

**Ontario Energy  
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February 23, 2018

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
27th Floor, 2300 Yonge Street  
Toronto ON M4P 1E4

Dear Ms. Walli:

**Re: Union Gas Limited  
Application for Certificates of Public Convenience and Necessity for  
Norfolk County, the County of Elgin and the County of Middlesex  
Board File Number EB-2017-0108**

Pursuant to Procedural Order No. 4, please find attached OEB staff's  
interrogatories in the above-noted proceeding.

Yours truly,

*Original signed by*

Azalyn Manzano  
Case Manager

/ attach.

## **UNION GAS LIMITED**

### **Application for Certificates of Public Convenience and Necessity for Norfolk County, the County of Elgin and the County of Middlesex**

**EB-2017-0108**

#### **OEB STAFF INTERROGATORIES**

##### **Norfolk County**

###### Interrogatory 1

Ref: Updated Evidence, Exhibit A, Tab 1, p. 4, Schedule C

Preamble:

Union Gas identified area (a) in Schedule C as Lot 1 in Concessions 9, 10, 11 and 12 where Union Gas and EPCOR's certificates of public convenience and necessity (CPCNs) overlap. Union proposes that its CPCN for Norfolk County should cover the overlap area and that this area should be removed from EPCOR's CPCN. Union Gas also identified uncertificated areas (b) and (c) in the north half of Lots 2, 3, 4, and 5 in Concession 7 and all of Lots 2, 3, 4 and 5 in Concession 8. Union Gas states that it has facilities within the north half of Lots 2, 3 and 5 in Concession 7 and all of Lots 4 and 5 in Concession 8. Union Gas also proposes to include the currently uncertificated areas (b) and (c) in Union Gas' CPCN, except for the area being requested by OMLP (identified as area (d)).

Questions:

- a) Please explain whether or not Union Gas' expects further growth of its distribution system in this area of Norfolk County over the next five years and how this might impact the limited CPCN that Union Gas is requesting.
- b) Please provide a customer density map overlay on top of the Norfolk County map in Schedule C.

##### **County of Elgin**

###### Interrogatory 2

Ref: Updated Evidence, Exhibit A, Tab 1, p. 4

Preamble:

Union Gas' position is that franchise agreements and CPCNs approved for the upper-tier of a two-tier municipality apply only with respect to the areas over which the upper-tier of the municipality has jurisdiction.

Question:

Please provide references to legislation or legal/tribunal decisions supporting this position.

### Interrogatory 3

Ref: Updated Evidence, Exhibit A, Tab 1, pp. 9-10

Preamble:

Union Gas states that it provides service to two EPCOR residential customers and two other locations in the Township of Malahide. Union Gas proposes that these locations be addressed through the issuance of a CPCN to Union Gas for the Township of Malahide, limited to Lot 24 in Concession 11.

Question:

Please explain whether or not Union Gas' expects any further growth of its distribution system in the Township of Malahide over the next five years and how this might impact the limited CPCN that Union Gas is requesting.

### Interrogatory 4

Ref: Updated Evidence, Exhibit A, Tab 1, pp. 10-11, Schedule J

Preamble:

Part of the area included within Union Gas's proposed certificate boundaries for Central Elgin includes Lots 19 to 22, in Concession 10. This area was not included with the other uncertificated areas identified in Union Gas' CPCN for Central Elgin (EB-2007-0810).

Question:

- a) Please confirm if Union Gas intends to include this area in its CPCN, and if so:
  - i) Please provide the rationale for including this area within Union Gas' CPCN.

- ii) Please provide a draft CPCN amending Union Gas' existing CPCN for Central Elgin to include this area.

### Interrogatory 5

Ref: Updated Evidence, Exhibit A, Tab 1, p. 10, Schedules G(2) and J

Preamble:

Union Gas states that EPCOR holds a CPCN giving EPCOR the right to service an area in Central Elgin previously known as the Village of Belmont.

Questions:

- a) Please provide a map of the former Village of Belmont, marked with boundaries, and lot and concession numbers.
- b) Please confirm if Union Gas' proposed boundaries in that area of Central Elgin coincide with the boundaries of the former Village of Belmont, and provide a rationale if they do not.
- c) Please provide a customer density map overlay on top of each of Schedules G(2) and J, including a separate map for inset A.
- d) Please provide a draft CPCN for Union Gas for Central Elgin which indicates (and excludes) the lot and concession numbers for the areas which Union Gas proposes to include in EPCOR's CPCN for Central Elgin.

## **County of Middlesex**

### Interrogatory 6

Ref: Updated Evidence, Exhibit A, Tab 1, p. 13, Schedule N

Preamble:

Union Gas states that EPCOR holds a CPCN giving EPCOR the right to service an area in Middlesex County, particularly in the southeastern portion around Thames Centre, previously known as North Dorchester.

Questions:

- a) Please provide a map of the former Township of North Dorchester marked with boundaries, and lot and concession numbers.
- b) Please confirm if Union Gas' proposed boundaries in that area of Middlesex County coincide with the boundaries of the former Township of North Dorchester, and provide a rationale if they do not.
- c) Please provide an inset of the southeastern portion of the County of Middlesex where Union Gas has proposed boundary lines, marked with current municipal boundaries, lot and concession numbers, and with a customer density map overlay.
- d) Although EPCOR's CPCN for North Dorchester (E.B.C 111 and 119) includes:
  - The south halves of Lots B, 1, 2, 3, 4 and 5, in Concession 6
  - The whole of Lot A in each of Concessions 2, 3, 4, 5 and 6
  - That part of Lot A, in Concession 1 lying south of Highway 401,

Union Gas' proposed certificate area for EPCOR excludes these areas. Please provide the rationale for excluding these areas.

- e) Union's proposed certificate area for EPCOR includes the west half of Nilestown; and an area south of Highway 401 bounded on the east by Westchester Bourne, all the way to just west of Belmont and north of Willsie Bourne. Please identify the former municipality/municipalities which make up this area, and which CPCNs provide authorization for which utility/utilities provides service in this area.
- f) Please provide draft CPCNs for Union Gas for the relevant current lower-/single-tier municipalities in this area, indicating (and excluding) the lot and concession numbers for the areas which Union Gas proposes to include in EPCOR's certificate for the same municipalities.