

AND IN THE MATTER OF Application under the Ontario Energy Board's own motion to consider potential alternative approaches to recover costs of expanding natural gas service to communities that are not currently served.

INTERROGETORIES

**OF THE NORTHWESTERN ONTARIO ASSOCIATED CHAMBER OF COMMERCE,
THE NORTHWESTERN ONTARIO MUNICIPAL ASSOCIATION AND COMMON
VOICE NORTHWEST (THE "NOACC COALITION")**

April 8, 2016

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1 **PART A - UNION GAS INTERROGATORIES**

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3 The NOACC Coalition set out in its evidence, at page 3 lines 9 to 19, examples of
4 costing provided by Union Gas with respect to expansion of natural gas service to
5 the Municipalities of Neebing and Red Rock. In addition, Union Gas, in its table of
6 Opportunity Assessment Summary at Appendix “D” to its July 23, 2015 submission
7 in EB-2015-0179 sets out information of expanding natural gas to various
8 communities, chosen by Union Gas.

- 9
10 1. Please provide the information set out in Appendix “D” to Union’s July 23, 2015
11 submission in EB-2015-0179 with respect to communities in Northwestern Ontario
12 from Kenora (in the west) to Wawa (in the east), including without limitation
13 communities in Northwestern Ontario as set out in Tab 1 of the NOACC Coalition’s
14 Evidence (collectively hereinafter “Northwestern Ontario Communities”), but
15 specifically excluding those communities already set out in Appendix “D” to Union’s
16 July 23, 2015 submission in EB-2015-0179.
17
18 2. Has Union Gas completed similar estimates and costing (as set out in NOACC’s
19 Evidence at page 3 lines 9 to 19 and Tabs referenced therein) for any other
20 Northwestern Ontario Communities in last 10 years? If so, please produce.
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22 3. Please provide all correspondence to and from the communities listed in the
23 response of the Union Gas to No. 2 above in relation to the expansion of natural
24 gas service to those communities;
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26 4. With respect to each community listed in Union Gas’ response to No. 2 and with
27 respect to Northwestern Ontario Communities:
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29 a. advise whether natural gas services have been provided, or is in the process
30 of being provided (and at what stage);
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2 b. provide a list of those communities which have agreed to provide the
3 Contribution in Aid of Construction and those who have not;
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5 5. Enbridge, in their Evidence dated March 21, 2016 as Table 2, 3, and 4, provide lists
6 of “communities currently under considerations” with corresponding data which
7 includes data not set out in Appendix “D” to Union’s July 23, 2015 submission in EB-
8 2015-017, including without limitation, potential and forecast customers (conversion,
9 new, total) and proposed solution (collectively the “Additional Data”). Please provide
10 the Additional Data for those communities set out in Appendix “D” to Union’s July
11 23, 2015 submission in EB-2015-017 and for Northwestern Ontario Communities.
12

13 **PART B - EPCOR, ENBRIDGE GAS DISTRIBUTION AND UNION GAS (EACH THE**
14 **“UTILITY”)**
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16 1. If a fund is created to support the expansion of natural gas service to those rural
17 and remote communities who do not have such service, please provide your
18 position with respect to:
19

20 a. whether:

21 i. such a fund should be contributed to by all ratepayers in Ontario and
22 used to expand service to communities irrespective of Utility; or
23

24 ii. whether separate funds should be created for each Utility, limiting
25 contribution to each such fund to customers of each Utility with said
26 funds being used to expand natural gas service to only customers or
27 perspective customer of such Utility.
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30

1 b. how the Utility would prioritize the use of said fund for the expansion of
2 specific projects;

3
4 c. whether the Utility would be amenable to the incorporation, even partially, of
5 a non-economic test (e.g. needs based) to prioritize the use of said fund for
6 the expansion of specific projects;

7
8 2. At Page 19 of 38, 4(f) of its evidence, Union Gas submits that an assessment of the
9 “impacts of not proceeding with the project should not be required”. Does the Utility
10 agree with the above referenced submission of Union Gas? If so, would the Utility
11 then agree that circumstances such as the current energy supply mix (e.g.
12 electricity, diesel) and specific energy needs of the communities are not relevant
13 criteria? If the Utility does not agree with the above noted submission, why not?

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