

December 20, 2012

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

Dear Ms. Walli:

**RE: EB-2012-0337 – Union Gas Limited – 2013-2014 Demand Side Management Plan
for Large Volume Customers – Interrogatories to the Association of Power
Producers of Ontario (“APPrO”)**

Please find attached Union Gas Limited’s interrogatories on APPrO’s evidence filed
December 14, 2012.

If you have any questions, please contact me at 519-436-4521.

Yours truly,

[Original signed by]

Marian Redford
Manager, Regulatory Initiatives

cc: Alexander Smith (Torys)
EB-2012-0337 Intervenors

UNION GAS LIMITED
INTERROGATORIES ON APPRO WRITTEN EVIDENCE

1. Reference: Section 3, Appendix A and B - Survey Sent to APPRO Members

Questions:

- (a) Please provide a list of all APPRO members that were sent a copy of the survey attached to the Navigant report titled *DSM Funding Options for Large Natural Gas Customers* (the "Navigant Report"). On the list please indicate each of the following: the name of the APPRO member, the plant name, the natural gas rate class effective January 1, 2013 and whether the APPRO member responded to the survey.
- (b) Please provide copies of the surveys completed by APPRO members and referenced in the Navigant Report. Please identify on each survey the natural gas rate class effective January 1, 2013 of the respondent.
- (c) Please provide copies of all correspondence between APPRO or Navigant and APPRO's members related to the survey.
- (d) Please define the scope of the energy management program referenced in evidence at table 4.

2. Reference: Page 16, Table 3 - Spending on energy management for the past 3 years

Question:

- (a) For each year 2009 through 2011 provide the amount of cumulative natural gas savings for each project and the incentives received.

3. DSM Initiatives & Power Generation

Preamble: Navigant states at page 2 of the Navigant Report that most utility DSM initiatives are not designed to address the technologies and processes used in power generation.

Questions:

- (a) Which of the DSM program elements set out in the table at Appendix A, Tab 1, Appendix B, page 8 of Union's application do not address the technologies and processes used in power generation?

- (b) Why do the elements identified in question 3(a) not apply to power generators in Ontario?

4. *Reference: Section 2 - Jurisdictional Review*

Questions:

- (a) Please list all of the 21 utility companies referenced at page 3 of the Navigant Report that do offer DSM programs and indicate for each of them:
 - (i) the jurisdiction in which they operate;
 - (ii) whether they are for natural gas, electric utilities or a combination of both;
 - (iii) whether opt-out provisions are offered, on what basis and what obligations are placed on the customer; and
 - (iv) whether self-direct provisions are offered, on what basis and what obligations are placed on the customer.
- (b) Please confirm that all electricity generators pay for electricity conservation demand charges through the global adjustment.
- (c) Please provide the Minnesota Public Utilities Commission's decision referenced on page 5 of the Navigant Report.
- (d) Please confirm the reference to the Nova Scotia Utility and Review Board's review of Nova Scotia Power Inc.'s application of a DSM rider request on page 7 of the Navigant Report does not relate to opt-out provisions.