

**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 or orders clearing certain non-  
commodity related deferral accounts and sharing utility  
earnings pursuant to a Board-approved earnings sharing  
mechanism.

**INTERROGATORIES OF THE**  
**LONDON PROPERTY MANAGEMENT ASSOCIATION**

**Interrogatory #1**

Ref: Exhibit A, Tab 1, Updated, page 6

Please provide a table that shows the number of direct purchase customers and volumes that make up the 1.761 PJ shortfall in direct purchase deliveries at the end of March by rate class.

**Interrogatory #2**

Ref: Exhibit A, Tab 1, Table 4

Please show the calculation of the current tax line in Table 4 for 2014, including but not limited to the capital cost allowance deduction.

**Interrogatory #3**

Ref: Exhibit A, Tab 1, Table 5

Please confirm that 2014 is the last year for which there will be a recovery for IFRS transition costs. If not confirmed, when will this recovery end?

**Interrogatory #4**

Ref: Exhibit A, Tab 1, page 31

Please explain why there is no balance in account no. 179-135 (UFG volume) for 2014. Was the difference between the actual UFG costs and those built into rates within the \$5 million deadband? If so, please show the calculation of the difference and show the volumes and prices used.

**Interrogatory #5**

Ref: Exhibit A, Tab 1, Schedule 3

Please show the figures and calculations used to calculate the costs for OM&A, UFG and compressor fuel for both the Board approved 2013 and actual 2014 columns.

**Interrogatory #6**

Ref: Exhibit A, Tab 2

Is the calculation of utility earnings and earnings sharing consistent with the methodology used to calculate the earnings sharing in previous years. If not, please explain any differences.

**Interrogatory #7**

Ref: Exhibit A, Tab 2, Appendix B, Schedule 1

- a) What is Union's normalized actual return on equity for 2014?
- b) At what level would the X factor have had to been in 2014 to result in a normalized return on equity equal to the benchmark ROE of 8.93%?

**Interrogatory #8**

Ref: Exhibit A, Tab 2, Appendix D, Schedule 1

- a) Union gas failed to meet the yearly performance level of 75% for the Call Answering Service Level (G.2.1.9.A.1). Please explain why Union failed to meet the yearly performance target.
- b) What has Union done to ensure it meets this yearly target (G.2.1.9.A.1) in 2015 and subsequent years?
- c) Please explain the high level of meters with no reads for 4 consecutive months or more for March and April (G.2.1.9.C.1).

**Interrogatory #9**

Ref: Exhibit A, Tab 3, page 5

Why is Union proposing to allocate the balances in Account 179-112 based on the Board-approved average number of customers in Rate 01 and Rate M1 in approved 2013 rates rather than based on the actual average number of customers in these two rate classes in 2014?

**Interrogatory #10**

Ref: Exhibit A, Tab 3, Schedule 1, Updated

Please add descriptions to the rows shown at the bottom of the table on page 1 where there are none.