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January 26, 2018

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

Dear Ms. Walli:

RE: EB-2017-0255 – Interrogatories of London Property Management Association to Union Gas

Please find attached LPMA's interrogatories with respect to the above noted proceeding to Union Gas.

Sincerely,

Randy Aiken

Randy Aiken
Aiken & Associates
Encl.

cc: Adam Stiers (Union Gas)
Valerie Bennett (OEB)
Ljuba Djurdjevic (OEB)
Intervenors

INTERROGATORIES OF THE
LONDON PROPERTY MANAGEMENT ASSOCIATION
TO UNION GAS

1.1 Are the volume forecasts used reasonable and appropriate?

Interrogatory #21

Ref: Exhibit 2, page 2

Is there a more recent list of capped participants available than the June 7, 2017 list used by Union? If so, are there any significant differences (in terms of volumes) that would result from use of the more up-to-date list?

Interrogatory #22

Ref: Exhibit 2, page 5

a) How does Union estimate the volume for capped participants in the general service market? For example, does Union calculate the average use for the capped participants based on their historical usage, or does Union assume that the average use for capped participants is equal to the average use of the rate class they are in?

b) For each general service rate class that includes capped participants, please provide the average use for all customers in the class and for the capped participants in the class.

Interrogatory #23

Ref: Exhibit 2, pages 4-5

Does Union take into account customer shrinkage estimates when calculating the total number of billed customers? If not, is this a change from the methodology used in EB-2016-0296?

Interrogatory #24

Ref: Exhibit 2, page 5

Please explain and show how the weather normal explanatory variable was determined.

Interrogatory #25

Ref: Exhibit 2, page 5

Please explain how the GIF volumes of 7,035,000 m³ was forecast.

Interrogatory #26

Ref: Exhibit 2, page 6 & Schedule 1

a) How does Union estimate the throughput to capped participants that are included in the LDVCI and greenhouse market sectors?

b) Please breakout lines 4 through 7 in Schedule 1 for the contract market into the LCI/greenhouse market sector (where Union used an econometric approach to the forecast) and those customers included in the bottom up forecast methodology.

1.2 Are the GHG emissions forecasts reasonable and appropriate?

Interrogatory #27

Ref: Exhibit 2, page 9

Please add a column to Table 1 to reflect actual GHG emissions for 2017.

1.10 Are the gas utility's proposed greenhouse gas abatement activities reasonable and appropriate?

Interrogatory #28

Ref: Exhibit 3, Tab 4, page 25-34

a) Is Union working with Enbridge, Epcor and energy associations to explore the stage 2 customer abatement measures noted? If not, why not?

b) How has Union ensured that there is no overlap or duplication of effort and cost between Union and other parties that may be investigating similar projects?

4.1 Are the proposed deferral account balances reasonable and appropriate?

Interrogatory #29

Ref: Exhibit 6, page 6

- a) Did Union incur any costs associated with external legal counsel in 2016? If yes, please quantify and indicate where in Table 1 these costs have been included. If no, did Union incur costs associated with internal legal counsel? If so, please quantify and confirm that these costs are included in salaries and wages in Table 1.
- b) Did Union incur any costs related to customer outreach and information in 2016? If yes, please quantify and indicate where in Table 1 these costs have been included.

5.1 Is the proposed manner to recover costs reasonable and appropriate?

Interrogatory #30

Ref: Exhibit 7, Tab 1, pages 4-5

Given that rates were not declared interim effective January 1, 2018, what mechanism is Union proposing to recover the difference between approved rates for 2018 and the current rates being charged for the period January 1, 2018 to the implementation date of the new rates? Please distinguish between the general service and contract rate classes, if appropriate.

Interrogatory #31

Ref: Exhibit 7, Tab 2, page 2

- a) Did Union consider any other allocation methodology for the GGEIDA costs? If yes, please provide details on what other methodologies were considered and why they were rejected.
- b) Will the costs be recovered from all customers – system gas supply customers, direct purchase customers and large final emitters (including voluntary participants and wholesale customers)?
- c) How does Union allocate its administrative costs that are related to the purchase of its system gas supply?
- d) If the Board directed Union to allocate the GGEIDA costs based on volumes by rate

class, what would be the impact on the costs by rate class, as shown in Exhibit 7, Tab 2, Schedule 1?

5.2 Are the tariffs just and reasonable and have the customer-related and facility-related charges been presented separately in the tariffs?

Interrogatory #32

Ref: Appendices A & B

Other than the changes for rates M9, M10 and T3, is Union proposing any changes to the way the customer-related and facility-related charges in the proposed rate schedules? If yes, please explain fully all of the changes.

6. What is the implementation date of the final rates and how will the final rates be implemented?

Interrogatory #33

Given the Board's decision to not approve interim rates effective January 1, 2018, what is Union's current proposal for an implementation date of the final rates?