

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B, and in particular, s. 90 thereof;

AND IN THE MATTER OF an application by Union Gas Limited for an Order granting leave to construct a natural gas pipeline and ancillary facilities in the City of Greater Sudbury.

INTERROGATORIES TO UNION GAS LIMITED (Union)

From

INDUSTRIAL GAS USERS ASSOCIATION (IGUA)

1. **Reference:** Not applicable.

IGUA intervened in EB-2015-0120, being Union's application for leave to construct three natural gas pipelines to serve a mine site and the City of Greater Sudbury. In that intervention IGUA expressed its Sudbury area members' concerns regarding the sufficiency and reliability of Union's distribution capacity in the area. We are aware of another application by Union for facilities in the Sudbury area – EB-2015-0042 – which was disposed of without a hearing. A search of the OEB's RESS for all filings by Union did not, as at May 9, 2016, show the foregoing applications. In the interests of ensuring that we are able to consider Union's recent overall work program on the Sudbury system:

- (a) Please provide the OEB docket numbers of all of Union's applications for leave to construct facilities in or around the City of Greater Sudbury in 2015 and 2016.
- (b) Please provide a map of the Sudbury system showing the proposed construction locations of all facilities subject to the applications listed in 1(a), and indicate the application related to each particular segment.
- (c) Please indicate the incremental capacity relating to the expansion provided for in EB-2015-0042 as well as from any other expansion which occurred in 2015 and 2016, apart from the one contemplated in EB-2015-0120.

2. **Reference:** Page 6 of 101 of the Application and Prefiled Evidence (at paragraphs 1 and 4).

The evidence indicates that Union seeks to upsize two sections of the existing Sudbury Lateral NPS 10 Line to NPS 12 hydrocarbon pipeline to address, *inter alia*, “some” additional capacity for future growth requirements.

- (a) Please explain how upsizing two segments of an NPS 10 line with NPS 12 pipeline will improve the capacity of the Sudbury Lateral Line.
- (b) Please indicate how much future growth (i.e. how much demand capacity) is provided for by the current project, in aggregate.
- (c) If upsizing two segments of an NPS 10 line with NPS 12 pipeline will not improve the overall capacity of the Sudbury Lateral Line, please advise whether it will be necessary to upsize all of the Sudbury Lateral Line to NPS 12 pipeline to accomplish an improvement in the overall capacity of this line.
- (d) Please explain what other steps Union intends to take regarding the future growth requirements which the facilities which are the subject of this application will not, in and of themselves, address.
- (e) Please confirm that all anticipated future growth in the demands of Union’s current industrial customers of which Union is aware, including all requests made of Union for future capacity, the precise volume of which is still being determined, has been provided for in the current expansion proposal. If this is not the case, please quantify approximately how much anticipated future growth has not been provided for and why.
- (f) Please indicate when Union anticipates that the Sudbury system will next be operating below the minimum design day specifications according to Union’s forecasts, after completion of the upsizing contemplated by this application.

3. **Reference:** Page 7 of 101 of the Application and Prefiled Evidence (at paragraph 8).

The evidence indicates that Union proposes undertaking the Project during the 2016 summer construction season. In Union’s application bearing OEB docket number EB-2015-0120, Union sought and received, by letter from Ms. Pascale Duguay on November 25, 2015, approval from the OEB to defer construction of the proposed Victoria Mine pipeline until 2016.

- (a) Please explain whether and how the deferral of the construction contemplated in EB-2015-0120 will impact the timeline Union proposes in the present application.

4. **Reference:** Union Responses to IGUA Interrogatories in EB-2015-0120, filed on 2015-05-27, IGUA 1, Page 1 of 7.

(a) Please provide an updated copy of the table provided showing the residential and small commercial volume per year for the Greater Sudbury area.

5. **Reference:** Union Responses to IGUA Interrogatories in EB-2015-0120, filed on 2015-05-27, IGUA 1, Page 3 of 7.

The evidence in EB-2015-0120 indicated that a fall of 2014 review of industrial customer consumption on the Sudbury system indicated that the system is operating below the minimum design specifications.

(a) Please indicate the number of customer service interruptions/curtailments (voluntary or otherwise) experienced on the Sudbury line during the winter of 2015/2016 (not including customer driven outages).

(b) Please provide the design day and average day demands in aggregate on the Sudbury system during each of the last 5 winters, and Union's forecast of these parameters for the next 5 winters.

(c) Please provide the aggregate daily contract demand (CD), firm hourly quantity (FHQ), and maximum hourly quantity (MHQ) for the contract customers served by the Sudbury system for the winter of 2015/2016.

(d) Please provide the total current installed capacity available to serve customers of the Sudbury system.

6. **Reference:** Union Responses to IGUA Interrogatories in EB-2015-0120, filed on 2015-05-27, Board Staff 2, Page 2 of 10.

In its responses to interrogatories in EB-2015-0120, Union indicated that it was working with a group of IGUA members to obtain the information required to complete the process Union identified for planning and constructing further expansions of the Sudbury system.

(a) Please advise of the steps that Union has undertaken since May 2015 to obtain said information as well as of the outcome(s) of these steps.