



## Jay Shepherd

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**BY EMAIL and RESS**

September 8, 2015  
Our File: EB20150200

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario  
M4P 1E4

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2015-0200 – Union 2017 Dawn-Parkway Expansion – SEC Interrogatories**

We are counsel to the School Energy Coalition (“SEC”). Enclosed, please find interrogatories on behalf of the 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*,  
S.O. 1998, c. 15, Sched. B, as amended;

**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 2017 Dawn Parkway Project specifically the installation of the Dawn H, Lobo D and Bright C Compressors located in the Township of Dawn-Euphemia, the Municipality of Middlesex Centre and the Township of Blandford-Blenheim.

**INTERROGATORIES**

**ON BEHALF OF THE**

**SCHOOL ENERGY COALITION**

**SEC-1**

[A] Please provide copies of all materials that were provided to Union's senior management team, and if applicable, its parent company's Board of Directors, for the approval to undertake either collectively or individually, any aspects of the capital projects that underlie this application.

**SEC-2**

[A-6, p.17] Please provide a list of all Dawn-Parkway transportation contracts. For each contract please provide: the type of contract, capacity, commencement and expiry date, name of the contract holder, and receipt and delivery points.

**SEC-3**

[A-7, p.3] Please provide any internal asset condition or similar condition analysis regarding Plant B.

**SEC-4**

[A-8, p.4] Please provide at what amount incremental capacity, is each the proposed new compressors required.

**SEC-5**

[A-9-Sch 1-3] With respect to the capital costs for the proposed compressors:

- a. Please explain step-by-step how Union forecasted the cost of each proposed compressor.

- b. Please explain the difference in cost for each compressor.

**SEC-6**

[A-4-Sch 3, p.1-2, A-9] SEC seeks to understand Union's history of forecasting compressor capital costs. Please complete the attached excel spreadsheet.

**SEC-7**

[A-10-Sch 3] Please provide a bill impact table for consumption of 40,000m<sup>3</sup> per year.

**SEC-8**

[A-10-Sch 3] Please provide a similar bill impact table as requested in SEC-7 that includes an impact of all approved or applied for capital projects, including but not limited to, EB-2014-0182, EB-2014-0261, EB-2013-0074).

**SEC-9**

[A-6, p.21] Union's evidence states: "Union's five-year Term Up Provision is consistent with TransCanada's recently approved Term Up Provision (RH-001-2014). Short haul shippers contracted on the Dawn Parkway System and the TransCanada Mainline would have the ability to match contract terms on each pipeline and manage contracting risk."

- a. Please confirm that TransCanada's approved Term-Up provision is five-year for firm transportation shippers desiring to retain renewal rights if \$20 million or more of new facilities are required.
- b. Please confirm that the revised proposed provisions as set out in Union's Letter to the Board dated September 3 2015, which raised the threshold cost from \$20.0 million to \$50.0 million, is now not consistent with TransCanada's approved Term-Up provision.
- c. If (a) and (b) are confirmed, please explain why the change in threshold cost is appropriate.

Respectfully submitted on behalf of the School Energy Coalition this 8<sup>th</sup> day of September, 2015.

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy  
Coalition