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June 2, 2016

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Walli,

**RE: EB-2016-0118 Union Gas Limited: Application for Approval to dispose of
Amounts recorded in certain 2015 Deferral Accounts and for approval of its
Earnings Sharing Amount**

Please find enclosed the interrogatories of the Ontario Greenhouse Vegetable Growers in the above noted proceeding.

Yours very truly,



Michael R. Buonaguro

CC: All Participants

UNION GAS LIMITED
Application for Approval to dispose of Amounts recorded in certain 2015 Deferral
Accounts and for approval of its Earnings Sharing Amount

INTERROGATORIES OF THE ONTARIO GREENHOUSE VEGETABLE
GROWERS
FOR
UNION GAS LIMITED

June 2, 2016

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Interrogatory #1

Ref: Exhibit A Tab 1 page 23 of 53

Preamble:

The 2015 target NAC for each rate class was approved by the Board in Union's 2015 Rates proceeding (EB-2014-0271). The 2013 actual NAC, weather normalized using the 2015 weather normal, was used to determine the 2015 target NAC. Setting the 2015 target NAC based on the 2013 actual NAC recognizes that over the two-year span to the current year, any saved volumes and associated lost revenues due to DSM activities will be captured by the variance between the target and actual consumption. This is due to the inclusion of the DSM saved volumes within the actual reported consumption.

- a) Please confirm that 2015 base rates were calculated without any adjustments to account for increases or decreases in normalized average consumption relative to 2013 actuals. If not confirmed, please explain and quantify any adjustments made to 2015 base rates to account for increases or decreases in normalized average consumption relative to 2013 actuals.
- b) Assuming a) is confirmed, please calculate the impact on the 2015 earnings sharing amounts had 2015 rates incorporated an adjustment to reflect a forecast change in normalized average consumption. For the purposes of this question please assume that the adjustment would have been exactly equal to the variance captured in the NAC Deferral Account for 2015.