interrogatories submitted on behalf of IGUA; and
- b. To request that Union endeavour to respond to these interrogatories prior to the Settlement Conference scheduled to commence on Monday, December 19<sup>th</sup>.

IGUA realizes that the current procedural schedule directs Union to file responses to interrogatories by Friday December 16<sup>th</sup>, followed the next business day by the settlement conference convening on Monday December 19<sup>th</sup>. Under this schedule, IGUA cannot suggest that Union be provided with extra time to respond to these late submitted interrogatories. IGUA appreciates that Union will prioritize responses to those interrogatories submitted on time, and requests reasonable efforts to, in addition, provide responses to those interrogatories set out below.

IGUA has taken the time to review the interrogatories submitted by other parties, and in the result has included below only those interrogatories related to facts not addressed in interrogatories already filed. (We have been able to decrease the number of interrogatories hereby submitted as a result.)

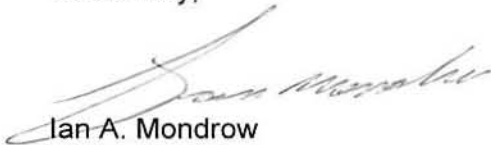
1. *Reference: Exhibit A, Page 13.*
  - a. Please indicate the number of customers consuming in excess of 25 million m<sup>3</sup> annually found in each of the M4, M5 and Rate 20 rate classes.
  - b. Please indicate the DSM budget spending anticipated, by rate class, for the customers identified in response to question 1.a.
2. *Reference: Exhibit A, Appendix A, page 45.* Please provide a breakdown of the number of customers of the following types in each of the Rate T1 and Rate 100 classes:
  - a. Large volume manufacturing
  - b. Power plants
  - c. Institutional clients – hospitals
  - d. Institutional clients – schools/universities
  - e. Institutional clients – other (and please specify type)
  - f. Greenhouse operations
  - g. Industrial process customers
3. *Reference: Exhibit A, Appendix A, page 51.* Please provide a table that allocates the proposed 2012 customer program budget to each of the Rate T1 and Rate 100 customer classes, and within each of these classes among the categories of customers listed in question 2.
4. *Reference: Exhibit A, Appendix A, pages 45-57 and pages 95-107.*
  - a. Are large industrial customers (those consuming in excess of 25 million m<sup>3</sup> annually) expected to participate in the Integrated Energy Management Systems Program?
  - b. If the answer to question 4.a. is yes, please detail the differences between the Large Industrial Resource Acquisition Program and the Integrated Energy Management Systems Program, including the differences in the program activities to be engaged in.
  - c. At page 107, the second last bullet indicates that “*in the targeted customer group, there are a limited number of plants with sufficient complexity and energy*

*intensity to see value in the expenditure on an IEMS". Please indicate how many such plants there are, and in which rate classes.*

5. *Reference: Exhibit A, Appendix A, page 56. Please explain what is meant in the 4<sup>th</sup> footnote to table 19 by "R100/20" and "R100/25".*
6. *Reference: Exhibit A, Tab 1, Appendix G.*
  - a. Please file copies of all survey responses received.
  - b. Please break out the statistical representations provided at figures 1, 2, 3 and 4 to disaggregate the customer types listed in question 2.

On behalf of IGUA, we request the Board's indulgence, and Union's best efforts.

Yours truly,



Ian A. Mondrow

- c: Murray Newton (IGUA)  
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Intervenors of Record

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