

June 2, 2006

Ontario Energy Board 2300 Yonge Street, Suite 2700 Toronto, ON M4P 1E4

Attention: Mr. Peter O'Dell, Acting Board Secretary

Re: EB-2005-0551 – Union Gas Submission

Dear Mr. O'Dell:

Attached please find 13 copies of the following:

- <u>Updated</u> Statement of Qualifications for Union's Panel
- Undertaking responses 43a & 43b from Technical Conference May 16-19, 2006
- Supplemental Evidence submitted (correction made to Header of document)

This material was also provided to the Board and all intervenors electronically in searchable format on June 16, 2006.

If you have any questions concerning this filing please call me at (519) 436-5382.

Yours truly,

the &

Connie Burns, CMA, PMP Manager, Regulatory Initiatives

cc: Glenn Leslie, Blakes All EB-2005-0551 Intervenors

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Statement of Qualifications Stephen W. Baker

Experience:Union Gas LimitedVice-President, Business Development & Commercial Accounts
2005Vice-President, Gas Supply & Market Planning
2003Vice-President, Gas Supply Services
2002Vice-President, Gas Supply Services
2002

Director, Products & Pricing 1999

Director, Regulatory Affairs 1998

Manager, Regulatory Proceedings 1995

Manager, Forecasts and Budgets 1992

Manager, Regulatory Accounting and Rate Case Administration 1990

Senior Corporate Tax Specialist 1989

Clarkson Gordon – London

Senior Staff Accountant 1987

Co-op Student 1985

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Chartered Accountant 1987
Certified Management Accountant 1988
Master of Accounting University of Waterloo – 1987
Bachelor of Arts – Honours Chartered Accountancy Studies University of Waterloo - 1986
Institute of Chartered Accountants of Ontario
Canadian Institute of Chartered Accountants
The Society of Management Accountants of Ontario
(Ontario Energy Board)
RP-2002-0130 RP-1999-0017 RP-2000-0110 E.B.R.O. 486 E.B.R.O. 476-02 E.B.R.O. 478 E.B.R.O. 470

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Statement of Qualifications Carol Cameron

Experience:	Union Gas Limited
	S&T Specialist 2005 - 2006
	Buyer, Asset Acquisition 2004
	Senior Analyst, Finance 2003
	S&T Account Manager 2000-2002
	Customer Service Representative 1998-1999
	S&T Nominations Analyst 1996-1997
Education:	Bachelor of Commerce University of Windsor, 1993
Appearances:	Ontario Energy Board
	EB-2005-0201 -2006 Trafalgar Facilities Expansion Program

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Statement of Qualifications Mark Isherwood

Experience:	Union Gas Limited Director, Business Development, Storage and Transmission, 2005
	Director, Acquisition, 2002
	Strategic Manager, Industrial Markets, 1999
	Manager, Industrial Markets, 1989
	Supervisor, Contract Sales, 1988
	Coordinator, Direct Purchase, 1986
	Operations Engineer, 1985
	Assistant to Operations Engineer, 1982
Education:	Master of Business Administration - University of Windsor, 1990
	Bachelor of Commerce - University of Windsor, 1988
	Bachelor of Engineering (Chemical) - University of Waterloo, 1982
Memberships:	Professional Engineers of Ontario
Appearances:	Ontario Energy Board
	EB-2005-0473 RP-2003-0063 – 2004 Rates Case (2003)

RP-2002-0130 / EB-2003 Rates (2003) RP-2002-0130 – 2003 Rates (2002) RP-2000-0117 – Sarnia Regional Cogen Facilities (2001)

National Energy Board

RH-1-2000 RH-3-2004

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Statement of Qualifications Mark D. Kitchen

Experience:	Union Gas Limited
	Manager, Rates and Pricing 2002
	Manager, Product & Service Costing 1999
	Manager, Cost of Service 1997
	Supervisor, Gas Supply Planning 1996
	Supervisor, Contract Forecasts 1993
	AXA Insurance
	Senior Systems Applications Analyst 1992
	Siemens Automotive Ltd.
	Senior Product Cost Analyst 1990
	Consumers' Gas Company
	Assistant Supervisor, Gas Sales Revenue and Gas Costs 1989
	Conservation Analyst 1987

Education:	Master of Arts, Economics
	University of Waterloo, 1987

Bachelor of Arts, Economics/Russian University of Waterloo, 1985

Appearances: (New York State Public Service Commission)

Case 01-G-1406

(Ontario Energy Board) EB-2005-0473 EB-2004-0542 RP-2003-0063 RP-2002-0130/EB-2003-0056 RP-2002-0130 E.B.R.O. 499 RP-1999-0017 RP-2001-0029

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Statement of Qualifications Libby Passmore

Experience:	Union Gas Limited
	Manager, Product and Process Development 2004
	Strategic Manager, Energy Markets 2001
	Manager, Retail Energy Marketers 1998
	Manager, Commercial/Industrial Accounts 1995
	Coordinator, Customer Communications 1993
Education:	Honours in Bachelor of Commerce Queens University,
Appearances:	(Ontario Energy Board) None

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Statement of Qualifications Steve Poredos

Experience:	Union Gas Limited
	Director, Capacity Management 2002
	Manager, Asset Yield 1999
	Manager, Integrated Supply and Transportation Planning 1997
	Manager, Marketing and Sales, Power Generation Sectors 1995
	Manager, Marketing and Sales, Automotive and Power Generation Sectors 1994
	Manager, Cogeneration Sales 1992
	Sales Manager, Chatham Division 1991
	Manager, Natural Gas Vehicles (NGV) Operations 1986
	Natural Gas Vehicles (NGV) Stations Engineer 1985
	Planning Engineer, Gas Supply 1982
	Assistant to the Planning Engineer, Gas Supply 1980

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Education:Bachelor of Applied Sciences, Civil Engineering
University of Waterloo, 1980Bachelor of Commerce
University of Windsor, 1992Appearances:(Ontario Energy Board)
RP-2003-0063
RP-2002-0130
E.B.R.O. 499
E.B.R.O. 470
E.B.L.O. 209

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Statement of Qualifications Christopher R. Shorts

Experience:	Union Gas Limited
	Manager, Ontario Power Markets 1999
	Commercial Manager Steel and Power Markets 1997
	Manager, Industrial Gas Delivery Services 1994
	Administrator, Direct Purchase 1990
	Coordinator, Direct Purchase 1988
	Regulatory Accounting Analyst 1986
	Canadian Imperial Bank of Commerce
	Administration Officer 1984
Education:	Honours, Bachelor of Commerce University of Windsor, 1984
Appearances:	(Ontario Energy Board)
	EBRO 493/494 EBRO 486 EB40 476 (DP)

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Statement of Qualifications Michael Broeders

Experience:	Union Gas Limited
	Manager, Product & Services Costing 2004
	Manager, Financial Reporting 2002-2004
	Team Lead, Finance 1999-2002
	Coordinator, Financial Reporting 1997-1999
	Internal Auditor 1996
	Coopers & Lybrand (now PriceWaterhouseCoopers) Associate 1993-1995
Education:	Chartered Accountant 1995
	Bachelor of Math, University of Waterloo 1992
Memberships:	Canadian Institute of Chartered Accountants Institute of Chartered Accountants of Ontario
Appearances:	(Ontario Energy Board) EB-2004-0542 RP-2003-0063
	State of New York State Public Service Commission, Case 01-G-1406, Proceeding on Motion of the Commission to Review Tariff Filing of Empire State Pipeline to Recover Deferred and Permanent Increase in Taxes

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Statement of Qualifications Drew Quigley

Experience: Union Gas Limited Manager, Integrated Gas Supply Planning 2005 Risk Specialist, Capacity Management and Utilization 2000-2005 **London Reinsurance Group** Manager, Corporate Development 1999-2000 Controller 1994-1999 Accounting Specialist 1992-1994 **London Life Insurance Company** Senior Financial Analyst 1989-1992 **Canada Trust Corporate Auditor** 1987-1989 **National Trust Branch Auditor** 1986-1987 **Clarkson Gordon Chartered Accountants (now Ernst &** Young) Senior Staff Accountant

1985-1986

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Staff Accountant 1984-1985

Education:	Certified Management Accountant 1991
	Bachelor of Arts (Economics), University of Western Ontario 1982
Memberships:	Society of Management Accountants of Ontario
Appearances:	(Ontario Energy Board) None

Exhibit B, Tab 1 UGL Undertaking 43a Page 1 of 2

UNION GAS LIMITED

Undertaking of Steve Poredos <u>To Mr. Quinn</u>

To produce base running the sendout model.

Union re-ran the 2007 Rate Case gas supply plan removing the fixed storage constraint for infranchise bundled customers which had been based on the aggregate excess methodology.

As detailed in the response to UGL Undertaking 44, Union uses the current Board approved aggregate excess methodology to allocate physical storage space to its in-franchise customers for load balancing needs. In summary, the current Board approved aggregate excess methodology for physical storage space allocation is the difference between a customer's winter consumption and their average annual consumption over the 151 day winter period. This storage space is typically filled with a customer's summer supply deliveries (DCQ – which equals projected annual demand divided by 365 days) in excess of the customer's summer demands. This provides the storage inventory required to meet normalized winter consumption in excess of winter supply (the DCQ for 151 days).

To complete the requested analysis, storage was allocated at cost based rates with Union providing deliverability and fuel for all bundled customers. These rates were based on the results of the 2007 ADR settlement agreement. All other assumptions and constraints remained unchanged from the 2007 Rate Case gas supply plan (EB-2005-0520, Exhibit D1, Tab1, Page 3). The resultant outcome was compared to the 2007 Rate Case gas supply plan.

The results comparing the 2007 Rate Case test year with the Undertaking were as follows:

	2007 Rate Case Filing	Undertaking 43A
Storage Space - November 1, 2006 (TJ's)	68,025	70,700
2007 Unutilized Capacity (UDC) - volume (TJ's)	4,657	6,141

Over the term of the five year plan the cumulative difference in total costs to the transportation and commodity portfolio was approximately 0.15%.

Witness:Steve PoredosQuestion:May 19, 2006Answer:June 16, 2006Docket:EB-2005-0551

Exhibit B, Tab 1 UGL Undertaking 43a Page 2 of 2

Total unutilized pipe capacity remained unchanged over the five year term of the plan from the five year 2007 Rate Case plan.

Witness:Steve PoredosQuestion:May 19, 2006Answer:June 16, 2006Docket:EB-2005-0551

Exhibit B, Tab 1 UGL Undertaking 43b

UNION GAS LIMITED

Undertaking of Steve Poredos <u>To Mr. Quinn</u>

To produce base running the sendout model / weather plus or minus 4 percent over and under normal.

Union reviewed its weather sensitive sales service demands for the 2007 Rate Case test year from the Board approved demand forecast and adjusted them by +/-4%. With the supply plan asset mix set as per the results of Undertaking 43A, Union determined the impact of these weather variations.

An increase in the 2007 calendar year weather sensitive demands of 4% relative to the 2007 test year forecast resulted in a decrease in unutilized pipe capacity for 2007 of 2,748 TJ's and generated a spot gas purchase requirement of 1,022 TJ's.

A decrease in the 2007 calendar year weather sensitive demands of 4% relative to the 2007 test year forecast resulted in an increase in unutilized pipe capacity for 2007 of 3,063 TJ's.

Witness:Steve PoredosQuestion:May 19, 2006Answer:June 16, 2006Docket:EB-2005-0551

EB-2005-0551 Exhibit A Tab 3 <u>Page 1 of 8</u> Supplemental

1	SUPPLEMENTAL PREFILED EVIDENCE OF
2	UNION GAS LIMITED
3	NATURAL GAS ELECTRICITY INTERFACE REVIEW
4	POWER SERVICES EVIDENCE
5	
6	The following supplemental evidence is related to the in-franchise services section found
7	under Tab 3 of Union's EB-2005-0551 Power Services evidence filed on March 20,
8	2006.
9	
10	Overview
11	Union Gas has worked with existing and prospective natural gas power generators and
12	affected stakeholders through the rapidly evolving natural gas power generation
13	marketplace in Ontario. These generators include the first open market participants
14	("early movers") that located plants in the Sarnia and Windsor areas. These were
15	followed by generators involved in the Clean Energy Supply ("CES") Request for
16	Proposal ("RFP")/contracting process of 2004 and 2005, and then with the next wave of
17	market participants awaiting the West Greater Toronto Area ("West GTA") RFP.
18	
19	Throughout this period, and in preparation for this proceeding, Union has adhered to a
20	number of underlying principles that support the service offerings to these customers.
21	These guiding principles include:

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1	1) Services continue to be evolved or are developed with an adherence to the
2	principles of postage stamp rate-making. This approach is consistent with the
3	Board's expectation as set out in its RP-2005-0022 / EB-2005-0411 Decision
4	where the Board stated that it;
5	"continues to support the principle of postage stamp rates"
6	2) New services will not negatively impact the service to existing customers, where
7	negative impact is defined as either additional significant financial burden to other
8	customers or a reduction in the overall system capability and reliability.
9	3) Where possible, to respond to a customer's request for flexibility in the terms and
10	conditions of service in order to best serve their natural gas needs.
11	
12	Immediately following the conclusion of the NGEIR Technical Conference on April 6,
13	2006, Union received a written request from a potential power generation customer who
14	is planning to respond to the anticipated West GTA RFP. The request centered around
15	Union's existing T1 service, including concern about the daily delivery obligations
16	associated with the existing T1 service.
17	
18	These potential new, large T1 power generation customers who are expressing a renewed
19	interest in being located at the extreme eastern end of Union's Dawn-Parkway
20	transmission system are significantly larger than any of the existing in-franchise T1 loads
21	Union has served by the Dawn-Parkway transmission system. In addition, their firm load
22	factors of approximately 50% are materially different than the existing T1 rate class

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1	average of approximately 80%. Also, the absolute size of the peak day demand (100,000
2	to 120,000 GJ/d) is unparalleled by any single large industrial customer currently served
3	by the Dawn-Parkway transmission system. The largest contract customer currently
4	served by the Dawn-Parkway transmission system has a peak day demand (also known as
5	the firm Contract Demand or CD) of approximately 50,000 GJ/d, about half the
6	magnitude of that required by a 500 MW power generation plant.
7	
8	The recent customer request, in combination with the potential for a concentration of
9	new large T1 power generation customers requesting service very near the east end of the
10	Dawn-Parkway transmission system, has caused Union to undertake a review of the
11	terms and conditions of the T1 service. This review has encompassed daily delivery
12	obligations, Dawn-Parkway transmission requirements, storage allocation methodology
13	and deliverability requirements.
14	
15	T-1 Customers currently served by the Dawn-Parkway transmission system
16	A new T1 customer served by the Dawn-Parkway transmission system, under existing
17	contracting practices, is required to deliver to Union's system a daily obligated volume
18	equal to 1/365 th of their total annual forecasted demand. This daily obligated volume is
19	delivered at the east end of Union's transmission system (i.e., at Parkway). The
20	difference between this daily obligated volume (Daily Contract Quantity or DCQ) and
21	firm daily peak demand (firm Contract Demand or CD) is incorporated into Union's
22	system design. Union either constructs incremental Dawn to Parkway transmission

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1	capacity, or makes alternate arrangements, to serve this peak day firm requirement.
2	These costs are then rolled in with existing system costs and allocated to the appropriate
3	rate classes. Union has been able to utilize this practice in the past as a result of the wide
4	diversity in size and location of the moderate, predictable demand growth on its
5	integrated system.
6	
7	Changed Environment
8	As mentioned above, the sheer size of the potential new T1 demands, in combination
9	with their relatively low load factors, is not reflected or considered in Union's current
10	contracting practices or system operation for customers east of Dawn.
11	
12	For example:
13	A 500 MW power generation plant, with a peak hourly demand of 4,000 - 5,000 GJ/hr,
14	would create a peak day demand (CD) of approximately 100,000 GJ/d.
15	Assuming an annual load factor of approximately 50%, the customer's obligated DCQ at
16	Parkway would be 50,000 GJ/d. The difference between the obligated DCQ at Parkway
17	(average daily delivery) and the CD (peak day firm requirement) creates a substantial
18	requirement (50,000 GJ/d) for either incremental Dawn to Parkway transmission capacity
19	or for alternate arrangements to serve the peak day requirements that are not met by the
20	obligated DCQ at Parkway. Absent any change to the existing terms and conditions, the
21	impact of rolling these incremental costs in with the existing system costs could create a
22	significant cost burden for all existing customers. In this example, a 50,000 GJ/d demand

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1	represents a significant amount of Dawn-Parkway capacity expansion which has a value
2	of \$1.5 to \$2.0 million per year at posted M12 tolls. In the absence of any changes, this
3	amount would be recovered from other existing customers.
4	
5	Customers Alternatives
6	Union is amending the terms and conditions of T1 service for new, large firm T1
7	customers, and for existing customers with new firm incremental loads, of greater than
8	1,126,964 m ³ per day served by the Dawn-Parkway transmission system. This threshold
9	aligns with the proposed new T1 rate class structure which was described at Tab 3, pages
10	17 – 28.
11	
12	Specifically, Union is offering the following alternatives and options for customers:
13	1) Customers could deliver a daily obligated supply at Parkway, equal to 100% of
14	their firm CD, which avoids the need for Union to construct incremental Dawn-
15	Parkway transmission capacity (or make alternate delivery arrangements), or
16	2) Customers could commit to M12 Dawn-Parkway transmission capacity sufficient
17	to meet 100% of their firm CD. This allows the customer to purchase all their gas
18	supply at Dawn, on a non-obligated basis, yet operate with the no-notice benefits
19	of the T-1 service, or
20	3) Customers could elect to deliver their DCQ at Parkway on the days/hours their
21	plant is consuming. This election would require the customer to match the hourly
22	(or in increments of 15 minutes) deliveries from TCPL at Parkway to the same

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1	hourly or 15 minute increment consumption at the plant (this option would be
2	contingent on TCPL being able to confirm physical supply to Union at Parkway
3	on hourly or 15 minute increments). Union would only redeliver to the customer
4	what had been delivered to Union by the customer, or
5	4) Any combination of the above that meets the requirements. In the above example,
6	the customer could choose to obligate daily deliveries at Parkway (DCQ) for
7	40,000 GJ/d, and commit to incremental Dawn-Parkway transmission capacity of
8	60,000 GJ/d, to meet their firm CD.
9	
10	Under alternatives 2 and 4, the customer would be required to assign the right to use the
11	M12 Dawn-Parkway transmission capacity to Union to allow Union to manage the firm
12	redeliveries to the plant on a no-notice basis. The customer would continue to pay for
13	M12 demand charges as well as the required M12 fuel (based on actual daily usage up to
14	the total contracted volume of M12 capacity).
15	
16	These alternatives allow new large customers east of Dawn to use T1 service without
17	imposing a significant cost burden on other customers. They also provide the service
18	flexibility being requested by the new Power Customers for a non-obligated DCQ.
19	
20	Allocation of Storage to new large Power Customers
21	To determine the capacity used by customers for Union's storage services, Union
22	allocates storage space in accordance with the Board approved aggregate excess

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1	methodology. This methodology is described at page 7 of Union's storage regulation pre-
2	filed evidence. The aggregate excess methodology applies to customers who commit to a
3	daily delivery obligation. For traditional "semi unbundled" T-1 customers, with an
4	obligated DCQ, Union allocates cost-based storage using the aggregate excess
5	calculation. This methodology recognizes the differences between seasonal load profiles,
6	annual supply requirements and subsequent daily delivery obligations.
7	
8	For customers who do not want to commit to daily deliveries (i.e. no obligated DCQ), the
9	aggregate excess allocation methodology will not apply. These customers would have no
10	seasonal or annual balancing requirement. Accordingly, these customers will not receive
11	a traditional allocation of storage space as there are no differences in seasonal load
12	profiles, annual supply requirements and daily delivery obligations.
13	
14	Power Customers have expressly told Union that their storage and balancing needs are
15	driven by their daily deliverability requirements and not by the amount of allocated
16	storage space. Union is currently evaluating options to provide a storage service to
17	power generators who wish to avoid daily delivery obligations, and will bring these
18	forward in due course for Board approval.
19	
20	Conclusion
21	By incorporating these proposed changes, large in-franchise power generation customers

22 will continue to have access to the no notice T-1 service, while ensuring that the existing

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- 1 customer base is not exposed to significant additional costs and preserving the concept of
- 2 postage stamp rates for all T-1 customers.