

VIA E-MAIL, RESS & COURIER TO THE BOARD

February 18, 2014

Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto ON M4P 1E4

Attn: Kirsten Walli, Board Secretary

RE: EB-2013-0365 UNION 2014 RATES
REQUEST FOR SUPPLEMENTARY RESPONSE

In this proceeding, the Ontario Greenhouse Vegetable Growers ("OGVG") have made inquiry into the M5 rate and aspects of the Leamington Expansion Pipeline Project approved by the Ontario Energy Board in EB-2012-0431. These inquiries have been generated due to members concerns regarding their rates, contracting practices for the expansion and inconsistent information received about the project. In reviewing the responses to our interrogatories, it is clear that discovery has been inhibited by responses that do not fully address the questions asked. Without a technical conference prior to the Settlement Conference, we respectfully request enhanced responses to the following questions to increase our understanding and enhance the effectiveness of settlement discussions.

Exhibit B12.2

In our question sub e), we asked that Union show the calculations that reconcile the significant increase in rate base allocated and revenue requirement to the M5 rate class and resulting rates. Union's answer refers to analysis provided OGVG in October 2013. While some of that analysis formed part of Union's response to this IR, we still have not seen the calculations.

- i) Please file the remaining components of the October analysis not filed in this proceeding.
- ii) By way of numeric calculation and supporting description, please show how the component factors (e.g., 44% design day demand) contribute to the 58% increase in Union South Distribution Net Plant and other factors contribute to a 90% increase Total Revenue Requirement.
- iii) Please explain the source of the 232% increase in Cost of Gas and the drivers that calculate that increase.

Exhibit B12.5

Please confirm that Union did not include any customer growth in the residential, commercial or industrial rate classes beyond the load growth attributed to greenhouse customers identified in Attachment 1.

Exhibit B12.6

a) Please describe how recent improvements in energy efficiency for new or expanded facilities were incorporated into the analysis.

Exhibit B12.8

The interrogatory was seeking understanding of the system design and underlying Union assumptions regarding customer demand on the system and criteria used in designing the project. The response misconstrued the area of inquiry as related to economics of the project. Therefore please provide answers to the original questions:

Please provide the incremental total hourly demand, for each firm and interruptible increases, for each year of the first five years of the project.

- a) How were those hourly demands generated (i.e., by historical hourly demand by acre, historical annual demand by acre converted to hourly)?

Exhibit B12.9

Similar to Exhibit B12.8, inquiries in B12.9 were focused on understanding system design criteria. Further since Exhibit B12.8 did not answer the system design criteria questions, the references in responses to d) and e) are not responsive to our inquiry. Therefore please provide answers to the following questions:

b) Please provide the pressure design conditions that were used to size the pipe. Specifically, what is the minimum inlet pressure at the Comber Transmission Station and the minimum inlet pressure at the County Road 14 Gate Station¹ used to determine the pipe size and resulting capacity.

c) Please provide the specific criteria related to capacities. Is the 48.633 m³/hr the total peak day capacity under design conditions. Under what conditions is the additional interruptible service available?

¹ EB-2012-0431 Leave to Construct Application, Schedule 4

d) Please provide the hourly load growth forecasted by year for the next five years for the Leamington system served by this pipeline.

e) Based upon the hourly loads for the forecasted attachments and additional hourly loads identified in d), please specify the remaining capacity available for additional potential customers in year 6 and beyond.

Respectfully Submitted on Behalf of OGVG,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. C. Ripley - Union Gas
Interested Parties EB-2013-0365
Dr. J. Taylor - OGVG
M. Buonaguro