



450 - 1st Street S.W.
Calgary, Alberta T2P 5H1

Direct Phone: 403.920.6253
Email: nadine_berge@transcanada.com

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Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Attention: Ms. Kirsten Walli
Board Secretary

Dear Ms. Walli:

**Re: Enbridge Gas Distribution 2009 Rates – Phase 2
Ontario Energy Board (“Board”)
File No. EB-2008-0219
Interrogatories to Direct Energy Marketing Limited of TransCanada PipeLines Limited**

In accordance with the requirements in Procedural Order No. 6, please find attached two hard copies of TransCanada’s Interrogatories to Direct Energy Marketing Limited.

Yours truly,
TransCanada PipeLines Limited

Original Signed by:

Nadine Berge
Senior Legal Counsel
Law and Regulatory Research

TransCanada PipeLines Limited. (“TransCanada”)

Enbridge Gas Distribution Inc.

2009 Rates Application

EB-2008-0219

Information Request to Direct Energy Marketing Limited (“DEML”)

Question 1:

Reference: DEML Written Evidence, Exhibit L, Tab 7, Page 5

Preamble: DEML states “When the new CIS system is functional, Marketers will be able to differentiate themselves based on transportation costs, which will allow Marketers to compete on another part of the EGD bill and should lead to market efficiencies for Ontario natural gas consumers.”
TransCanada wishes to better understand the effect that Enbridge’s new CIS will have on Ontario natural gas consumers.

Request:

- a) Please confirm that marketers currently have control over the Gas Supply Charge EGD includes on its bills to customers who have agreed to purchase their gas supply from marketers.
- b) Please explain how marketer control over the price for transportation services included on EGD’s bill to customers will lead to market efficiencies.
- c) What is DEML’s understanding of the charge for transportation services that is currently embedded/included on EGD’s bills to customers?
- d) Does DEML currently have a contract with its customers specifying the price it can charge for transportation services? If so, please explain. If not, how will DEML decide what price for transportation services to include on customers bills?

Question 2:

Reference: DEML Written Evidence, Exhibit L, Tab 7, Page 2.

Preamble: DEML states: “Furthermore, in BP IRR#5, (Exhibit I, Tab 10, Schedule 5), EGD submits that all expected gas supplies including non-direct purchase customers and contracted peaking supplies, arrived at the franchise area during the peak days noted above. EGD has also claimed that they may be required to curtail firm large volume customers to protect its system, or to restore system pressure should an outage occur as a result of a supply shortfall. However no past occurrences of such events exist. In fact, during the January 13th to 15th, 2009 stressed time period, Interruptible customers were still able to flow 439,235 GJ into the EGD franchise area through Curtailed Service Delivery (CSD), which demonstrates that the system is not in jeopardy. EGD’s own evidence shows that the current nomination/system balancing process worked as expected, and all gas was delivered as required by market participants.”

Request:

- a) For each day of the peak winter period from January 13-15, 2009 please provide the daily delivered energy by DEML to EGD in each of the EGD’s CDA and EDA by TransCanada service type (FT, STFT, IT, Diversions/Alternate Receipt etc.).
- b) Were any of DEMLs’ TransCanada nominations to EGD’s CDA or EDA not fully authorized during the January 13-15 period?

Question 3:

Reference: DEML Written Evidence, Exhibit L, Tab 7, Page 6.

Preamble: DEML states: “According to the EGD response to DEML IR#2, 246,000 GJ of Empress to CDA or EDA expires in October of 2009.”

Request: Please provide the details behind the derivation of the 246,000 GJ amount.

Question 4:

Reference: DEML’s evidence on Page 3, last sentence in first paragraph following the “Quantifying the Risk” heading: “As noted later in this submission, the estimated costs of this request to the Ontario market of \$53M is an inappropriate and unnecessary over-insurance of a risk that has not been quantified.”

Preamble: TransCanada wishes to better understand DEML's statement related to risk.

Request:

- a) What is the "risk" that DEML refers to in the referenced statement?
- b) For each of the residential, commercial and industrial market categories, please provide the annual and average daily delivered energy in calendar year 2008 to each of the EGD's CDA and EDA franchise areas.
- c) For each of the market categories and for each of EGD's CDA and EDA franchise areas identified in b) above, please provide the annual and average daily energy delivered in calendar year 2008 by TransCanada service type (e.g. FT, IT, STFT, Diversions / Alternate Receipts, etc.).
- d) For the categories of markets identified in a) above, please provide proforma contracts:
 1. between DEML and EGD; and
 2. between DEML and the customer.
- e) For each of the categories of markets described in b) above, please describe DEML's understanding of the implications if DEML failed to meet its obligation to deliver gas to the Enbridge CDA or Enbridge EDA. In this description, please include:
 1. if the gas supply to the end user would be restricted; and
 2. if the answer to 1) is no, please describe the source of the replacement supply on that day.
- f) Given the implications discussed in (e), please describe what level of risk DEML would consider reasonable and on what basis this consideration would be made?