



***PUBLIC INTEREST ADVOCACY CENTRE  
LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC***

**ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7**

Tel: (613) 562-4002 ext. 26. Fax: (613) 562-0007. e-mail: [mjanigan@piac.ca](mailto:mjanigan@piac.ca) <http://www.piac.ca>

Michael Janigan  
Counsel for VECC

November 28, 2014

**VIA E-MAIL**

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

Dear Ms. Walli:

**Re: EB-2014-0261 Union Gas Limited 2016  
Dawn Parkway Expansion Project  
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed the Interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant as well as all intervenors via email.

Yours truly,

Michael Janigan  
Counsel for VECC

cc: Union Gas - Karen Hockin - [khockin@uniongas.com](mailto:khockin@uniongas.com)  
All Intervenors

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**INTERROGATORIES OF THE  
VULNERABLE ENERGY CONSUMERS COALITION (“VECC”)**

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**VECC IR#1**

**Reference:** Exhibit A, Tab 3, page 2

**Preamble:** The referenced page states:

*“The expansion of pipeline facilities within Ontario remains critical for Ontario remains critical for Ontario, Quebec and U.S. Northeast consumers to access ...the diversity and security of new, cost competitive supply from the nearby Marcellus and Utica shale formations.”*

- a) Does the business case for any of the approvals sought in the subject application depend critically on the assumption that production from the Marcellus and Utica shale formations will not decline materially from current estimates of future production from these formations for any reason? Please explain.

**VECC IR#2**

**Reference:** Exhibit A, Tab 3, pages 7-8

- a) Do the forecasted bill impacts for sales service customers in Union’s South and North service areas resulting from the projects significantly depend on any assumptions with respect to future production forecasted from the Marcellus and Utica shale formations?

**VECC IR#3**

**Reference:** Exhibit A, General

- a) Can Union confirm that the projects’ economics are independent of the price of oil, currently and over the life of the projects?
- b) Are there any plausible scenarios under which one or more of the subject projects might not ultimately be completed and put into service but for which Union would incur significant costs to be recovered from ratepayers?

**\*\*\*End of Document\*\*\***