



## Jay Shepherd

Professional Corporation  
2300 Yonge Street  
Suite 806, Box 2305  
Toronto, ON M4P 1E4

**BY EMAIL and RESS**

March 12, 2015  
Our File: EB20140182

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

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2014-0182 – Burlington Oakville Pipeline Project – 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, section 90(1) thereof;

**AND IN THE MATTER OF** the *Ontario Energy Board Act 1998*,  
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 ON BEHALF  
OF THE  
SCHOOL ENERGY COALITION**

**SEC-1**

[A-3,p. 4] Please provide a detailed breakdown of the forecasted \$6.5M net annual savings calculation.

**SEC-2**

[A-6] Please provide the basis, including all assumptions made, for the forecasted:

- a) growth of 7TJ/d by 2016/2717. (p.6)
- b) average annual design day growth of the Burlington Oakville System of 4 TJ/d from 2016 to 2030, and 2.8 TJ/d from 2031 to 2035. (p.11 at footnote 10, Schedule 3)
- c) impact of DSM for in-franchise customers embedded in the design day requirements.(p.6)

**SEC-3**

[A-7, p.5] Please explain why Union used the design day delivery requirement in 2035, as opposed to another year, for the purpose of comparing physical or commercial alternatives. Please explain how the calculations would be different for 2020, 2025, and 2030.

**SEC-4**

[A-7] Please provide details of discussions, if any, that Union has had with TransCanada regarding potential non-facilities alternatives to the proposed project.

**SEC-5**

[A-9] Please revise Schedules 5 and 9 to show the impact of both the Burlington to Oakville Project and the recently approved EB-2014-0261 project.

Submitted by the School Energy Coalition on this 12<sup>th</sup> day of March, 2015.

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy Coalition