



## Jay Shepherd

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**BY EMAIL and RESS**

November 28, 2014  
Our File: EB20140261

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario  
M4P 1E4

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2014-0261 – Dawn-Parkway Expansion – SEC Interrogatories**

We are counsel to the School Energy Coalition (“SEC”). Enclosed, please find interrogatories on behalf of SEC.

Yours very truly,  
**Jay Shepherd P.C.**

*Original signed by*

Mark Rubenstein

cc: Wayne McNally, SEC (by email)  
Applicant and intervenors (by email)

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act 1998*, Schedule B, and in particular, S. 36 thereof;

**AND IN THE MATTER OF** the *Ontario Energy Board Act 1998*, Schedule B, and in particular, section 90(1) thereof;

**AND IN THE MATTER OF** the *Ontario Energy Board Act 1998*, Schedule B, and in particular, section 91 thereof;

**AND IN THE MATTER OF** the *Ontario Energy Board Act 1998*, Schedule B, and in particular, section thereof;

**AND IN THE MATTER OF** an Application by Union Gas Limited for an Order or Orders for approval of recovery of the cost consequences of all facilities associated with the development of the proposed Lobo C Compressor/Hamilton-Milton Pipeline project;

**AND IN THE MATTER OF** an Application by Union Gas Limited for an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in the City of Hamilton, City of Burlington, and the Town of Milton, and leave to construct a compressor and ancillary facilities in the Municipality of Middlesex Centre.

**INTERROGATORIES ON BEHALF**

**OF THE**

**SCHOOL ENERGY COALITION**

**SEC-1**

[A-3-p.2] *"The Kings North Connection Pipeline Project, Brantford to Kirkwall Pipeline and TransCanada's 2016 expansion facilities will require approval of the Settlement Agreement by the National Energy Board ("NEB") in RH-001-2014."*

Please provide details of the TransCanada 2016 expansion facilities. Are these facilities TransCanada's Energy East Mainline Project?

**SEC-2**

[A-6/7] TransCanada's Energy East application before the National Energy Board includes a proposal to convert certain natural gas pipeline assets in the Eastern Ontario Triangle to oil, and to replace that capacity with a new pipeline (Energy East Mainline Project). Please discuss Union's view on any potential impacts that such a proposal may have on demand for the capacity on the Dawn to Parkway system in short, medium, and long term.

**SEC-3**

[A-7-p.23-24] Please provide copies (or relevant excerpts) of the references contained in footnotes 13-15.

**SEC-4**

[A-8-Schedules 1-2] Please explain how the the impact of DSM been incorporated into forecasting design day demand requirements.

**SEC-5**

[A-11] Does Union expect the cost of the proposed Lobo C compressor to be different than the cost of the Parkway C and D compressors as forecasted in EB-2012-0433/EB-2013-0074? If so, please explain.

**SEC-6**

[A-11] Please provide a comparison of forecasted costs for the Parkway West Project (EB-2012-0433) and the Brantford-Kirkwall/Parkway D Project (EB-2012-0074), and any updated forecasted costs. Please explain how any changes in forecasted costs of those projects, have been considered, if at all, in determining the forecasted costs for the proposed project.

Submitted by the School Energy Coalition on this 28<sup>th</sup> day of November, 2014.

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy Coalition