

Board Staff Interrogatories for Union Gas Limited

1. References: Union Gas Limited Intervenor Evidence, Exhibit A, Tab 1, Page 1 lines 3-7

Preamble:

In its evidence Union stated its position that Greenfield's acquisition of gas supply service from the Vector Pipeline would be "...a bypass of Union's distribution system that would constitute special treatment of Greenfield South relative to other gas users in Union's franchised service area, contrary to public interest."

Questions:

- a) Please file copies of Union's Certificate of Public Convenience and Necessity and Franchise Agreement covering Union's service area where the proposed Greenfield's generating plant and a gas supply pipeline connected to Vector tap would be located.
 - b) Please comment on any clauses in the Certificate of Public Convenience and Necessity and in the Franchise Agreement that would preclude a customer acquiring gas supply service from a company other than Union within Union's service area or from getting Board's approval of a limited area Certificate of Public Convenience and Necessity within Union's franchised service area.
2. References: Union Gas Limited Intervenor Evidence, Exhibit A, Tab 1, Page1 lines 20-22 and page 24 lines 24-26

Preamble:

Union, in its analysis of potential negative impacts of Greenfield being supplied by Vector in the case that the Board approves Greenfields application, estimates that "...the potential annual margin loss to Union and its ratepayers with respect to its existing customers at \$26 million." According to Union's evidence this estimate is based on forecast 2014 volumes and revenues.

Questions:

- a) Please provide the detailed calculations and underlying assumptions used to calculate the estimated \$26 million annual margin loss.
- b) What would be the annual estimated impact of this potential loss on the rates of an average residential customer in each of Union's rate zones?

3. References: Union Gas Limited Intervenor Evidence, Exhibit A, Tab 1, Page 23 lines 20-23

Preamble:

Regarding Union's expectation to provide service to all incremental loads within the area of its Certificate and franchised service area, Union maintains that it is in the public interest to provide regulated utilities "...exclusive right to deliver natural gas to end-users within defined franchised service areas, unless there are exceptional circumstances."

Questions:

Please set out and discuss some of the exceptional circumstances that would, in Union's view, justify in light of public interest, that an incremental load is served by a pipeline constructed and operated by a company other than regulated utility holding a franchise agreement in the area.