

UNION GAS LIMITED

Application for approval to increase the operating pressures in certain of its natural gas storage pools.

EB-2015-0250

BOARD STAFF INTERROGATORIES

Interrogatory 1

Ref: Evidence, pages 1-2, paragraphs 3, 4, 5, 9

Preamble:

Union filed an application for the OEB to vary certain conditions related to maximum operating pressure of three pools: Bentpath East Pool (EB-2009-0144), Booth Creek Pool (EBO 207) and Mandaumin Pool (RP-1999-0047). The conditions of approval of Booth Creek Pool and Mandaumin Pool state that a leave of the OEB is required for Union to increase the maximum operating pressure of the pools and that Union shall file with the OEB engineering, geological and economic studies in support of any leave application. The condition of approval for Bentpath East Pool requires Union to file engineering and geological studies but not an economic study.

Union's evidence includes engineering and geological studies for all three pools but no economic studies.

Questions:

- a) Please explain the rationale for not including the economic information, as required by the original conditions of approval for Booth Creek Pool and Mandaumin Pool.
- b) For each of the three pools, please provide itemized and total estimated construction and operational costs for increasing the operating pressure.
- c) How will these costs be tracked and recovered by Union?

Interrogatory 2

Ref: Evidence, pages 2-3, paragraph 9

Preamble:

Engineering and geological studies are completed by Geofirma Engineering. Union stated that it provided these studies to the Ministry of Natural Resources and Forestry (MNRF) for review.

Questions:

- a) Regarding the engineering and geological studies filed with the MNRF please describe the process and status of MNRF's review.
- b) Please file any documentation issued by the MNRF confirming that the studies have been completed to the satisfaction of the MNRF and in compliance to the CSA 341.1-14 requirements.