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March 8, 2018

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

Dear Ms. Walli,

RE: EB-2017-0323 - Interrogatories of London Property Management Association

Please find attached the interrogatories of the London Property Management Association in the above noted proceeding.

Yours very truly,

Randy Aiken

Randy Aiken
Aiken & Associates

c.c. Adam Stiers (Union Gas)

Union Gas Limited

Application to dispose of balances in certain deferral and variance accounts related to the delivery of conservation programs in 2015.

**INTERROGATORIES
OF
LONDON PROPERTY MANAGEMENT ASSOCIATION**

March 8, 2018

Interrogatory #1

Ref: Exhibit A, Tab 3, Appendix A, Schedule 3

Please explain why Union under spent on DSM activities in the North while over spending on DSM activities in the South, notable in Rates M1, M4 and M7.

Interrogatory #2

Ref: Exhibit A, Tab 4, Appendix A, Schedule 1 & Exhibit A, Tab 3, Table 2

For each of the line items shown in Table in Exhibit A, Tab 3, please show the allocation to rate classes of the actual audit adjusted results in the same format as shown in Exhibit A, Tab 4, Appendix A, Schedule 1.

Interrogatory #3

Ref: Exhibit A, Tab 4, pages 2-3

Union proposes to allocate the balance in the Demand Side Management Incentive Deferral Account (“DSMIDA”) (no. 179-126) to rate classes in proportion to the actual DSM spending by rate class in 2015 for scorecards where Union has achieved a DSM incentive.

- a) Please confirm that Union is not allocating any of the DSMIDA balance to rates T1, T2, or 100 because Union did not achieve a DSM incentive related to these customers.
- b) Has Union applied this approach to the allocation of the DSMIDA balances for previous years in which it did not achieve a DSM incentive for some rate classes? If yes, please provide details.
- c) If the response to part (b) is no, please explain the rationale for not allocating any of the DSMIDA balance to the rate classes where Union did not achieve a DSM incentive.

Interrogatory #4

Ref: Exhibit A, Tab 3, Table 5

- a) How has Union allocated the low-income scorecard incentive achieved in previous year dispositions? In particular, which rate classes are allocated amounts related to the low-income scorecard incentive?

b) If the allocation provided in the response to (a) above is different than the allocation of the low-income DSM budget variance described at page 7 of Exhibit A, Tab 3, please explain the different allocations proposed.

Interrogatory #5

Ref: Exhibit A, Tab 4, Appendix A & Appendix B

a) Please provide versions of Schedule 2 (page 1 only) and Schedule 3 of Appendix A assuming rate implementation takes place as part of the July 1 QRAM.

b) Please provide versions of Schedule 2 (page 1 only) and Schedule 3 of Appendix B assuming rate implementation takes place as part of the July 1 QRAM.

c) Please confirm that the one-time adjustment for contract rate classes will not be impacted by a delay from the implementation from the April QRAM to the July QRAM. If this cannot be confirmed, please explain fully and provide updated Schedule 2 (page 2) of both Appendix A and Appendix B.