

December 11, 2017

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
Toronto, Ontario
M4P 1E4

RE: EB-2017-0087 – Union Gas Limited (“Union”) 2018 Rates – Response to Federation of Rental-housing Providers of Ontario (“FRPO”) letter of Request for Additional Information

Dear Ms. Walli,

On December 6, 2017 FRPO filed a letter of “Request for More Fulsome Responses to IR’s” (the “Letter”). The Letter asked for additional information to Union’s interrogatory responses at Exhibit B.FRPO.11 and Exhibit B.FRPO 7. The Letter further asked that Union file this additional information with the Ontario Energy Board (the “OEB”), with a copy to intervenors, by December 12, 2017; that is, in advance of the OEB-ordered Settlement Conference beginning December 13, 2017.

FRPO’s delayed request for additional information is inappropriate considering both the timeline set out in Procedural Order No. 1 and that Union filed its responses to interrogatories on November 20, 2017.

Notwithstanding the above, and while Union maintains that its original interrogatory responses were responsive and complete, please find below additional information in response to FRPO’s Letter related to Exhibit B.FRPO.11 and Exhibit B.FRPO7. This will be filed in RESS and copies will be sent to the OEB. In Union’s view, none of this information is relevant to 2018 rates.

Exhibit B.FRPO.11 – Additional Information Request

FRPO’s Letter clarified that the information requested relates to capacity sold on a short-term or interruptible basis. Union has already provided this information for the years 2014-2016 in its response at EB-2017-0091, Exhibit B.FRPO.6, and has reproduced it below for ease of reference.

2014	January	February	March	April	May	June	July	August	September	October	November	December
Revenue (\$ millions)	\$ 1.09	\$ 0.96	\$ 0.87	\$ 0.13	\$ 0.03	\$ 0.09	\$ 0.13	\$ 0.12	\$ 0.11	\$ 0.12	\$ 0.43	\$ 0.57
Utilization (PJ)	8.49	8.09	7.78	2.53	0.69	2.00	3.24	4.14	2.92	3.07	5.45	8.34
Average Rate (\$/GJ/day)	\$ 0.13	\$ 0.12	\$ 0.11	\$ 0.05	\$ 0.05	\$ 0.04	\$ 0.04	\$ 0.03	\$ 0.04	\$ 0.04	\$ 0.08	\$ 0.07
2015	January	February	March	April	May	June	July	August	September	October	November	December
Revenue (\$ millions)	\$ 0.59	\$ 0.95	\$ 2.17	\$ 0.78	\$ 0.20	\$ 0.22	\$ 0.21	\$ 0.21	\$ 0.23	\$ 0.23	\$ 0.30	\$ 0.31
Utilization (PJ)	7.76	6.68	11.89	2.66	5.90	6.79	6.55	6.68	4.31	4.01	2.87	2.93
Average Rate (\$/GJ/day)	\$ 0.08	\$ 0.14	\$ 0.18	\$ 0.29	\$ 0.03	\$ 0.03	\$ 0.03	\$ 0.03	\$ 0.05	\$ 0.06	\$ 0.10	\$ 0.11
2016	January	February	March	April	May	June	July	August	September	October	November	December
Revenue (\$ millions)	\$ 0.46	\$ 0.53	\$ 0.43	\$ 0.28	\$ 0.20	\$ 0.13	\$ 0.16	\$ 0.18	\$ 0.68	\$ 0.18	\$ 0.41	\$ 0.95
Utilization (PJ)	5.81	5.18	3.34	3.79	1.95	0.70	1.62	2.77	1.23	1.49	2.19	5.88
Average Rate (\$/GJ/day)	\$ 0.08	\$ 0.10	\$ 0.13	\$ 0.07	\$ 0.11	\$ 0.18	\$ 0.10	\$ 0.07	\$ 0.55	\$ 0.12	\$ 0.19	\$ 0.16

Additional information for year-to-date 2017 is included in the table below.

2017	January	February	March	April	May	June	July	August	September	October	November	December
Revenue (\$ millions)	\$ 1.00	\$ 1.00	\$ 0.81	\$ 0.37	\$ 0.06	\$ 0.26	\$ 0.10	\$ 0.08	\$ 0.09	\$ 0.08	\$ 0.78	
Utilization (PJ)	7.81	7.09	6.68	1.04	0.53	3.60	1.08	0.78	0.95	1.46	3.19	
Average Rate (\$/GJ/day)	\$ 0.13	\$ 0.14	\$ 0.12	\$ 0.36	\$ 0.11	\$ 0.07	\$ 0.09	\$ 0.11	\$ 0.09	\$ 0.06	\$ 0.24	

The above tables include revenues earned on all Short-Term and Interruptible transportation contracts on the Dawn Parkway System. These revenues contain contracts which utilize various receipt and delivery points, as well as both westerly and easterly flow. As a result, the average rate (\$/GJ/day) is not comparable to a firm M12 Dawn to Parkway rate.

Exhibit B.FRPO.7 – Additional Information Request

As stated in the Updated Settlement Agreement EB-2013-0365, Appendix B, p. 4, “Any Dawn to Kirkwall M12 capacity turned back to Union by ex-franchise shippers will be used to first, reduce the Parkway shortfall and secondly, to further reduce the PDO.”

Consistent with the Updated Settlement Agreement, and with Union’s pre-filed evidence (Exhibit A, Tab 2, p. 4, Table 1), only Dawn to Kirkwall capacity that was turned back to Union was considered in Union’s response at Exhibit B.FRPO.7 because only Dawn to Kirkwall capacity is being used to reduce the Parkway shortfall and to further reduce the PDO.

FRPO’s original interrogatory at Exhibit B. FRPO.7 was not specific in requesting turnback information for additional segments, as confirmed by FRPO in its Letter. Notwithstanding the above, and in an effort to provide additional information in support of achieving settlement, the table below includes turnback information for paths on the Dawn Parkway System other than Dawn to Kirkwall.

Path	November 1, 2017	November 1, 2018	November 1, 2019
Dawn to Parkway*	86,515 GJ/day	89,969 GJ/day	56,021 GJ/day
Kirkwall to Parkway	0 GJ/day	0 GJ/day	0 GJ/day

*excludes turnback which was allowed as part of the PDO Reduction Settlement Agreement

If you have any questions with respect to this submission please contact me at 519-436-4558.

Yours truly,

[Original signed by]

Adam Stiers
Manager, Regulatory Initiatives

c.c.: EB-2017-0087 Intervenors
Crawford Smith, Torys