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By electronic filing

December 20, 2012

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

Dear Ms Walli,

Union Gas Limited ("Union")
2013-2014 Demand Side Management ("DSM") Plan
Board File No.: EB-2012-0337
Our File No.: 339583-000145

We enclose Interrogatories submitted on behalf of Canadian Manufacturers & Exporters ("CME") for The Association of Power Producers of Ontario ("APPrO").

Yours very truly,

A handwritten signature in blue ink, appearing to read 'VJA', with a long, sweeping horizontal line extending to the right.

Vincent J. DeRose

\slc
enclosure

c. David Butters (APPrO)
Marian Redford (Union)
Interested Parties EB-2012-0337
Paul Clipsham (CME)

OTT01: 5431050: v1

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 pursuant to Section 36(1) of the *Ontario Energy Board Act, 1998*, for an Order or Orders approving the 2013-2014 Large Volume Demand Side Management Plan.

**INTERROGATORIES OF
CANADIAN MANUFACTURERS & EXPORTERS ("CME")
TO THE ASSOCIATION OF POWER PRODUCERS OF ONTARIO ("APPrO"),
Evidence prepared by Todd Williams,
Managing Director, Navigant Consulting Ltd. ("Navigant")**

Reference: Exhibit B, DSM Funding Options for Large Natural Gas Customers

1. Navigant has presented a jurisdictional review of the "Opt-out" programs across North America. CME wishes to better understand how "Opt-out" programs in the different jurisdictions affect the overall DSM budget allocated to the ratepayers that do not "Opt-out". To this end, please answer the following questions:
 - (a) In those jurisdictions that have implemented "Opt-out" programs, when customers "Opt-out" of the DSM program, and are thereby no longer allocated DSM costs in their rates, is there a corresponding decrease of the overall DSM budget? If not, do the customers that do not "Opt-out" pay more for DSM?
 - (b) In order to clarify (a) above, please address the following scenario. If the rate class is allocated a DSM budget of \$1M, and there are ten (10) customers in that rates class, each of whom are allocated \$100,000, and nine (9) of the 10 customers "Opt-out", how much would the one (1) remaining customer pay for DSM? Specifically, would the remaining customer who did not exercise their "Opt-out" option be allocated \$100,000 or \$1M?