



Jay Shepherd

Professional Corporation
2200 Yonge Street
Suite 1302
Toronto, ON M4S 2C6

BY EMAIL and RESS

June 2, 2016
Our File: EB20160118

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2016-0118 – Union DVA and ESM Disposition – SEC Interrogatories

We are counsel to the School Energy Coalition (“SEC”). Enclosed, please find interrogatories on behalf of SEC.

Yours very truly,
Jay Shepherd P.C.

Original signed by

Mark Rubenstein

cc: Wayne McNally, SEC (by email)
Applicant and intervenors (by email)

T. (416) 483-3300 F. (416) 483-3305

mark.rubenstein@canadianenergylawyers.com
www.canadianenergylawyers.com

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B;

AND IN THE MATTER OF an Application by Union Gas Limited for an order or orders clearing certain non-commodity related deferral accounts and sharing utility earnings pursuant to a Board-approved earnings sharing mechanism;

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

SEC-1

[Ex.A-1, p.12] Please explain the reasons behind the significant changes in short-term firm peak storage value at Dawn in 2015.

SEC-2

[Ex.A-1, Appendix A-2] Please explain the variance in the 2015 actual base exchange revenues compared to what was approved in 2013.

SEC-3

[A-5, p.34] Please provide the forecasted additional costs to Union if TransCanada's STS services application is granted. Please provide details on the other "options to rebalance portfolio" available to Union.

Respectfully submitted on behalf of the School Energy Coalition this 2nd day of June, 2016

Original signed by

Mark Rubenstein
Counsel for the School Energy
Coalition