

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B, as amended;

AND IN THE MATTER OF the application of Enbridge Gas Distribution Inc. and Union Gas Limited for approval to amalgamate Enbridge Gas Distribution Inc. and Union Gas Limited.

**INTERROGATORIES
OF THE MUNICIPALITY OF CHATHAM-KENT (“CK”) TO
ENBRIDGE GAS DISTRIBUTION INC. (“ENBRIDGE”)
AND UNION GAS LIMITED (“UNION”)**

I Present Circumstances - CK

CK- 1

For each of the categories of employment, listed below, located at the head office of Union in CK, please indicate how many employees are there in each category.

The categories of employment are:

- Corporate
- Human resources
- Regulatory affairs
- Procurement
- Legal
- Finance
- Information technology
- Asset management and engineering services
- Facilities (property)
- Logistics
- Fleet services

- Metering
- Customer service (call centre, billings, collections)
- Construction
- Trouble response
- Control room

If these categories of employment do not correspond to the categories used by Union, please substitute the categories used by Union and answer this interrogatory accordingly.

II Merger Synergies

CK- 2

Please provide copies of all studies, reports and analyses, whether internal or external, with respect to the nature, extent, and location of the synergies to be achieved by the merger.

CK- 3

What are the expected monetary benefits to Enbridge's shareholders, over the course of the ten-year rebasing period, resulting from the merger?

CK- 4 Exhibit B, Tab 1, p. 17.

- (a) What activities will there be at the Bloomfield Road "Information Technology Centre"?
- (b) How many employees at what levels of skill and responsibility will there be at the Bloomfield Road "Information Technology Centre"?
- (c) What portion of the employment at the Bloomfield Road "Information Technology Centre" will be new to CK?

CK- 5 Exhibit B, Tab 1, p. 17.

- (a) What activities will there be at the "Powerhouse" facility at the 50 Keil Drive location?
- (b) How many employees at what levels of skill and responsibility will there be at the "Powerhouse" facility?
- (c) What portion of the employment at the "Powerhouse" facility will be new to CK?

III Present Circumstances – Enbridge

CK- 6

For each of the categories of employment, listed below, located at the head office of Enbridge in Toronto, please indicate how many employees are there in each category.

The categories of employment are:

- Corporate
- Human resources
- Regulatory affairs
- Procurement
- Legal
- Finance
- Information technology
- Asset management and engineering services
- Facilities (property)
- Logistics
- Fleet services
- Metering
- Customer service (call centre, billings, collections)
- Construction
- Trouble response
- Control room

If these categories of employment do not correspond to the categories used by Enbridge, please substitute the categories used by Enbridge, and answer this interrogatory accordingly.

CK- 7

In the event that the OEB determines that the Undertakings are not binding on the merged entity, what assurances will Union/Enbridge provide that the interests of CK protected by the Undertakings will continue to be protected?

9 March 2018

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