

July 9, 2015

BY COURIER & RESS

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
Suite 2700, 2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

**RE: EB-2014-0182 – Union Gas Limited (“Union”) – Burlington Oakville Project –  
Interrogatories on Intervenor Evidence**

Dear Ms. Walli,

Please find attached Interrogatories on behalf of Union Gas Limited on the evidence prepared by Ms. Aggie Cheung submitted on behalf of the Ontario Greenhouse Vegetable Growers (“OGVG”) and Canadian Manufacturers and Exporters (“CME”).

If you have any questions with respect to this submission please contact me at 519-436-5334.

Yours truly,

*[original signed by]*

Vanessa Innis  
Manager, Regulatory Initiatives

Encl.

cc: Zora Crnojacki, Board Staff  
Mark Kitchen, Union Gas  
Charles Keizer, Torys  
All Intervenors (EB-2014-0182)

**UNION GAS LIMITED**  
**INTERROGATORIES ON EVIDENCE PREPARED BY AGGIE CHEUNG SUBMITTED ON BEHALF OF**  
**ONTARIO GREENHOUSE VEGETABLE GROWERS ("OGVG") AND CANADIAN MANUFACTURERS**  
**& EXPORTERS ("CME")**

1. *Reference:* page 3, paragraph 8

*Preamble:* Ms. Cheung provides a summary of her understanding of the current arrangements to serve the Burlington Oakville System.

*Question:*

- a) Please provide a reference for the assumption of a 60 TJ/d exchange with Enbridge.

2. *Reference:* 1) pages 4-5, paragraph 15; 2) EB-2014-0182 June 19, 2015 Letter - Responses to CME and OGVG Questions

*Preamble:*

In reference 1), Ms. Cheung states:

*“If Union purchases the incremental gas supply at Niagara instead of Dawn and transports it through the TransCanada system to the Burlington Oakville area, Union's Dawn to Parkway system does not need to be expanded. The expansion of the Dawn to Parkway system can be further reduced if Union purchases gas supply to serve both the incremental demand and the existing demand.”*

In reference 2), the response to question 1a) states, “No further capacity is available on this path from TransCanada using the Domestic Line without facility expansion.”

*Question:*

- a) Please confirm that there is no available Domestic Line capacity between Burlington Gate Station and Parkway after TransCanada's Greater Golden Horseshoe Project has been completed.
- b) Please confirm that the Settlement Agreement between the Eastern LDCs and TransCanada recognizes that TransCanada will utilize Kirkwall to Parkway transportation on the Dawn Parkway System to provide further transportation capacity between Niagara and delivery points downstream of Kirkwall (including the Union ECDA).
- c) Please confirm that the path from Niagara to Union ECDA using the Dawn Parkway System is Niagara to Kirkwall plus Kirkwall to Parkway plus Parkway to Union ECDA.

3. *Reference:* page 5, paragraph 16

*Preamble:* Ms. Cheung states Union could increase the supply from Niagara to meet its aggregate demand for Union South.

*Question:*

- a) Please provide an assessment of the market at Niagara since 2012, including number of average daily reported trades and average daily quantity of reported trades.
- b) Please provide an explanation of how excess supply to the Burlington Oakville System would be dealt with on non-design days, including a discussion of any assets required to manage the excess supply

4. *Reference:* Attachment 9

*Preamble:* Union seeks to understand the analysis performed by Ms. Cheung in Attachment 9.

*Question:*

- a) Please provide the analyses in Excel format, with all calculations intact.
- b) Please provide references and/or calculations for all assumptions used in the revenue requirement forecast.

5. *Reference:* Attachment 9

*Preamble:* Union seeks to understand the analysis performed by Ms. Cheung in Attachment 9 assuming that in the future TransCanada requires Union to contract for transportation capacity from Kirkwall to meet in-franchise demand at the Nanticoke (Kirkwall/Dominion) and Hamilton Gate #3 Stations (135 TJ/d).

*Question:*

- a) Please recalculate the cost comparisons in Attachment 9 assuming the contract for 135 TJ/d from Kirkwall to the Union CDA is required in all cases, including in the columns labeled 'Alternative'.

6. *Reference:* 1) Attachment 9; 2) Exhibit A, Tab 7, page 4

*Preamble:* In reference 2), Union's evidence outlines the existing capacity/contracts and additional design day requirement.

*Question:*

- a) Please confirm that supply currently originating at Dawn and being transported to the Burlington Oakville System (whether on Union's pipelines or on the TransCanada system) would not attract the marginal transportation rate (versus the current transportation rate).
- b) Please recalculate the cost comparisons in Attachment 9 to reflect the actual Dawn to Parkway quantity that would attract the marginal transportation rate (versus the current transportation rate) in the columns labeled 'Proposed using Incremental Capacity Rate'.