## EB-2006-0021

## Pollution Probe's Questions for Technical Conference to Union Gas

1. Reference Ex. A, Tab 2, page 3

Please state Union's total DSM expenses from 1995 to 2005 inclusive.

2. Reference Ex. A, Tab 2, page 3

Please state the total TRC net benefits created by Union's DSM programmes from 1995 to 2005 inclusive.

3. Reference Ex. A, Tab 2, page 6

"To encourage a reduced regulatory burden ... Union proposes that DSM be conducted under multi-year rate plans."

- a) Please state the number of hearing days devoted to DSM in each of Union's rate hearing from fiscal 2003 to the present as a percentage of the total number of hearing days;
- b) Please state Union's DSM-related regulatory costs for each of its annual rate hearings from fiscal 2003 to the present;
- c) Please state Union's total regulatory costs for each of its annual rate hearings from fiscal 2003 to the present
- 4. Reference Ex. A, Tab 2, page 28 and Issue 14.3

According to Union, "A maximum budget of 2% of distribution revenue should be established in rates for the duration of the fuel switching plan."

- a) Please explain why Union believes that it would be in the public interest to cap its fuel switching budget at 2% of its distribution revenues.
- b) Please provide the dollar value of 2% of Union's distribution revenue.
- c) Please state the annual reduction in electricity demand (MW) that could be achieved if Union's fuel switching budget equaled 2% of its distribution revenues.
- d) What tests does Union believe should be used to measure the cost-effectiveness of its fuel switching programmes?
- e) What market sectors would be priority targets for Union's fuel switching programmes?

## 5. Reference: Issue 1

- a) Please state Union Gas' forecast in-franchise natural gas distribution volumes for 2007, 2008 and 2009.
- b) Please state Union's forecast total in-franchise revenue requirement (distribution revenues plus commodity costs) for 2007, 2008 and 2009.

## 6. Reference: Issue 5

- a) Please state Union's forecast of its rate base in 2007, 2008 and 2000.
- b) Please state Union's OEB-approved debt to equity ratio.
- c) Please state Union's marginal corporate income tax rate.