



Jay Shepherd

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BY EMAIL and RESS

August 17, 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 Union's Reply Evidence 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-6

[Ex.C, p.8] Union states the “Burlington Oakville System customers would be completely reliant upon supply delivered to TransCanada at Niagara where: there are fewer upstream pipeline connections; supply is primarily from one production basin; fewer counterparties transact; and there is no direct access to storage.”

- a. Please provide a list of all current and planned pipeline connections to Niagara. Please also provide their capacity and supply sources.
- b. What methods of in-direct access to storage can parties obtain who contract at Niagara?

SEC-7

[Ex.C, p.17-18] Union states that the Alternative Proposal would move up to 77% of Union’s upstream transportation and supply portfolio away from Dawn.

- a. If the proposed facilities are approved, what percentage of Union’s forecasted upstream transportation and supply portfolio would not be connected to Dawn in 2016 and 2035?
- b. In the Alternative Proposal, what percentage of Union’s forecast upstream transportation and supply portfolio would not be connected to Dawn in 2016, and 2035?

SEC-8

[Ex.C, p.21] What is the basis for Union's belief that TransCanada will require it at some future date to contract transportation capacity from Kirkwall to facilitate delivers to the Kirkwall/Dominion Gate Station and Hamilton #3 Gate Station?

SEC-9

[EB-2015-0166, Ex.A, p.40, Figure 5-5] Please confirm the landed cost of gas to Kirkwall from Niagara is more cost effective than any other source of gas into Union's system.

Submitted by the School Energy Coalition on this 17th day of August, 2015.

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition