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Reply To: Thomas Brett
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Our File No. 147936

VIA RESS, EMAIL AND COURIER

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

Attention: Kirsten Walli
Board Secretary

Dear Ms. Walli:

Re: EB-2014-0182 - Interrogatories of BOMA

Please find attached Interrogatories of BOMA with respect to the above noted proceeding.

Yours truly,

FOGLER, RUBINOFF LLP

Thomas Brett
TB/dd
Encls.

cc: All Parties (*by email*)

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

**BUILDING OWNERS AND MANAGERS ASSOCIATION,
GREATER TORONTO (BOMA)**

Interrogatory No. 1

Ref: Exhibit A, Tab 3, Page 1

- (a) The evidence shows that approximately 45% of design day demand in Oakville and Burlington is currently provided by TCPL's Domestic Line under (direct) contracts between Union and TCPL. With respect to each of those contracts, please provide:
 - (i) the contract demand and annual volumes;
 - (ii) the identification number;
 - (iii) the expiry date, and whether the contract is renewable; and
 - (iv) the delivery point (to Union).

Interrogatory No. 2

Ref: Exhibit A, Tab 3, Page 4

- (a) Please provide the calculation which supports the assertions made in the sentence beginning at line 9, including the ranges shown for avoided transportation costs (\$11.4 million to \$37.3 million) and in annual ratepayer savings (\$2.9 million and \$28 million).

Interrogatory No. 3

Ref: Exhibit A, Tab 4, Page 1

- (a) What are the boundaries of Union's Hamilton Halton District? Please provide a map, with the municipal boundaries superimposed. Please show the parts of Burlington, Oakville, Milton, and any other communities served and separately, to be served, by Union's Burlington-Oakville system. Please show all the pipeline systems in the area on the map, including those of Union, TCPL and EGD, all pipeline gate stations, and the boundaries of the three new TCPL delivery areas.

Interrogatory No. 4

Ref: Exhibit A, Tab 4, Page 9

- (a) Please provide a map showing the boundaries of Union Parkway Belt, the newly created Union ECDA, and the amended Union CDA, which also shows each TCPL delivery point for each of these three areas. What is Union's understanding of the reasons TCPL created three delivery areas from the previous Union CDA?
- (b) Why was it necessary for Union to bid for 135 TJ/d in TCPL open season to meet design day requirements at Kirkwall/Dawn and Hamilton Gate #3 Station? How are those design day requirements currently being met?

- (c) What is the effective date (i.e. when will service commence) of the new TCPL transportation contract? Please explain fully.
- (d) Has Union amended its firm service contracts to the new ECDA or its contracts to the amended Union CDA? Please provide the documentation which changed delivery point.
- (e) What was the date of the open season? Please provide documentation used by TCPL. Was Union successful in obtaining the sought after capacity?

Interrogatory No. 5

Ref: Exhibit A, Tab 5 (General)

- (a) Can Union provide, for each year from 2011 to 2015, inclusive, and forecast for 2016, the transportation portfolio which provides service for each TCPL delivery point from which gas is drawn, on peak design day, by the Union CDA, and from the date TCPL's amendment to its delivery area was approved by the NEB, by each of the three new areas. How would that portfolio change once the proposed Burlington line begins service?
- (b) Please show tolls for TCPL service (FT, renewable) for delivery from Parkway to each of the "old CDA", and since TCPL's decision to reorganize its delivery areas, the amended CDA, the ECDA, the Dawn Parkway Belt. Provide the current tolls, and any known (forecast) future tolls to each delivery area.

Interrogatory No. 6

Ref: Exhibit A, Tab 6, Page 3

- (a) For each year from 2011 to the present, please provide the volumes that Union supplies TCPL at Parkway for redelivery to Union at Bronte and Burlington Gas Stations.
- (b) What volume would be supplied if and when the proposed new NPS 20 line is built?

Interrogatory No. 7

Ref: Exhibit A, Tab 6, Page 12

- (a) Please provide the details supporting the conclusion stated at line 10, et seq.