

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B;

**AND IN THE MATTER OF** an application by Union Gas Limited for an Order granting leave to construct a natural gas pipeline and ancillary facilities in the Township of St. Clair, in the County of Lambton.

**INTERROGATORIES TO UNION GAS**

**From**

**INDUSTRIAL GAS USERS ASSOCIATION (IGUA)**

1. **Reference:** Prefiled Evidence, page 4.

The table at the top of page 4 does not contain any units labels.

- (a) Please file a copy of the table indicating what the numbers represent (i.e. providing the units represented).
- (b) If the table at the top of page 4 is not a table of volumes, please file a similarly structured table showing the growth in volumes over the period indicated in the existing table, including a "Percent Growth" column.

2. **Reference:** Prefiled Evidence, page 4.

The evidence indicates that a fall of 2014 review of industrial customer consumption on the Sudbury system indicated that the system is operating below the minimum design specifications.

- (a) Please indicate the number of customer service interruptions/curtailments (voluntary or otherwise) experienced on the Sudbury line during each of the last 5 winters (not including customer driven outages).

- (b) Please provide the design day and average day demands in aggregate on the Sudbury system during each of the last 5 winters, and Union's forecast of these parameters for the next 5 winters.
- (c) Please provide the aggregate daily contract demand (CD), firm hourly quantity (FHQ) and maximum hourly quantity (MHQ) for the contract customers served by the Sudbury system for each of the last 5 winters, and Union's forecast of these parameters for the next 5 winters.
- (d) Please provide the total current installed capacity available to serve customers of the Sudbury system.

3. **Reference:** Prefiled Evidence, page 5.

The evidence describes the configuration of the Sudbury system, and its evolution.

Please indicate the date of the last expansion of the system, and the incremental capacity resulting from that expansion.

4. **Reference:** Prefiled Evidence, page 6, paragraph 27.

The evidence indicates that the expansion for which approval is being sought will *"provide capacity for future growth to meet the needs of Union's current industrial customers"*.

- (a) Please describe the process through which Union has assessed the future growth of Union's current industrial customers.
- (b) Please indicate how much future growth (i.e. how much demand capacity) is provided for by the current project, in aggregate.
- (c) Please confirm that all anticipated future growth in the demands of Union's current industrial customers of which Union is aware, including all requests made of Union for future capacity the precise volume of which is still being determined, has been provided for in the current expansion proposal. If this is not the case, please quantify approximately how much anticipated future growth has not been provided for and explain why.
- (d) Please indicate when it is anticipated that the Sudbury system will next be operating *"below the minimum design day specifications"* according to Union's forecasts, after completion of the expansion which is the subject of this application.

5. **Reference:** Prefiled Evidence, page 7, paragraphs 29-30; page 8, paragraph 32.

Please provide the calculations to illustrate the allocation of capitals costs as between the FNX Victoria mine on the one hand, and system reinforcement and general service growth on the other hand.

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