

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*;

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, 2012.

**INTERROGATORIES TO UNION GAS LIMITED (Union)
from
INDUSTRIAL GAS USERS ASSOCIATION (IGUA)**

1. **Reference: Exhibit A, Tab 1.** Please file a table with the following columns, with one row for each of Union's rate classes, using the 2011 methodology for allocation of SSM:
 - a. 2011 DSM Budget \$000
 - b. 2011 DSM Actual \$000
 - c. Variance 2011 DSM Actual minus 2011 DSM Budget \$000
 - d. % Change: $100 \times [2011 \text{ DSM Actual divided by } 2011 \text{ DSM Budget}]$
 - e. Proposed 2011 Low Income DSM Program \$000
 - f. Proposed 2011 SSM \$000
 - g. Proposed 2011 Market Transformation Incentive \$000
 - h. Proposed 2011 Low Income Incentive \$000
 - i. Proposed 2011 LRAM \$000
 - j. Subtotal \$000
 - k. Deferrals from 2010 \$000
 - l. Total \$000
 - m. % Change: $100 \times [\text{Total } \$000 \text{ divided by } 2011 \text{ DSM Budget } \$000]$

2. **Reference: Exhibit A, Tab 1.** Please file a table that is the same as that requested in IGUA Interrogatory #1, but allocating SSM, Market Transformation and Low Income incentives using the 2012 methodology for allocation of SSM.
3. **Reference: Exhibit A, Tab 1.** Please file a table that contains the same information as the table requested in IGUA interrogatory #1, but calculated in cents per cubic meter using actual 2011 volumes rather than in total dollars. Please add two columns at the beginning of this table headed “*2011 delivery rate (¢/m3)*” and “*2012 delivery rate (¢/m3)*”, respectively.
4. **Reference: Exhibit A, Tab 1.** Please file a table that contains the same information as that requested in IGUA Interrogatory #2, but calculated in cents per cubic meter using actual 2011 volumes rather than in total dollars. Please add two columns at the beginning of this table headed “*2011 delivery rate (¢/m3)*” and “*2012 delivery rate (¢/m3)*”, respectively.
5. **Reference: Exhibit A, Tab 1, page 14.** While not proposing in this application to dispose of costs associated with implementation of GDAR amendments, Union has provided information on its expected costs for such implementation. Union explains these costs as including capital costs to modify Union’s customer information system so that it has the functionality required to implement Union’s updated policies and practices.
 - a. Please explain precisely what new customer service information system functionality and associated modifications are anticipated to be required.
 - b. Please indicate which rate classes these expenditures would be allocated to.
6. **Reference: Exhibit A, Tab 2, Appendix B, Schedule 1.** Please confirm Union’s net utility earnings, both in dollars and in percentage, after earnings sharing as proposed.

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