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**RECEIVED**

JUN 08 2015

June 2, 2015

Ms Kirsten Walli  
Board Secretary  
Ontario Energy Board  
27th floor  
2300 Yonge Street  
PO Box 2319  
Toronto, ON  
M4P 1E4

*EB 2015-0029*

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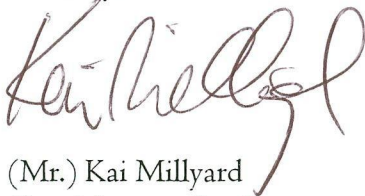
ONTARIO ENERGY BOARD

RE: EB-2015-0029 INTERROGATORIES

Dear Ms Walli,

I enclose 2 copies of interrogatories regarding avoided costs by GEC to Union Gas on its 2015-2020 DSM Plan evidence. These have also been sent to the utility, and PDF versions are being emailed to you.

Sincerely,



(Mr.) Kai Millyard  
Case Manager for the  
Green Energy Coalition

encl.

Cc: Vanessa Innis  
Intervenors

## **Green Energy Coalition**

### **Interrogatories on Avoided Costs for Union Gas**

61. Exh. A/T2, Appendix A, p. 25-26
- Please provide the "revised avoided gas cost methodology" that incorporates ICF's four refinements.
  - Please explain how each of the four refinements is incorporated.
62. Exh. A/T2, Appendix B
- Please provide a breakdown of the annual unit avoided gas costs by type (e.g., commodity, base capacity, storage, peaking capacity, T&D, CO<sub>2</sub> costs).
  - Please provide all reports, analyses and workpapers supporting the avoided costs.
  - Please provide all source documents supporting the avoided costs.
  - If Union assumes that any avoided gas or other avoided costs originate in the US, priced in US dollars, please provide the Company's forecast of the foreign exchange rate from US to Canadian dollars.
  - Please explain how Union differentiates avoided gas costs between heating measures, baseload measures, and industrial measures, and explain how industrial load differs from base load.
63. Exh. A/T2, Appendix B
- Please provide all forecasts of gas commodity prices at hubs relevant to the pricing of Union's marginal gas sources produced since January 2014 and in the possession of Union.
  - For each pricing point for which Union has access to futures or forward prices, please provide the most recent futures or forward prices for natural gas available to Union for each exchange or broker for which EGD I has such data.
  - Please provide the most recent futures or forward prices for natural gas basis from major trading points to trading hubs relevant to Union, for each exchange or broker for which Union has such futures or forward prices.
64. Exh. A/T2, Appendix B
- Please provide all reports, analyses and workpapers supporting the avoided electric costs.
  - Please explain how the estimate of avoided electric costs reflect generation capacity costs, required reserves, line losses, the costs of renewable energy, CO<sub>2</sub> costs, and avoided T&D.
65. Exh. A/T2, Appendix C
- Please provide all data and instructions provided to ICF by Union with regard to the development of this document.
  - Please provide all memoranda, draft reports, presentations, and other materials provided to Union by ICF regarding the development of this document and its results.
66. Exh. A/T2, Appendix C, p. 21

- a. Please provide the SENDOUT model analyses supporting Union's current avoided costs.

67. Exh. A/T2, Appendix C, p. 23

- a. Please provide all forecasts of gas commodity prices at hubs relevant to the pricing of EGDI's marginal gas sources produced since January 2014 and in Union's possession.
  - b. For each pricing point for which Union has access to futures or forward prices, please provide the most recent futures or forward prices for natural gas available to Union for each exchange or broker for which EGDI has such data.
  - c. Please provide the most recent futures or forward prices for natural gas basis from major trading points to trading hubs relevant to EGDI, for each exchange or broker for which Union has such futures or forward prices.
68. Is the company in possession of any studies or information concerning the scale of Demand Reduction Induced Price Effects (DRIPE) in Ontario? If so please provide.