

**Ontario Energy Savings L.P. Interrogatories**  
**Union Gas Limited IVA Fee Application**  
**EB-2007-0599**

1. Please set out in detail how Union concluded that 29% of IVA transactions would generate inbound call centre activity?
2. What is the projected distribution of IVA by rate class?
3. What portion of the projected 29% IVA transaction calls does Union believe will be related to customers inquiring about IVA transaction that represent a credit to their account?
4. Please set out in detail, how Union determined that each IVA specific call will cost Union \$6.20 to complete?
5. Please substantiate how Union determined that an IVA transaction, whether for a credit (reimbursement) or debit (charge amount) will generate a cost of \$6.20?
  - a. Would Union not immediately direct customers calling with respect to IVA questions to the applicable marketers' call centre?
  - b. Will the IVA line on the bill indicate any questions associated with this charge should be directed to your natural gas supplier at the contact number below?
6. What portion of the 29% projected IVA calls does Union estimate will generate a general inquiry call?
7. What portion of customers does Union estimate will dispute IVA charges?
  - a. What portion of customers does Union estimate will dispute IVA credit charges?
8. What portion of customers does Union estimate will not dispute IVA charges?
  - a. What portion of customers does Union estimate will not dispute IVA credit charges?
9. Union projects that there will be a cost of \$0.05 to list each IVA transaction on a customer's bill. Please provide the cost drivers for this charge?
10. What is Union's projected Bad Debt expense associated with IVA?
11. Why has Union not proposed an IVA transaction fee similar or the same as Enbridge Gas Distribution Inc.?

- a. Does Union feel it is important to propose an IVA transaction fee that is standardized with the IVA transaction charge of other distributors? Please explain your answer.
12. Does Union anticipate a decrease in call volume for the ABC service once the IVA charge is implemented? Please explain.
13. Is it Union's intent to have the initial IVA fee in place for the interim period of June 1, 2007 through December 31, 2007? If not, please explain the time period that Union proposes for the initial IVA fee.
  - a. Once Union has had some experience with the IVA charge, does it plan to share that information with interested parties?
  - b. Once Union has had some experience, does it intend on convening a meeting with the GDAR Working Group to discuss the findings to date with respect to the IVA charge?
14. What portion of the ABC fee is attributed to call centre charges?
  - a. Please provide a breakdown of the ABC charge.
15. What number of IVA transactions does Union anticipate processing for the term June 1, 2007 through December 31, 2007?
16. The Union GDAR Service Agreement states:

Union will use pre-emptive soft thresholds for price point creation, price change, and invoice vendor adjustment requests to avoid accidental and potentially severe negative impacts to consumers. Predefined thresholds will be set for each category of pricing and adjustments. If a request to exceed one of these thresholds is received, Union will hold the request and make an effort to confirm the validity of the request with the Gas Vendor. After 7 calendar days, if Union has been unable to confirm the request, or it has been mutually agreed that the request is in error, it will be automatically rejected. If the request is validated with the Gas Vendor, it will be accepted and processed.

Thresholds will be reviewed by Union on an annual basis, or more frequently as conditions require. Any changes to the thresholds will be communicated outside of the EBT system. Notice of changes will be made thirty days in advance in a method consistent with section 7.7 of this Agreement. Current and proposed Threshold values will also be made available on Union's web site.

Union will levy a fee for each use of the invoice vendor adjustment. Notice of changes to the fee will be made thirty days in advance in a matter consistent with section 7.7 of this Agreement. Current and proposed IVA fees will also be made available on Union's web site. IVA fees shall not include any early termination fees from the Gas Vendor.

## Section 7.7 Notices

Any demand, notice or other communication (“Notice”) to be given in connection with this Agreement shall be given in writing and shall be sufficiently given if:

- (a) delivered personally;
- (b) sent by registered mail;
- (c) sent by facsimile;
- (d) delivered by courier;
- (e) delivered by other means of electronic communication,

to the contact person set out at Appendix A to this Agreement or to such other person at such other address as the Party to whom such Notice is to be given shall have advised the Party giving the same in the manner provided in this section. Any Notice delivered personally shall be deemed to have been given and received on the day it is so delivered at such address, provided that if such day is not a business day such Notice shall be deemed to have been given and received on the next following business day. Any Notice sent by registered mail shall, if mailed to and from an address in Ontario, be deemed to have been given and received on the fourth business day following the date of mailing or, if mailed to or from an address outside of Ontario, shall be deemed to have been given and received on the tenth business day following the date of mailing. Any Notice transmitted by facsimile or other electronic communication shall be deemed given and received on the day of its transmission provided that such day is a business day and such transmission is completed before 5:00 p.m. on such day, failing which such Notice shall be deemed given and received on the first business day after its transmission.

Please explain this statement, is it Union’s belief that the IVA charge/IVA threshold can be changed at any time during the term with only the 30 days notice mentioned above.

- a. Please explain what Union means by: current and proposed IVA fees will be made available on Union’s web site.
- b. Does Union contemplate changing the IVA fee during the approved term? If yes, will Union seek the Board’s approval for the IVA rate change under section 37 of *the Act*?