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March 11, 2015

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli,

RE: EB-2014-0182 - Interrogatories of London Property Management Association

Please find attached the interrogatories of the London Property Management Association in the above noted application.

Sincerely,

Randy Aiken

Randy Aiken
Aiken & Associates

Encl.

cc: Vanessa Innis, Union Gas Limited (e-mail)

ONTARIO ENERGY BOARD

IN THE MATTER OF The Ontario Energy Board Act, 1998,
S.O. 1998, c.15, Schedule B, and in particular, S.90.(1) thereof;

AND IN THE MATTER OF The Ontario Energy Board Act, 1998,
S.O. 1998, c.15, Schedule B, and in particular, S.36 thereof;

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 Town of Milton and the Town of Oakville;

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 Burlington Oakville Project.

**INTERROGATORIES
OF
LONDON PROPERTY MANAGEMENT ASSOCIATION**

Interrogatory #1

Ref: Exhibit A, Tab 3, page 2

- a) Is the cost of transportation services to supply the Burlington Oakville system today recovered through distribution rates or through the gas supply charge?**
- b) If the response to part (a) is through the gas supply charge, does this mean that only system gas customers are paying for these transportation services to the Burlington Oakville system?**
- c) Please confirm that if the proposed pipeline system is approved, the associated costs would be recovered from all distribution customers in Union South.**
- d) Does Union have any other similar situations in which the cost of transportation services to supply a specific area are recovered through the gas supply charge? If yes, please provide details.**

Interrogatory #2

Ref: Exhibit A, Tab 3, page 4

- a) Please show how the calculation of the net annual savings to ratepayers of \$6.5 million noted on lines 12 and 13 has been calculated.**
- b) Please show the net annual savings broken down into Union South, Union North and ex-franchise rate classes, similar to the revenue requirement of \$8.5 million associated with the project.**

Interrogatory #3

Ref: Exhibit A, Tab 4, page 6

- a) Has Union had any discussions with TransCanada as to whether or not they could increase the capacity on the Domestic line? If not, why not. If yes, please provide a summary of the discussions.**
- b) Has Union had any discussions with Enbridge Gas Distribution about the possibility of Enbridge seeking a delivery point off of the proposed pipeline?**

Interrogatory #4

Ref: Exhibit A, Tab 5, page 1

What is the basis for the statement that Union does not expect that the secondary market capacity held by Union will be available after October 31, 2016.

Interrogatory #5

Ref: Exhibit A, Tab 6, page 5

- a) Please explain why the design day demand includes interruptible contract demand served from the Burlington Oakville system.**
- b) Please provide the design day demand for each of the last three years and the forecast for each of the next three years, broken down into the three categories noted: general service demand, firm contract demand and interruptible contract demand.**

Interrogatory #6

Ref: Exhibit A, Tab 6, page 8

Please explain how continued natural gas usage efficiency affects the forecast of attachments (lines 14-16).

Interrogatory #7

Ref: Exhibit A, Tab 6

- a) Please confirm that the forecast growth shown in Table 1 is the sum of the total column shown in Exhibit A, Tab 6, Schedule 3.**
- b) Please show how the figures in Exhibit A, Tab 6, Schedule 3 are calculated based on the customer growth figures shown in Exhibit A, Tab 6, Schedule 4.**

Interrogatory #8

Ref: Exhibit A, Tab 7, page 8

- a) What is the incremental capacity provided by the proposed NPS 20 pipeline?**
- b) What is the incremental capacity provided by the NPS 16 pipeline?**

Interrogatory #9

Ref: Exhibit A, Tab 7, Figure 7-1

- a) Did Union consider any other routes other than the proposed route and the Trafalgar Road route? For example, did Union consider a route that followed the existing NPS 8 line from the Milton Gate Station to the Third Line & NPS Station, or a route that went from the Dawn/Parkway System to the Burlington Gate Station?**
- b) If not, why not? If yes, please explain fully why these routes were rejected.**

Interrogatory #10

Ref: Exhibit A, Tab 8

Please provide the gas transportation costs paid to TransCanada and third party suppliers for each of the last two years where the transportation was used to meet the peak day requirements of the Burlington Oakville system.

Interrogatory #11

Ref: Exhibit A, Tab 9, Schedule 3 & 4

Schedule 3 shows that the income tax rate used is 26.5%. However footnote 5 on Schedule 4 shows a tax rate of 25.5%. Please reconcile.

Interrogatory #12

Ref: Exhibit A, Tab 9, Schedules 6 & 8

- a) Please explain why Schedule 6 does not show a reduction to supply charges for the M1 rate class whereas Schedule 8 does.**
- b) Please provide a version of Schedule 8 that shows the impact on a system gas customer and a direct purchase customer of an average sized M2 customer and a small M4 customer.**