



Northern Cross Energy Limited
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November 17, 2015

DELIVERED BY E-MAIL

Ms. Kristen Walli, Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2701
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Union Gas Community Expansion Project
OEB File No.; EB-2015-0179
Interrogatories of Northern Cross Energy Limited**

Further To Procedural Order No. 1, attached please find the interrogatories from Northern Cross Energy Limited in connection with the above matter.

On behalf of Northern Cross Energy Limited,

River Bend Consulting

A handwritten signature in blue ink that reads "David A. McLean". The signature is fluid and cursive, with a long horizontal stroke at the end.

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UNION GAS LIMITED
COMMUNITY EXPANSION PROJECT
EB-2015-0179

INTERROGATORIES submitted by: Northern Cross Energy Limited

RE: Future Community Expansion Projects

Reference: Exhibit A, Tab 1, Appendix D

1. If local natural gas storage is available to any of the projects that Union has referenced, would Union consider utilizing that storage to minimize its upstream system reinforcement costs if the overall capital cost of the project was less?

2. If not, why not?