

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c.15, (Schedule B) (the “Act”);

AND IN THE MATTER OF an Application by Union Gas Limited for an order granting leave to construct a natural gas pipeline in the Counties of Oxford and Perth under Section 90 of the Act.

INTERROGATORIES

FROM THE

SCHOOL ENERGY COALITION

1. [General] Please provide copies of all reports, memoranda, analyses, emails or other documents of any type that have as their subject, or one of their subjects, the modification, replacement or deferral of the Stratford Reinforcement Project as a result of DSM, whether general DSM programs, targeted load reduction programs, or otherwise.
2. [General] Please provide a full timeline and details of all actions taken by the Applicant with respect to the Stratford Reinforcement Project to comply with the following Board direction from EB-2014-0134:

“As part of all applications for leave to construct future infrastructure projects, the gas utilities must provide evidence of how DSM has been considered as an alternative at the preliminary stage of project development.”

In order for the gas utilities to fully assess future distribution and transmission system needs, and to appropriately serve their customers in the most reliable and cost-effective manner, the Board is of the view that DSM should be considered when developing both regional and local infrastructure plans. This is consistent with the direction outlined in the LTEP and the Conservation Directive, which state that the Board shall take steps it considers appropriate towards implementing the government’s policy of putting conservation first in electricity distributor and gas distributor infrastructure planning processes at the regional and local levels, where cost-effective and consistent with maintaining appropriate levels of reliability. The Board expects the gas utilities to consider the role of DSM in reducing and/or deferring future infrastructure investments far enough in advance of the infrastructure replacement or upgrade so that DSM can reasonably be considered as a possible alternative. If a gas utility identifies DSM as a practical alternative to a future infrastructure investment project, it may apply to the Board for incremental funds to administer a specific DSM program in that area where a system constraint has been identified.” [emphasis added]

3. [p. 3] Please file a copy of the FHG Transmission System FBP referred to. Please provide details of all changes to that FBP since the Board's direction in EB-2014-0134, cited above.
4. [p. 5 and Schedule 6] Please explain why, if demand already exceeds capacity on this line, the Applicant waited until now to seek Board approval for this project.
5. [p. 6] Please provide details of all geo-targeted DSM projects, programs or offerings implemented or considered by the Applicant since the Board's EB-2014-0134 direction, whether related to this project or any other. Please provide copies of all internal or external reports, memoranda, presentations, or other communications since that time dealing with geo-targeted DSM.
6. [p. 7] Please provide details of the forecast future DSM activity included in the Design Day requirement.
7. [p. 7, para. 30] Please provide all studies or analyses done to support the statement "any reduction in consumption as a result of DSM programs is not sufficient to offset load growth".
8. [p. 16] Please provide the annual revenue requirement that the Applicant expects to recover in rates, allocated by rate class, under the forecast ICM for each of the years 2019 to 2027. If the full calculation has not been made, please provide an estimate, along with the supporting assumptions for that estimate.
9. [Schedule 13] Please confirm that, during the lifetime of the proposed pipeline, there is no crossover point in which the annual cash from the project exceeds the annual costs, including costs related to capital. Please provide a dollar estimate of the total subsidy to be provided by existing customers for the new attachments expected on this pipeline over its total life.

Respectfully submitted on behalf of the School Energy Coalition this January 17, 2019.

Jay Shepherd
Counsel for the School Energy Coalition