REF: EX. A, Tab 5, Schedule 2

Preamble: We would like to get a better understanding of the impact of deferral accounts on the contract rate classes M4 and M5

- 1) Please provide the annual bill for the following customers using current rates:
 - a) without the applied for DSM deferral account impact
 - i) Contract demand: 11,000 m3/day Annual Volume: 2,500,000 m3 (1) as an M4 customer (2) as an M5 customer ii) Contract demand: 30,000 m3/day Annual Volume: 5,600,000 m3 (1) as an M4 customer (2) as an M5 customer b) with the applied for DSM deferral account impact i) Contract demand: 11,000 m3/day Annual Volume: 2,500,000 m3 (1) as an M4 customer (2) as an M5 customer ii) Contract demand: 30,000 m3/day Annual Volume: 5,600,000 m3 (1) as an M4 customer
 - (2) as an M5 customer
 - c) For each of the respective scenarios, please provide the percentage annual bill impact associated with the applied for DSM account disposition (for the above inquiry, tabular format would be appreciated).
 - d) Please provide Union's views on options to mitigate these bill impacts for the contract rate classes including the potential to minimize rate class DSM variances (e.g., such as ring-fencing provided to M7/T1 customers in EB-2011-0327).

REF: EX. A, Tab 5, Schedule 2

2) Please explain why the 2012 LRAM deferrals are the subject of this proceeding and not a previous proceeding?