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September 11, 2013

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Ottawa

SENT BY ELECTRONIC MAIL (BoardSec@ontarioenergyboard.ca)

Calgary

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor, P.O. Box 2319
Toronto, ON M4P 1E4

New York

Dear Ms. Walli:

Natural Resource Gas Limited
Interrogatory Responses per Board Decision of August 29, 2013
OEB File No. EB-2012-0406/EB-2013-0081

Further to the Board's Decision dated August 29, 2013 on the motion brought by Integrated Grain Processors Co-operative Inc. ("IGPC"), please see the responses to IGPC Information Requests Nos. 10(d), 11(d), 13(e) and 16(e). We are close to finalizing the remainder, which required gathering historical information. We expect to be able to provide these remaining responses tomorrow, or Friday at the latest. This should still allow for sufficient time for parties to proceed next Wednesday.

Yours very truly,



Richard J. King
RK:hi

Enclosure

c: All Parties to EB-2012-0406/EB-2013-0081
T. Graat and L. O'Meara (NRG)
L. Thacker (Co-counsel to NRG)

INTERROGATORY #10

Issue 2.2

Contingency costs

Preamble:

IGPC is seeking to understand the basis upon which NRG feels it is entitled to recover \$142,000 in contingency.

Reference:

NRG Evidence, June 3, 2013 – Contingency Costs \$132,000, p. 8 of 22

Question:

(d) What proportion of the \$132,000 in monies not spent was closed to NRG's rate base?

RESPONSE:

At this point in time, there are no unspent monies that were closed to rate base. As noted in NRG's initial response, all of these expenses have now been incurred and NRG believes appropriate documentation was provided with our answer.

INTERROGATORY #11

Issue 2.3

NRG staff costs

Preamble:

IGPC wishes to understand Mr. Graat's role as compared with the role of Mr. Bristoll. "Mr. Graat was instrumental in negotiations with contractors that led to the project being completed on time"

Reference:

NRG Evidence, June 3, 2013, para. 31, pp. 6/7 of 22

Question:

(d) Please provide details of Mr. Graat's salary or remuneration as a NRG employee or consultant to NRG at relevant times. Please provide details of Mr. Graat's remuneration in the years 2002 through 2007.

RESPONSE:

Mr. Graat has received no salary or remuneration as a NRG employee or consultant during the years 2002 through 2007. During this period, the utility has had the benefit of many hours of Mr. Graat's time – at no cost.

INTERROGATORY #13

Issue 2.4

Interest during construction

Preamble:

IGPC wishes to understand the interest during construction (“IDC”) costs claimed to be incurred by NRG in respect of the construction of the IGPC Pipeline.

Reference:

Evidence of NRG, June 3, 2013, p. 8 of 22 – Interest During Construction \$113,272, and Exhibit “I” IGPC Project Interest Summary

Question:

(e) Please confirm there was no interest charged in respect of the purchase of the steel pipe for IGPC Pipeline.

RESPONSE:

NRG confirms that there was no interest charged in respect of the purchase of the steel pipe for IGPC Pipeline.

INTERROGATORY #16

Issue 4

Preamble:

IGPC wishes to understand NRG's position regarding the costs and the calculation of the aid-to-construct or contribution in aid of construction.

Reference:

IGPC Pre-filed Evidence, Exhibit C, Tab 1

Question:

(e) Is the aid to construct calculation based upon the spreadsheet filed by NRG in EB-2006-0244? If not, why not and please provide a live Excel version of such spreadsheet. Explain in detail any differences in the spreadsheet, including formulas and inputs.

RESPONSE:

Please see the attached live Excel version of the aid to construct spreadsheet.