SHELL ENERGY INTERROGATORY #1

INTERROGATORY

Reference: Exhibit C-1-8, par.6

The evidence states that EGD relies on direct shippers to meet up to 15% of peak demand requirements.

i. What are the EGD practices for meeting peak day requirements for the needs of all customers and how does this differ from system gas customers. For each of direct purchase customers and system gas customers, please provide information on the source .of gas to meet peak demand, delivery points used on the EGD system to meet peak day demand and type of service contracted for.

ii. Please clarify how EGD practices differ between meeting peak day requirements versus the demand throughout the rest of the year.

RESPONSE

i. EGD meets the peak day requirements of direct purchase customers over and above their daily deliveries. EGD meets the entire peak day requirements of system gas customers. Peak day demand is met by using all the contracted and available supplies which include system firm transportation contracted from TCPL (7%), direct shipper gas (15%), Dawn delivered supplies including Vector transport and storage gas (65%), and peaking (7%) and curtailment supplies (5%). Dawn delivered gas serves CDA and EDA using a combination of firm short-haul contracts with TCPL, STS contracts and direct Parkway flows into the distribution system. Daily requirements depend principally on weather conditions and EGD may use portions of the supply segments used for peak day demand, except peaking and curtailment supplies, on most days. On an average day, EGD system customers' TCPL firm transport makes up about 15%, direct shipper supply over 45%, short-haul transport 21% and storage gas 17%. For both peak day and average day requirements, system firm transportation is used at 100% load factor.

   EGD uses the two delivery areas, CDA and EDA, as an integrated system, and provides load balancing for all customers whether system or direct purchase.

   Please also see the response to BP Canada Interrogatory #11 at Exhibit I, Tab 10, Schedule 11, which shows how actual peak day demand was met in 2008.

Witnesses: M. Giridhar
K. Irani

ii. On average days, EGD does not change the practice of providing load balancing to all distribution customers. Also, as during peak conditions EGD utilizes long-haul transport at 100% on average demand days. As shown above in part i, the composition of supplies and transport may change on average days and, depending on weather and demand conditions, peaking supplies and curtailment may not be required.

SHELL ENERGY INTERROGATORY #2

INTERROGATORY

Reference: Exhibit C-1-8, par.7

The evidence states that as of November 1, 2007 daily deliveries from direct shippers to the EGD franchise equaled 520,937 Gj/d. Please provide the total daily deliveries from direct shippers to EGD franchise area up to November 1, 2008 and provide the following breakdown:

i. What is the total daily capacity of TCPL to the EGD franchise area?

ii. How much TCPL FT (Gj/d) does EGD have under contract?

iii. What supply and transportation arrangements does EGD use to supply the remainder of its demand and specify if at any time over the last five years, EGD was not successful in securing such supply?

iv. Please indicate what contractual commitments, or otherwise, EGD requires when it purchases a firm delivery obligation. Does EGD require contracting parties who have firm delivery obligations to back up these obligations with firm transportation?

RESPONSE

Please see response to BP Canada Interrogatory #10 at Exhibit I, Tab 10, Schedule 10. The following table shows long and short haul firm transportation capacity to EGD's franchise and identifies the transportation capacity for EGD, direct shippers and power generators.

TCPL Firm Transportation Capacity
November-08

	Gj/d
EGD FT	445,227
Direct shippers	57,510
Direct Shippers - power generators	260,000
Total FT to EGD CDA & EDA	762,737

Source: TCPL Nov 1, 2008 Index of Customers

Witnesses: M. Giridhar
K. Irani

i. EGD is unaware that TCPL reserves capacity to EGD's franchise area other than capacity that is offered in TCPL's open seasons by segment to the Central and Eastern Delivery Areas which include deliveries to Union, Cornwall.

ii. Please see the response to Direct Energy Interrogatory #2 at Exhibit I, Tab 9, Schedule 2.

iii. Please see response to Shell Energy Interrogatory #1 at Exhibit I, Tab 12, Schedule 1. EGD did meet peak day demand for the last five years, as planned.

iv. In the fall of 2008, EGD instituted a review of language pertaining to failure to perform in its peaking supply contracts. As of 2009, EGD will ensure that all peaking contracts use the "cover standard" as opposed to "spot standard" as remedy for failure to perform. While EGD does not propose that peaking contracts require demonstration of firm transport to the franchise, its experience with peaking supplies in January of this year will result in a review of the amount of peaking supply in its portfolio. Please see response to BP Canada Interrogatory #5 at Exhibit I, Tab 10, Schedule 5.

Witnesses: M. Giridhar
K. Irani

SHELL ENERGY INTERROGATORY #3

INTERROGATORY

Reference: Exhibit C-1-8, par.8

EGD states that it relies on curtailment of its interruptible customers under peak demand conditions. Please indicate, over the last five years, the volumes of gas supply that are subject to curtailment, the corresponding volume of gas supply that has actually been curtailed and the circumstances that caused the curtailment.

RESPONSE

Curtailment by EGD in the years 2005 to 2008 is set out below. To EGD's knowledge all the curtailment was done to meet weather related demand.

Year 2005	Maximum Potential Curtailment Possible (GJs)	Actual Curtailment (GJs)	UOG (GJs)	Net Curtailment (Actual-UOG) (GJs)
CDA Rate 145/170	701,030	596,215	10,583	585,631
EDA Rate 145/170	502,533	486,527	3,243	483,285

Year 2006	Maximum Potential Curtailment Possible (GJs)	Actual Curtailment (GJs)	UOG (GJs)	Net Curtailment (Actual-UOG) (GJs)
CDA Rate 145/170	NA	0	0	0
EDA Rate 145/170	115,978	95,452	3,477	91,975

Year 2007	Maximum Potential Curtailment Possible (GJs)	Actual Curtailment (GJs)	UOG (GJs)	Net Curtailment (Actual-UOG) (GJs)
CDA Rate 145/170	304,393	304,393	18,201	286,192
EDA Rate 145/170	514,727	514,727	1,223	513,504

Witnesses: M. Giridhar
K. Irani

Year 2008	Maximum Potential Curtailment Possible (GJs)	Actual Curtailment (GJs)	UOG (GJs)	Net Curtailment (Actual-UOG) (GJs)
CDA Rate 145/170	445,710.6	445,710.6	6,288.8	439,421.8
EDA Rate 145/170	254,167.6	254,167.6	1,637.4	252,530.2

Witnesses: M. Giridhar
K. Irani

SHELL ENERGY INTERROGATORY #4

INTERROGATORY

Reference: Exhibit C-1-8, par.7

EGD's analysis of the TCPL Index of Customers indicates that approximately 457,000 Gj/d of gas delivered to the EGD franchise is via IT arrangements or through diversions of gas on firm contracts to other delivery areas. Please clarify what percentage volume of the 457,000 Gj/d of gas delivered under non-firm arrangements should be backed up by TCPL FT if EGD is successful in its current application before the Board with respect to firm upstream transportation

RESPONSE

Please see Exhibit C, Tab 1, Schedule 10, paragraph 28.

Witnesses: M. Giridhar
K. Irani

SHELL ENERGY INTERROGATORY #5

INTERROGATORY

Reference: Exhibit C-1-8, par.9

EGD acknowledges that the probability of supply shortfall resulting from curtailment of non firm services by TCPL is "low".

i. What is EGD's best estimate of that probability on a percentage basis?

ii. Please indicate whether EGD has conducted any research or communicated with TCPL or other parties in an effort to quantify or otherwise measure the probability of supply shortfall and provide evidence of same.

iii. Please provide all studies, reports, correspondence and communications that EGD has prepared or participated in that addressed or discussed the issue of the likelihood of a supply shortfall resulting from the lack of FT contracts for direct purchase customers.

RESPONSE

i. Please see the responses to IGUA Interrogatory #12 at Exhibit I, Tab 11, Schedule 12 and CCC Interrogatory #15 at Exhibit I, Tab 8, Schedule 15.

ii. Please see i. above. EGD has not consulted with TCPL or other parties to quantify or otherwise measure the probability or probabilities.

iii. Please see attached presentation to EGD’s executive team (Attachment 1) and related correspondence. EGD also made a presentation at a stakeholder conference. This presentation has not been attached because all parties agreed that the discussion at the stakeholder conference was to remain confidential.

Witnesses: M. Giridhar
K. Irani

Firm Transport requirement for direct purchase customers

EMT presentation
Sep 15, 2008

Malini Giridhar

Issue – Risk of Supply failure

- Ontario T service customers deliver gas to EGD city gate;
- EGD Tariff does not require Ontario T service customers who take firm distribution service to deliver gas under firm upstream transport service
- A significant portion of Ontario T service volumes to the CDA utilize non firm services on TCPL
- TCPL does not build or maintain facilities for non firm services
- TCPL system conditions could require curtailment of non firm volumes
- The resulting supply shortfall could cause curtailment of EGD's firm customers and force majeure on EGD system

Other jurisdictions

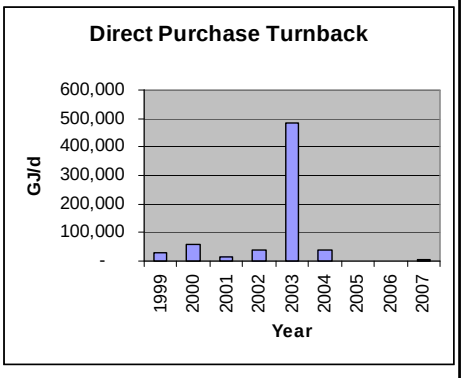
- EGD commissioned a survey of other North American jurisdictions*
  - 70% of 41 utilities surveyed required direct purchase customers on firm distribution service to either:
    - Take an assignment of utility upstream capacity ,or,
    - Demonstrate firm upstream transport arrangement, or,
    - Subscribe to utility firm standby service
  - 15% of utilities had tariff provisions allowing for curtailment of customers who fail to deliver
    - Only possible for large volume customers
- Union Gas's tariff requires firm distribution customers to have upstream firm transportation arrangements but does not police it.
- Gaz Met customers take an assignment of LDC's upstream capacity
- EGD customers who fail to deliver pay 150% of the price of gas on the day
  - Penalty is levied on an incident basis and flows mostly to ratepayers to offset cost of incremental supply
  - If incremental supply is unavailable, cost of system failure would be borne by EGD

* E. Overcast, Enterprise Management Solutions Black & Veatch

ENBRIDGE

TCPL FT Turnback – Direct Purchase 1999 - 2007

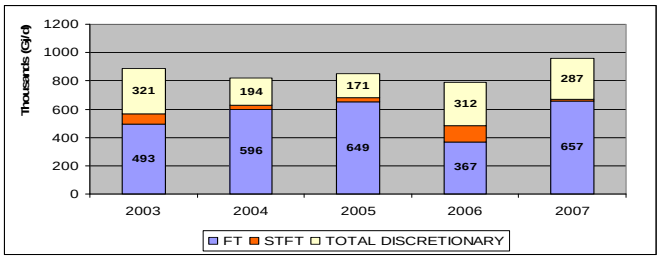
- EGD has facilitated turnback of TCPL capacity since 1999
- Largest turnback happened in 2003
- Most of the turnback has occurred in the CDA
- Turnback of FT capacity partially replaced with non firm "discretionary" TCPL services



ENBRIDGE

TCPL Daily Deliveries* by Service Type

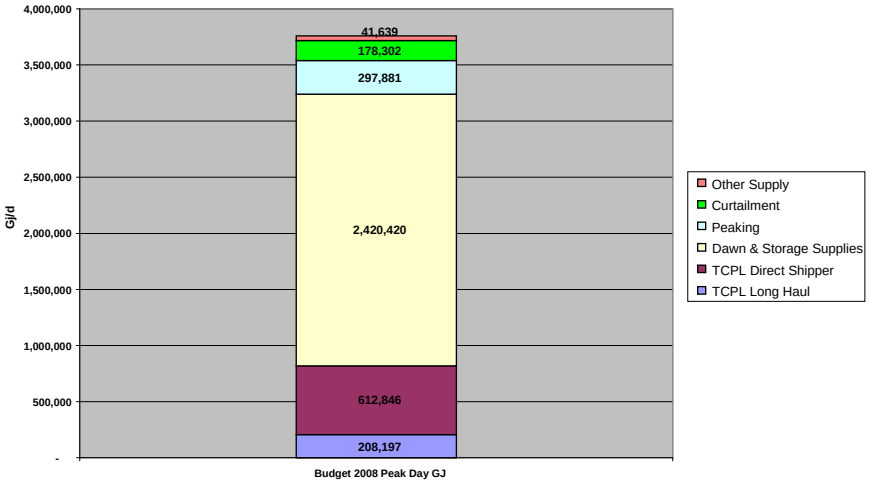
- Includes utility long and short haul and direct purchase FT to CDA and EDA
- Most non firm deliveries occur in CDA
- Size of potential supply shortfall (Discretionary) varies from 170K GJ in 2005 to 320K GJ in 2003
- May trigger equivalent curtailment of firm customers to maintain system pressures



*Analysis of Nov used as proxy for whole year

ENBRIDGE

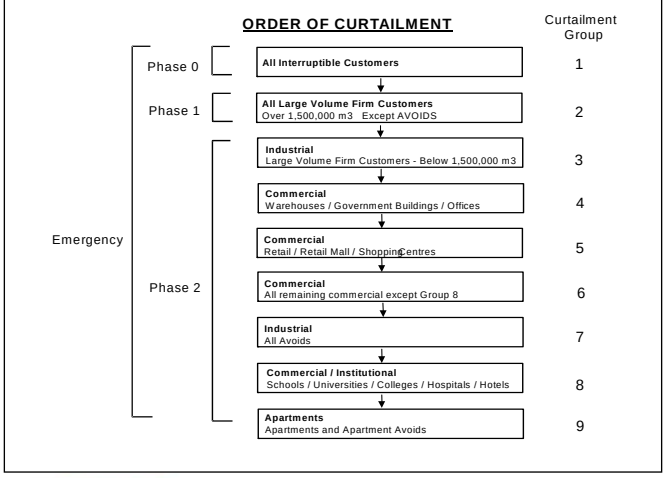
EGD 2008 Peak Day Supply-Demand Balance (Gj/d)



Since interruptible customers are curtailed on peak day, further supply shortfall could trigger curtailment of firm customers

ENBRIDGE

Emergency Procedures Manual - Curtailment



Phase 1: Approx. 204 customers
Total: 269,000 Gj/d

Phase 2: Approx: 882 customers
Total: 227,000 Gj/d

Addressing supply failure of 300,000 GJ could require contact with upto 1000 customers, if some firm LV customers also use non firm deliveries

ENBRIDGE

Risk Assessment

- Financial benefits from non firm upstream transport accrues to intermediaries such as marketers and some direct purchase customers, while risk of supply failure is borne by all customers and EGD shareholder
- Value at risk to EGD shareholder = cost of mitigating supply failure * probability of event
- Cost can range from cost of acquiring incremental supply to cost of addressing loss of system pressure
- Loss of 100,000 customers could take weeks to restore @ $10-12M in direct costs
- Probability of event likely to increase in the future

Continued long haul decontracting on TCPL has increased availability of long haul IT services to CDA

Decontracting impacts future facilities build and maintenance

Power generation load growth may increase congestion in the CDA in the future

ENBRIDGE

Recommendation

1. Institute tariff requirement - all direct purchase customers requiring firm distribution service must demonstrate firm upstream arrangements
2. Cost of monitoring compliance must be recoverable in rates
3. File evidence by Sep 30th as part of 2009 Rate Adjustment Application
4. Initiate consultative process with stakeholders.
5. Seek OEB approval through the rate process if consultations fail
6. Implement requirement for Nov 1, 2009

ENBRIDGE

Keith Irani/GAS/Enbridge
03/04/2008 04:24 PM

To Malini Giridhar/GAS/Enbridge@Enbridge
cc
bcc
Subject Direct Purchase Agreements.

I have attached a copy of the current agreement (customer_gas_delivery_agreement) and the old GTA agreement for reference on EGD's FT requirements. Reading through the documents it is interesting to note that there are no references to TCPL in the new agreement and may have been the reason for the removal of reference to FT transportation. If this decision was made from the consultative process then the ABM market was able to bypass a key requirement in requiring contracting for FT long or short-haul. I also wonder why we would agree to this at the time unless there was contemplation on moving to the vertical slice concept. Having said that Union Gas with their vertical slice for direct purchase still requires their direct purchases to underpin their deliveries with firm upstream transportation. I like the approach where put this requirement in the Handbook and not in the Agreement.


customer_gas_delivery_agreement_blackline.pdf


GTA(OLD).doc

Keith
416 495-5960

"Steve Emond"
<steve_emond@transcanada.com>
03/19/2008 11:10 AM

To "Malini Giridhar" <Malini.Giridhar@enbridge.com>
cc "Don Bell" <don_bell@transcanada.com>, "Lisa DeAbreu" <lisa_deabreu@transcanada.com>, "Doug Miller" <doug_miller@transcanada.com>, "Ken Schubert"
bcc
Subject RE: Information request

History: This message has been replied to and forwarded.

Malini,

Attached is the requested contract information.....Firm contracts to the CDA and EDA as of November 1....for each of the last 5 years. This includes both long-term firm (FT, STS) and short term (STFT). Hope this is what you are looking for. If you need additional information please do not hesitate to call (403) 920-5979.

Thanks!
Steve

P.S. Also attached is TransCanada's submission to the NAESB sub-committee working on nominations and scheduling timelines. Kent already has a copy of this. If EGD has any comments or questions, we'd be happy to discuss.

From: Malini Giridhar [mailto:Malini.Giridhar@enbridge.com]
Sent: Tuesday, February 26, 2008 10:22 AM
To: Steve Emond; Don Bell
Subject: Information request

Don and Steve,

I wanted to follow up internally on the issue of marketers and customers using discretionary transport to bring their daily volumes into the franchise area. One option is to propose a tariff change to require direct shipper customers seeking firm distribution service to show that their upstream transport arrangement is firm and matches their mean daily volumes (annual contract volume/365). It would be useful for me to get some perspective on the extent and duration of this problem, before I raise an outcry from marketers at the OEB. Would it be possible for someone at TCPL to summarize for me the number of firm contracts to the CDA and EDA (short and long haul) say at November 1 of each of the last 5 years? I could then match this up against our direct shipper numbers for the same periods.

One issue I may have to sort out is what happens if this rule is instituted and customers are unable to get capacity (for e.g EDA) in time for their distribution service. Perhaps this can be discussed when we meet next.

Also, following up on my voice mail to you, I wanted to know if April 2 would work for a meeting in Calgary. I had forgotten that I had a commitment on April 1 that would prevent me from getting to Calgary in time for a meeting on the day.

Regards,

Malini Giridhar

Energy Policy and Analysis
Enbridge Gas Distribution
416 495 5255

NAESB Letter and Presentation-March 2008.pdf

ECDA EEDA Firm Contracts 2003 - 2007.xls

Malini Giridhar /GAS/Enbridge

05/29/2008 12:44 PM

To EP&A Managers, Ian Macpherson/GAS/Enbridge@Enbridge, Bruce Manwaring/GAS/Enbridge@Enbridge, Rob Rowe/GAS/Enbridge@Enbridge, Anton
cc Lucy Wakabayashi, Nizam Ali/GAS/Enbridge@Enbridge, Patrick Hoey/GAS/Enbridge@Enbridge, Jim Grant/GAS/Enbridge@Enbridge
bcc

Subject Requiring firm transport from direct shippers and Union direct shipper rules

Thanks Kent, your note below is interesting. Ian, we should ramp up our internal discussion and strategy on this issue next week. Lucy, could you set up a meeting with all people addressed (optional for people cced) on this note for next week. An hour and a half would work. Please note that at this point the discussion on this issue is still confidential and should not be disclosed to brokers. Some of the issues we need to discuss around requiring direct shippers to show firm transport are:

1) Firm capacity - should it be to a market hub and what is the definition of a market hub or can it between any receipt and CDA/EDA on TCPL system? (i.e. North Bay junction!!?)
2) Do we need shipper to demonstrate firm contract for twelve months or is for winter only.
3) Will we accept firm transport to a delivery point downstream of us ?
4) What consultative process should we follow and with who?
5) Assuming consultative process brings consensus, do we need OEB approval and how should OEB approval be sought? (which proceeding, should it be in the rate handbook?)
6) If consultations fail when would we bring it to the OEB's attention
7) When should this be introduced?

Please feel free to add any relevant issues you can think of.

Malini Giridhar
Energy Policy and Analysis
Enbridge Gas Distribution
416 495 5255

----- Forwarded by Malini Giridhar/GAS/Enbridge on 05/29/2008 12:22 PM -----

Kent Wirth/CNPL/Enbridge@IPL

05/29/2008 11:41 AM

To Malini Giridhar/GAS/Enbridge@Enbridge
cc

Subject Union Direct Ship Rules

Hello,
I've had a brief discussion with Union re: their deregulation rules.

Any Union Gas Direct Ship customers feed from the TCPL system **must** take assignement of Union's TCPL transport or supply their gas @ Empres and
Union will ship on their TCPL's transport. Customers are **not allowed** to turn back capacity.

Direct Ship customers served off the Dawn Trafalger system are required to deliver gas to Union @ either Dawn or Parkway - these customers
have slightly more freedom in how they contract because they get the benefit of being connected to Union's integrarted transmission and storage assets.

Given that we do not allow Direct Ship customers to deliver to the CDA via our interconnect with Union I

see no reason why we can't draw a
parallell to Union's rules regarding TCPL feed customers. Union does not allow turn back - Enbridge does allow turn back to give marketers more flexibility, however with the flexibility comes responsibility. Responsibility that deliveries are firm so as to not put the Enbridge system at undo risk. Recent TCPL capacity open seasons show great demand for short haul transport on the same path as short haul transport to the CDA. This indicates discreationary
services may will be less readily available. If a marketer can not illustrate firm transport into the CDA, EGD will impose a backstopping fee on the
marketer.

Malini Giridhar /GAS/Enbridge
08/11/2008 03:38 PM

To Keith Irani/GAS/Enbridge@Enbridge
cc
bcc
Subject Re: EMT presentation - Direct Shippers.

Keith I would work in some of the numbers and analysis provided by Steve Emond to show the seriousness of the situation.

Malini Giridhar
Energy Policy and Analysis
Enbridge Gas Distribution
416 495 5255

Keith Irani/GAS/Enbridge

Keith Irani /GAS/Enbridge
08/11/2008 03:19 PM

To Malini Giridhar/GAS/Enbridge@Enbridge
cc
Subject EMT presentation - Direct Shippers.

Malini, please see attached draft presentation. I did speak with Anton and as you may know he will be receiving some preliminary information on the US utilities by the end of the week.

[attachment "Direct Shippers EMT Aug 08.ppt" deleted by Malini Giridhar/GAS/Enbridge]

Keith

Keith Irani/GAS/Enbridge
12/11/2008 09:53 AM

To Rob Rowe/GAS/Enbridge@Enbridge
cc
bcc
Subject TC Direct Shippers.

As requested.

TC 2007_Nov_CDE.xls

Keith

REPORTING / CONTRACT DEMAND ENERGY (CDE) REPORT - Mainline

TransCanada
In business to deliver

Export Format: EXCEL
Agreement Type: FT,LTWFS,STS,FST
Report Evaluation Date: 01-November-2007

CONT. NO	SHIPPER	CONTRACT START DATE	CONTRACT END DATE	AGREEMENT TYPE CODE	PRIMARY RECEIPT LOCATION	PRIMARY DELIVERY AREA/POINT	CONTRACT DEMAND (GJ/D)	OPERATIONAL DEMAND (GJ/D)	CD TEMP SHIFTED QTY (GJ/D)	CD TEMP ASSIGNED QTY (GJ/D)
1349	Enbridge Gas Distribution Inc.	1989/11/01	2008/10/31	FT	Empress	Enbridge CDA	0	25,849	0	21,351
29244	Enbridge Gas Distribution Inc.	2006/04/01	2008/10/31	FT	Empress	Enbridge CDA	0	15,000	0	0
27072	IKO Industries Ltd.	2005/11/01	2008/10/31	FT	Empress	Enbridge CDA	1,000	1,000	0	0
27904	IKO Industries Ltd.	2006/03/01	2008/10/31	FT	Empress	Enbridge CDA	1,000	1,000	0	0
11191	Petro-Canada Oil and Gas	1998/11/01	2008/10/31	FT	Empress	Enbridge CDA	5,390	0	0	5,390
25278	PremStar Energy Canada Limited Partnership	2004/10/13	2008/10/31	FT	Empress	Enbridge CDA	1,609	1,609	0	0
25279	PremStar Energy Canada Limited Partnership	2004/10/13	2008/10/31	FT	Empress	Enbridge CDA	2,668	2,668	0	0
25280	PremStar Energy Canada Limited Partnership	2004/10/13	2008/10/31	FT	Empress	Enbridge CDA	8,478	8,478	0	0
6643	Whitby Cogeneration Limited Partnership	1996/11/01	2011/12/31	FT	Empress	Enbridge CDA	11,382	0	0	11,382
20394	Ag Energy Co-operative Ltd.	2003/11/01	2008/10/31	FT	Union Dawn	Enbridge CDA	4,700	4,700	0	0
20395	Canada Starch Operating Company Inc.	2003/11/01	2008/10/31	FT	Union Dawn	Enbridge CDA	4,398	4,398	0	0
20260	Enbridge Gas Distribution Inc.	2003/11/01	2008/10/31	FT	Union Dawn	Enbridge CDA	0	4,818	0	0
20266	Enbridge Gas Distribution Inc.	2003/11/01	2008/10/31	FT	Union Dawn	Enbridge CDA	0	145,000	0	0
20383	Greater Toronto Airports Authority	2003/11/01	2008/10/31	FT	Union Dawn	Enbridge CDA	1,100	1,100	0	0
20581	Integrys Energy Services of Canada Corp.	2003/11/01	2008/10/31	FT	Union Dawn	Enbridge CDA	2,600	2,600	0	0
20224	Oxy Vinyls Canada Inc.	2003/04/01	2008/10/31	FT	Union Dawn	Enbridge CDA	2,079	2,079	0	0
2623	Enbridge Gas Distribution Inc.	1992/11/01	2008/10/31	STS	Union Parkway Belt	Enbridge CDA	0	153,700	0	0
15957	Enbridge Gas Distribution Inc.	2001/11/01	2008/10/31	STS	Union Parkway Belt	Enbridge CDA	0	92,822	0	0
18786	Enbridge Gas Distribution Inc.	2002/11/01	2008/10/31	STS	Union Parkway Belt	Enbridge CDA	0	37,370	0	0
32708	Enbridge Gas Distribution Inc.	2007/05/01	2008/05/31	FT-NR	Union Parkway Belt	Enbridge CDA	0	45,455	0	0
32709	Enserco Energy Inc.	2007/05/01	2008/05/31	FT-NR	Union Parkway Belt	Enbridge CDA	0	45,455	0	0
28958	Goreway Station Partnership	2007/11/01	2008/10/31	FT	Union Parkway Belt	Enbridge CDA	0	0	0	140,000
28756	Greater Toronto Airports Authority	2006/04/01	2018/10/31	FT	Union Parkway Belt	Enbridge CDA	7,500	7,500	0	0
32710	Integrys Energy Services of Canada Corp.	2007/05/01	2008/05/31	FT-NR	Union Parkway Belt	Enbridge CDA	9,091	9,091	0	0
						Enbridge CDA Total	**62,995**	**611,692**	**0**	**178,123**
32625	Carleton University	2007/11/01	2012/10/31	FT	Empress	Enbridge EDA	451	451	0	0
1338	Enbridge Gas Distribution Inc.	1989/11/01	2008/10/31	FT	Empress	Enbridge EDA	32,357	4,310	0	28,047
2172	Enbridge Gas Distribution Inc.	1991/11/01	2008/10/31	FT	Empress	Enbridge EDA	21,584	11,451	0	10,133
5019	Enbridge Gas Distribution Inc.	1994/11/01	2008/10/31	FT	Empress	Enbridge EDA	7,613	7,613	0	0
5445	Enbridge Gas Distribution Inc.	1995/11/01	2010/10/31	FT	Empress	Enbridge EDA	19,692	19,692	0	0
5834	Enbridge Gas Distribution Inc.	1995/11/01	2008/10/31	FT	Empress	Enbridge EDA	10,773	10,773	0	0
6646	Enbridge Gas Distribution Inc.	1996/11/01	2008/10/31	FT	Empress	Enbridge EDA	10,773	10,773	0	0
10862	Enbridge Gas Distribution Inc.	1997/11/01	2008/10/31	FT	Empress	Enbridge EDA	26,952	26,952	0	0
21987	Enbridge Gas Distribution Inc.	2003/11/01	2010/10/31	FT	Union Dawn	Enbridge EDA	114,000	114,000	0	0
1140	Enbridge Gas Distribution Inc.	1989/08/08	2008/10/31	STS	Union Parkway Belt	Enbridge EDA	35,089	35,089	0	0
13307	Enbridge Gas Distribution Inc.	1999/11/01	2008/10/31	STS	Union Parkway Belt	Enbridge EDA	35,806	35,806	0	0
21854	Enbridge Gas Distribution Inc.	2003/11/01	2008/10/31	STS	Union Parkway Belt	Enbridge EDA	9,716	9,716	0	0
						Enbridge EDA Total	**324,806**	**286,626**	**0**	**38,180**

- CONTRACT DEMAND is equal to the current version contract demand plus the CD TEMP SHIFTED QTY in effect.
- OPERATIONAL DEMAND is equal to CONTRACT DEMAND minus CD TEMP SHIFTED QTY and CD TEMP ASSIGNED QUANTITY
- CD TEMP SHIFTED QTY is equal to the Shifts in effect off of the originating FT contract.
- CD TEMP ASSIGNED QUANTITY is equal to the Temporary Assignments in effect off of the originating FT contract.
- 'Permanent Assignments' in effect are shown on the report as new FT contracts for the assignee.
- LTWFS ("Long Term Winter Firm Service") quantity applies to the winter period only (Nov 1 to Mar 31).
- STS ("Storage Transportation Service") quantities and all demand paths are stated for these contracts.
- Only current contract information is included in this report. I.e., no future dated contracts (or amendments) are posted.

SHELL ENERGY INTERROGATORY #6

INTERROGATORY

Reference: Exhibit C-1-8, par.9

EGD states that cost consequences related to shortfall of supply would be borne largely by customers who did not cause the supply shortfall. Please indicate why the costs of the shortfall could not be recovered from those shippers that were unable to deliver supply.

RESPONSE

Please see the response to CCC Interrogatory 14 at Exhibit I, Tab 8, Schedule 14.

Witnesses: M. Giridhar
K. Irani

SHELL ENERGY INTERROGATORY #7

INTERROGATORY

Reference: Exhibit C-1-9, p. 4

The second paragraph of page 4 states that marketers, in the absence of adequate financial incentives, may find it desirable to use FT capacity to delivery gas to other higher priced markets. Please provide evidence of marketers that have used FT capacity to deliver to higher priced markets. Please indicate whether EGD is of the view that current financial incentives are not adequate. Please indicate what financial incentives, in EGD's view, would be adequate to prevent marketers from using FT capacity to service higher priced markets.

RESPONSE

Please see response to Direct Energy Interrogatory #17 at Exhibit I, Tab 9, Schedule 17.

Witnesses: M. Giridhar
K. Irani

SHELL ENERGY INTERROGATORY #8

INTERROGATORY

Reference: Exhibit C-1-10, par.3

The evidence states that a failure to deliver adequate supply to the city gate could result in loss of system pressure and system outages could follow.

i. Please provide details (including date, cause, amount of gas shortage and how the issue was resolved) that resulted in a failure to deliver adequate supplies to the city gate over the past five years.

ii. Given EGD's evidence that failure to deliver adequate supply to the city gate could result in loss of system pressure and system outages, why, in EGD's view, have system outages not already occurred?

iii. For each event listed above, please indicate how FT arrangements would have prevented the event or mitigated the economic harm to EGD's customer base.

RESPONSE

i. Please see response to Board Staff Interrogatory #16 at Exhibit I, Tab 1, Schedule 16

ii. Please see response to Board Staff Interrogatory #16 at Exhibit I, Tab 1, Schedule 16 and response to CCC Interrogatory #15 at Exhibit I, Tab 8, Schedule 15.

iii. While there have not been system outages to date, the risk exists. As indicated in Exhibit C, Tab 1, Schedule 10, Appendix 1, in the event of an impairment of deliveries on TransCanada's Mainline system, interruptible volumes and diversions would be restricted first. If the impairment still exists, FT service along with the other services identified[1] will be curtailed proportionally. As indicated in the labeling of the service, firm transport is more reliable than interruptible transport. Also EGD's peak day supply planning criteria require EGD to hold firm upstream

[1] TransCanada PipeLines Limited Transportation Tariff Terms and Conditions Effective Date February 1, 2009 Sheet No. 26

Witnesses: M. Giridhar
K. Irani

transport and firm storage to meet the most adverse conditions it can reasonably and responsibly plan for. (Please see response to BP Interrogatory #12 at Exhibit I, Tab 10, Schedule 12). With Direct Purchase meeting a portion of peak day demand, it is necessary to ensure that the components of peak day supply are not diluted.

Witnesses: M. Giridhar
K. Irani

SHELL ENERGY INTERROGATORY #9

INTERROGATORY

Reference: Exhibit C-1-10, par.3

The evidence states that gas system outages would expose customers to potential physical harm. Please describe the measures EGD has in place to ensure that its customers are not exposed to potential physical harm when gas shortages occur at the city gate.

RESPONSE

Please see the response to Board Staff #16 b at Exhibit I, Tab 1, Schedule 6 which describes EGD's peak day planning process and a description of the contractual arrangements entered into. EGD has also developed an Emergency Planning process to manage emergency situations including shortfall in gas supply. Please see the response to Shell Energy Interrogatory #5, iii, slide 7 at Exhibit I, Tab 12, Schedule 5.

Witnesses: M. Giridhar
K. Irani

SHELL ENERGY INTERROGATORY #10

INTERROGATORY

Reference: Exhibit C-1-10, par.4

EGD states that a future change in tariff could include instituting a chargeable standby/back stopping services for large volume customers that may require an increase in EGD's FT capacity. Please elaborate on how a chargeable standby/back stopping service would be implemented for large customers and implications to large volume customers (contracting, financial or otherwise).

RESPONSE

Please see the response to BP Canada Interrogatory #6 at Exhibit I, Tab 10, Schedule 6.

Witnesses: M. Giridhar
K. Irani

SHELL ENERGY INTERROGATORY #11

INTERROGATORY

Reference: Exhibit C-1-10, par.6

The evidence states that for the period of January 13th to the 15th, 2009 demand for transportation service on the TCPL mainline exceeded available capacity and that, while all direct shipper gas was ultimately delivered to EGD, a portion of the supplies were only confirmed after the timely nomination window.

i. Please provide the circumstances that led to insufficient capacity on the TCPL mainline during this period.

ii. Please define the time period for the "timely nomination window".

iii. Please list, in the past five years, all other instances in which demand for transportation service on the TCPL mainline exceeded available capacity, by what amount, the duration of the capacity shortage, the cause, and the effect (from an economic and reliability standpoint) on EGD franchise area and how each situation was resolved.

RESPONSE

i. EGD has limited information on the circumstances leading to insufficient capacity on the TCPL mainline. EGD presumes that extreme cold weather in the Prairies and in Central Canada caused mechanical/operational issues that impacted TCPL's ability to deliver nominated gas supply.

ii. The timely nomination window is a North American Energy Standards Board ("NAESB") standard which pipelines (including TransCanada) adhere to, the nomination cycles (also referred to as windows) are as follows[1]:

TransCanada's gas day begins at 09:00 Central Clock Time (CCT). Each gas day has four nomination cycles:

[1] http://www.transcanada.com/Mainline/customer_activities/mainline_nominations_quick_reference_guide.html. Nomination deadlines

Witnesses: M. Giridhar
K. Irani

Timely Cycle - For next day gas flow - at 09:00 CCT
Evening Cycle - For next day gas flow - at 09:00 CCT
Intra-day 1 Cycle - For current day gas flow - at 17:00 CCT
Intra-day 2 Cycle - For current day gas flow - at 21:00 CCT

iii. EGD is unable to provide the requested information as such information is in TCPL's domain. Also, please see the response to Board Staff Interrogatory #16 a. at Exhibit I, Tab 1, Schedule 16.

Witnesses: M. Giridhar
K. Irani

SHELL ENERGY INTERROGATORY #12

INTERROGATORY

Reference: Exhibit C-1-10, par.14

In examining how to meet firm delivery obligations, EGD rejects implementing mandatory assignment of LDC held transport to their agents/marketers on the basis that such a solution would not be implementable by November 1, 2009. Please explain the urgency of having FT delivery obligations in place by November 1, 2009.

RESPONSE

EGD's requirement to demonstrate firm upstream transportation by November 1, 2009 is based on its assessment of potential risk to its system reliability for the upcoming winter.

Witnesses: M. Giridhar
K. Irani

SHELL ENERGY INTERROGATORY #13

INTERROGATORY

Reference: Exhibit C-1-10, par.27

EGD states that, if their application is approved by the Board, the agent/marketer will have the following options to comply with the requirement to demonstrate firm upstream transportation arrangements:

a. Contract for firm transport independently and provide proof of transport with upstream pipeline; or
b. Request an assignment of EGD long haul TCPL capacity, at which point EGD will acquire transport on their behalf.

i. Given that customers who have turned back TCPL FT contracts have taken on other supply arrangements, please advise of the transition period proposed by EGD to unwind these arrangements. Please provide EGD's estimate of the cost of unwinding these arrangements and whether this cost will (ultimately) be borne by the consumer.

RESPONSE

Agents/marketers currently receive T-service credits from EGD equal to the cost of long haul firm TCPL transport to the franchise. EGD presumes that some agents/marketers have turned back upstream transport capacity and substituted it with delivered supply to the franchise from a supplier. Starting November 1, 2009, EGD proposes that agents/marketers be required to procure firm upstream transport to the franchise. EGD presumes that their current arrangements with suppliers can be reworked such that agents assign their firm upstream transport to their supplier and require them to use it to deliver their supplies to the franchise. Please also see the response to Direct Energy Interrogatory #22 at Exhibit I, Tab 9, Schedule 22.

When EGD's new CIS system is implemented, agents/marketers will be able to charge their customers the cost of their firm upstream transport. Since these customers already pay for firm upstream transport, albeit based on EGD's firm upstream portfolio, EGD presumes that their costs will be comparable to what they pay currently.

Witnesses: M. Giridhar
K. Irani

SHELL ENERGY INTERROGATORY #14

INTERROGATORY

Reference: Exhibit C-1-8

With respect to Exhibit C-1-8 generally, please provide the information requested below.

Year	Total EGD gas delivered (Gj)	Total EGD gas delivered under FT arrangements (Gj)	Total annual cost of FT on TCPL pipeline ($CDN)	Total annual cost of IT on TCPL pipeline ($CDN)	Cost of Union M12 plus gas at Dawn ($CDN)
2003					
2004					
2005					
2006					
2007					
2008					

RESPONSE

	Total EGD Gas Delivered - GJ	Total EGD Gas Delivered under TCPL FT Arrangements- GJ	Total Annual Cost of FT on TCPL Pipeline $(000's) - transportation cost only	Total Annual Cost of Long Haul IT on TCPL Pipeline $(000's) - transportation cost only	Cost of Union M12 plus gas at Dawn $(000's)
2003	477,116,021	82,383,859	91,128.6	n/a	449,052.1
2004	458,687,278	36,216,087	31,976.6	n/a	249,416.1
2005	455,166,164	19,071,157	21,099.6	-	544,167.4
2006	420,886,212	12,331,088	11,457.2	-	323,107.9
2007	459,932,569	11,709,737	12,431.3	516.0	462,655.6
2008	456,120,691	24,884,003	32,198.9	420.0	525,684.2

Witnesses: M. Giridhar
K. Irani