**INTERROGATORIES FROM THE CONSUMERS COUNCIL OF CANADA**

**FOR UNION GAS LIMITED**

**EB-2016-0296**

**GENERAL QUESTIONS:**

**CCC-1**

Could the proposed merger between Spectra Energy and Enbridge Inc. have any impacts on Union’s proposed Compliance Plan? For example, will Union and Enbridge be permitted to have separate strategies once the merger takes place? Please explain how the merger could impact the plan.

**COMPLIANCE PLAN:**

**CCC-2**

**Reference: Ex. 3/p. 2**

The evidence states that Union has not included abatement or long-term investments in its 2017 Compliance Plan beyond existing initiatives such as DSM. Does Union intend to pursue any actual such projects in 2017 that could lower GHG emissions from its own facilities or from customers beyond the current DSM initiatives. If so, please list those activities.

**CCC-3**

**Reference: Ex. 3/p. 9**

What is the cost of the ClearBlue consulting work (actual and forecast) and how are these costs to be recovered? What is the cost (actual and forecast) of all other related consulting engagements related to Union’s Cap and Trade Compliance Plan development, and how are these costs to be recovered?

**CCC-4**

**Reference: Ex. 3/p. 14**

The evidence states that Union’s 2017 Compliance Plan demonstrates prudent procurement and compliance practices. How does Union intend to demonstrate to its customers that its activities related to Cap and Trade are prudent in light of the confidentiality restrictions?

**CCC-5**

**Reference: Ex. 3/p. 28**

What is the current balance in the Greenhouse Gas Emissions Impact Deferral Account?

**CCC-6**

**Reference: Ex. 3/p. 32**

Please provide a detailed breakdown of the $670,000 in consulting costs. Does this include work undertaken in 2016?

**CCC-7**

**Reference: Ex. 3/p. 34**

The evidence sets out a list of risks that Union has identified related to its 2017 Compliance Plan. These include:

* Forecast volume and auction purchase variability
* Price and foreign exchange risk
* Liquidity risk
* Credit and counterparty risk
* Non-compliance risk
* Government and legislation risk

For each of the risks identified, please explain who will bear that risk. Will it be Union’s ratepayers or its shareholders?

**CUSTOMER OUTREACH:**

**CCC-8**

**Reference: Ex. 5/p. 1**

What is the total cost of Union’s customer outreach related to the Cap and Trade Program? Please provide all costs incurred to date and the forecast cost for the remainder of 2017. What is the expected annual on-going cost? Has Union collaborated with Enbridge with respect to customer outreach and messaging? If not, why not? Has Union sought funding from the Provincial Government to support customer outreach given this is a government mandated program? If not, why not? How will these costs be recovered? What relief is Union seeking from the OEB in this proceeding regarding these costs?