

APPENDIX "A"

Exhibit J5.87

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UNION GAS LIMITED

Answer to Interrogatory
from the City of Kitchener

Reference: Issue H.5.6

Question

- a) Please provide a table showing the amounts of storage deliverability historically underpinning service at EBRO 494, EBRO 499 and since EBRO 499
 - i) To the City of Kitchener
 - ii) To rates M-2, M-4, M-9, M-7 and T-3
- b) What was Union's proposed level of storage deliverability for contract unbundled customers in RP-1999-0017? (U-2, U-7, and U-9)
- c) Please describe how SPS contributes to the deliverability of U-2. Please include in your explanation the allocations and deliverabilities attached to SSS and SPS.
- d) Please also provide a table showing the storage space historically underpinning service to the City of Kitchener at and since EBRO 494.

Answer

- a) The tables as requested are attached below:
 - i)

	EBRO 494	EBRO 499	RP-2003-0063
	Level of Deliverability		
CCK	1.84% *	1.69% *	1.50%

* CCK included in Rate M9 Class

- ii)

Rate Class	EBRO 494	EBRO 499	RP-2003-0063
	Level of Deliverability		
M2	2.49%	2.36%	2.18%
M4	3.01%	1.87%	2.50%
M9	1.84%	1.69%	1.71%
M7	0.08%	0.92%	2.52%
T3			1.50%

Witness: Mark Kitchen / Pat McMahon
 Question: July 24, 2003
 Answer: August 13, 2003
 Docket: RP-2003-0063

- b) The approved Standard Storage Service (SSS) available to all unbundled rate classes includes storage deliverability of 1.2% for inventory levels greater than or equal to 20% of the allocated space.

The approved Standard Peaking Service (SPS) available to U2 customers only, includes storage deliverability of 10%.

The methodology and assumptions relating to the Standard Storage Service (SSS) and Standard Peaking Service (SPS) were discussed in RP-1999-0017, Exhibit B, Tab 1, page 55 to 60 (Attachment #1). Further discussion and amendments to Union's position related to SSS and SPS appear in RP-1999-0017 Decision with Reasons, Appendix D, pages 22 to 25 (Attachment #2). Union also provided evidence related to the rate design of the SSS and SPS at RP-1999-0017, Exhibit B, Tab 4, pages 16 to 18 (Attachment #3). The Board approved the rate design as proposed by Union in its RP-1999-0017 Decision at para. 3.35 (Attachment #4).

- c) Please see part (b) above.

d)

	EBRO 494	EBRO 499	RP-2003-0063
	Storage Space (10 ³ m ³)		
CCK	69,000 (1)	75,922 (2)	89,300 (3)

Notes:

- (1) Estimated.
- (2) RP-1999-0017, Exhibit C19.15, Issue 1.3.3, Page 2 of 2, Line 5 (Attachment #5).
- (3) As per their T3 contract.

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