



## Jay Shepherd

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**BY EMAIL and RESS**

October 13, 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 Dawn Ref Price / North T Service – 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)

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**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, pursuant to section 36(1) of the *Ontario Energy Board Act, 1998*, for an order or orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission and storage of gas as of January 1, 2016.

**INTERROGATORIES**

**ON BEHALF OF THE**

**SCHOOL ENERGY COALITION**

**SEC-1**

[A-1-p.20-22] Please expand Table 1 (DCQ Allocation) to show the allocations for the next 5 years.

**SEC-2**

[A-2] On what basis does Union's IRM Framework permit it to adjust its approved cost allocation methodology, as proposed in this application, before its 2019 rebasing application?

**SEC-3**

[A-2, p.3] Please provide a copy of the referenced 2016-2018 gas supply plan.

**SEC-4**

[A-3, p.1-2] Does the recent August 2015 settlement agreement between Union, Enbridge, Gaz Metro and TransCanada, affect Union's view on the potential changes in the secondary market due to the Energy East project? If so, please explain.

**SEC-5**

[A-3, p.2, Appendix A] Please provide any presentations, meeting notes, agenda, and any other documents that were provided to customers during the discussions regarding the service design and customer needs.

**SEC-6**

[A-3, p.8] Please confirm that there are no circumstances where non-North T-Service customers will be allocated amounts that accumulate in the proposed Base Service North T-Service TransCanada Capacity Deferral Account. If this is not correct, please explain.

Respectfully submitted on behalf of the School Energy Coalition this 13<sup>h</sup> October, 2015.

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy  
Coalition