



**BY EMAIL and RESS**

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Ontario Energy Board  
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June 16, 2017  
Our File: EB20170091

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2017-0091 – Union Gas Ltd. 2016 ESM – SEC Interrogatories**

We are counsel to the School Energy Coalition ("SEC"). Pursuant to Procedural Order No.1, please find SEC's interrogatories.

Yours very truly,  
**Shepherd Rubenstein P.C.**

*Original signed by*

Mark Rubenstein

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

**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**

[A-1, p.23-23] Please explain the drivers in the variance between actual and target NAC.

**SEC-2**

[A-1, p.27] Account No. 179-135 Unaccounted for Gas (“UFG”) Volume Deferral:

- a. Please explain the cause of the increase in UFG percentage from 0.219% (2013 Board approved) to 0.427 (2016 actuals).
- b. What is Union doing to reduce UFG?

**SEC-3**

[A-1, p.28-36] With respect to Account No. 179-136 Parkway West Project Costs:

- a. [p.31] Please provide further details regarding the difference in LCU capital costs as compared to approved.
- b. [p.32] Does the applicant expect further expenditures to be incurred for the Parkway West project after 2016 that would be eligible for inclusion in the variance account? If so, please provide details.
- c. What is the forecasted final cost of the project, if it has not yet been fully completed?

**SEC-4**

[A-1, p.36-44] With respect to Account No. 179-137 Brantford-Kirkwall/Parkway D Project Costs:

- a. [p.39] Please provide further details regarding the difference in actual compressor capital costs as compared to approved cost.
- b. [p.43] Does the applicant expect further expenditures to be incurred for the Brantford-Kirkwall/Parkway D Project after 2016 that would be eligible for inclusion in the variance account? If so, please provide details and a forecast of those costs.
- c. What is the forecasted final cost of the project, if it has not yet been fully completed?

**SEC-5**

[A-1, p.48-54] With respect to Account No. 179-142 Lobo C Compressor/Hamilton-Milton Pipeline Project Costs:

- a. Does the applicant expect further expenditures to be incurred for the Lobo C Compressor/Hamilton-Milton Pipeline Project after 2016 that would be eligible for inclusion in the variance account? If so, please provide details and a forecast of those costs.
- b. What is the forecasted final cost of the project, if it has not yet been fully completed?

**SEC-6**

[A-1, p.71] With respect to No. 179-152 Greenhouse Gas Emissions Impact Deferral Account (“GGEIDA”):

- a. Please provide the title and a brief job description of each of the listed FTEs.
- b. Please confirm that each one of those positions is incremental, and if the employees holding those positions were previously employed by Union, their most recent position was filed around the time they took their new GHG related position.

**SEC-7**

[A-2, p.4] Please provide all costs included in the ESM calculation related directly or indirectly to the merger of Spectra Energy and Enbridge Inc.

**SEC-8**

[A-2, App A, Sched 13] Please explain the variances between 2016 and 2015 actuals related to the following expenses:

- a. Demand Side Management Programs
- b. Inbound Affiliate Services

Respectfully submitted on behalf of the School Energy Coalition this June 16<sup>th</sup>, 2017.

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy  
Coalition