



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: piac@piac.ca. <http://www.piac.ca>

Michael Janigan
Counsel for VECC
(613) 562-4002 ext. 26

May 25, 2012

VIA MAIL and E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

Re: Vulnerable Energy Consumers Coalition (VECC)
UNION GAS EB-2012-0087

Please find enclosed the interrogatories of VECC in the above-noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC
Encl.

INTERROGATORIES OF THE VULNERABLE ENERGY CONSUMERS COALITION

UNION GAS EB-2012-0087

2011 EARNINGS SHARING AND DISPOSITION OF DEFERRAL ACCOUNTS AND OTHER BALANCES

Interrogatory #1

Account 179-70, Short-Term Storage and Other Balancing Services

Reference: Exhibit A, Tab1, page 7 and, page 8, Figure 2

- a) Please explain what the data source is for the “Market Price” shown.
- b) Please explain briefly what the “Market Price” data shown actually means.
- c) Please explain why there are any sales below the “Market Price,” for example the sales at August 13, 2011 in the figure.
- d) The data show only nine dates on which short-term firm peak storage sales were made in 2011. Is this a typical level of activity on an annual basis?
- e) Please provide any additional non-confidential information available with regard to the sales made on each date as shown in Figure 2, i.e., type of transaction, space, deliverability, unit price, whether counterparty was affiliated or a competitor, etc.
- f) In general, to what does Union attribute its general ability to usually sell the subject services at or above the “Market Price”?
- g) Does Union agree that as market values of firm peak storage services decrease, there is no necessary reasons why the number of storage sales should decrease?

Interrogatory #2

Earnings Sharing Calculation

Reference: Exhibit A, Tab 2, page 3 and Appendix B, Schedule 1

- a) Please show how the 8.10% benchmark ROE was calculated.
- b) Please provide the actual normalized ROE for 2011.
- c) Please provide the X-factor that would have been required to set normalized actual 2011 ROE equal to 8.10%.