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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 Green Energy Coalition ("GEC").

Yours very truly,

A handwritten signature in blue ink, appearing to read 'VJ DeRose', with a long horizontal flourish extending to the right.

Vincent J. DeRose

\slc
enclosure

c. David Poch (GEC)
Chris Neme (Energy Futures Group)
Marian Redford (Union)
Interested Parties EB-2012-0337
Paul Clipsham (CME)

OTT01: 5430121: 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 GREEN ENERGY COALITION (“GEC”),
Evidence prepared by Chris Neme**

Reference: Exhibit C, Page 3, Footnote 3

1. At Footnote 3, the article by Anna Chittum entitled “Follow the Leaders: Improving Large Customer Self-Direct Programs” is cited. Please produce a copy of that article.

Reference: Exhibit C, Pages 11-14

2. In this section, Mr. Neme proposes a “Multi-Year Plan” instead of the “One-Year Plan” proposed by Union Gas Limited (“Union”).

Mr. Neme illustrates his multi-year proposal with a hypothetical example under which a customer has an annual direct access DSM budget of \$50,000. Under the proposed multi-year plan, such a customer could access \$100,000 over 2-years, instead of spending \$50,000 in each year. CME would like to better understand how such a multi-year direct access budget would be funded by ratepayers. To this end:

- (a) Under the hypothetical example, where the single-year direct access budget for the customer is \$50,000, and the 2-year direct access budget is \$100,000, could that customer access the entire \$100,000 in the first year? Alternatively, could that customer access the entire \$100,000 in the second year?
- (b) If customers are entitled to access the full 2-year budget in the first year, how would that amount be funded in rates? Specifically, would the full 2-year budget of \$100,000 be recoverable from customers in the first year, or alternatively, would \$50,000 be recoverable from ratepayers in each of the 2-years, even though Union is being called upon to pay the full amount in year 1?
- (c) If only \$50,000 is annually recoverable in rates for each of the 2-years, but customers may access the full \$100,000 in year 1, how would Union fund those DSM budgets?