TransCanada
In business to deliver

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April 20, 2009

Filed Electronically

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

Attention: Ms. Kirsten Walli, Board Secretary

Dear Madam:

Re: Enbridge Gas Distribution 2009 Rates – Phase 2
Ontario Energy Board (the "Board")
File No. EB-2008-0219
TransCanada PipeLines Limited ("TransCanada") Interrogatory Responses

In accordance with the requirements in Procedural Order No. 6, please find attached two hard copies of TransCanada's Interrogatory Responses to:

- Canadian Manufactures Exporters;
- Direct Energy Marking Limited; and
- Shell Energy North America (Canada) Inc.

Yours truly,

[Original signed by]

Nadine Berge
Senior Legal Counsel
Law and Regulatory Research

Enclosures

CME-TCPL 1

Reference: Exhibit L, Tab 21, page 1

Request:

At lines 9 to 12, TCPL states that it is providing information regarding its services, system design, capacity and operations to assist the Board in judging "the merits of Enbridge's proposal." In the context of this statement, please provide the following:

(a) TCPL's position on the merits of Enbridge's proposal; and

(b) Please advise whether TCPL has a gas marketing affiliate and if so, then the position of TCPL's gas marketing affiliate on the merits of the proposal of Enbridge Gas Distribution Inc. ("EGD").

Response:

(a) TransCanada PipeLines Limited ("TransCanada") has no position at this point on the overall merits of Enbridge Gas Distribution Inc.'s ("EGD's") proposal. However, TransCanada believes that firm transportation contracts help to mitigate the risk of supply disruptions. TransCanada respectfully suggests that the Ontario Energy Board ("OEB" or the "Board"), in its assessment of the EGD proposal, should consider the relative risks of the various upstream transportation alternatives.

Should the Board rule in favour of the EGD proposal, TransCanada believes that firm, long-haul service on TransCanada represents the best option in terms of availability, flexibility, reliability, contract terms and access to supply.

(b) TransCanada's affiliate, TransCanada Energy Ltd ("TCE"), holds an OEB natural gas marketer license. However, TransCanada exited its historical natural gas marketing and trading business in 2001 when it divested its natural gas marketing operations, most of its natural gas transportation and storage contracts and the lease arrangements for its Toronto natural gas marketing office to Mirant and sold the assets of its A.E. Sharp natural gas agency and consulting business to undisclosed purchasers. Currently, TCE's natural gas transactions support the needs of TransCanada's electricity generation and natural gas storage businesses lines. TransCanada understands that TCE takes no position on the merits of EGD's proposal.

CME-TCPL 2

Reference: Exhibit L, Tab 21, page 21

Request:

At lines 4 to 6, TCPL indicates that, on the peak day demand day during this past winter of 2008/2009, Discretionary services on TCPL were used to deliver 53.8% of the gas transmitted to EGD's CDA markets and 34.4% of the gas transmitted to EGD's EDA markets. Please provide the following information:

(a) For each of the peak demand days in each of the eight winters from 2000/2001 to 2007/2008 inclusive, the proportions of EGD CDA and EDA markets which were served using TCPL Discretionary services.

Response:

Since both CME-TCPL 2 and Shell-TCPL 1(b) requested similar data, TransCanada has provided the combined response in CME-TCPL 2.

For each of the Enbridge CDA and EDA, below are tables summarizing the average daily and peak day deliveries by service type for the Winter seasons 2000/2001 through 2007/2008 inclusive, and the average daily deliveries by service type for the Winter 1995/1996.

Enbridge CDA
2007/2008

	Average Day		Peak Day (*)	
	GJ	% of total	GJ	% of total
Long-term Firm	578,519	65%	764,390	62%
Discretionary				
• STFT	55,176	6%	100,747	8%
• Diversion & ARP	197,715	22%	213,434	17%
• IT	52,174	6%	157,516	13%
Total	883,585	100%	1,236,087	100%

*Peak day occurred on February 27, 2008

CME-TCPL 2

Enbridge CDA 2006/2007

	Average Day		Peak Day (*)	
	GJ	% of total	GJ	% of total
Long-term Firm	395,657	48%	585,377	44%
Discretionary				
• STFT	170,374	21%	247,000	19%
• Diversion & ARP	140,655	17%	410,609	31%
• IT	124,245	15%	87,420	7%
Total	830,930	100%	1,330,406	100%

*Peak day occurred on February 15, 2007

Enbridge CDA 2005/2006

	Average Day		Peak Day (*)	
	GJ	% of total	GJ	% of total
Long-term Firm	660,352	77%	904,717	80%
Discretionary				
• STFT	32,671	4%	32,108	3%
• Diversion & ARP	119,790	14%	46,223	4%
• IT	47,910	6%	145,350	13%
Total	860,722	100%	1,128,398	100%

*Peak day occurred on February 18, 2006

Enbridge CDA 2004/2005

	Average Day		Peak Day (*)	
	GJ	% of total	GJ	% of total
Long-term Firm	729,085	81%	953,058	63%
Discretionary				
• STFT	26,662	3%	24,679	2%
• Diversion & ARP	100,278	11%	93,214	6%
• IT	40,988	5%	436,311	29%
Total	897,013	100%	1,507,262	100%

*Peak day occurred on January 23, 2005

CME-TCPL 2

Consumers/Enbridge CDA
2003/2004

	Average Day		Peak Day (*)	
	GJ	**% of total**	**GJ**	**% of total**
Long-term Firm	458,856	53%	626,519	47%
Discretionary				
• STFT	227,433	26%	394,250	30%
• Diversion & ARP	157,805	18%	168,726	13%
• IT	26,879	3%	131,645	10%
Total	870,973	100%	1,321,140	100%

*Peak day occurred on January 15, 2004
*DDA Name changed from Consumers CDA to Enbridge CDA on December 1, 2003

Consumers CDA
2002/2003

	Average Day		Peak Day (*)	
	GJ	**% of total**	**GJ**	**% of total**
Long-term Firm	640,635	75%	703,909	56%
Discretionary				
• STFT	57,173	7%	95,749	8%
• Diversion & ARP	37,669	4%	149,299	12%
• IT	122,997	14%	319,244	25%
Total	858,474	100%	1,268,201	100%

*Peak day occurred on March 3, 2003

Consumers CDA
2001/2002

	Average Day		Peak Day (*)	
	GJ	**% of total**	**GJ**	**% of total**
Long-term Firm	545,771	75%	661,847	70%
Discretionary				
• STFT	-	0%	-	0%
• Diversion & ARP	42,395	6%	27,171	3%
• IT	139,173	19%	259,486	27%
Total	727,339	100%	948,504	100%

*Peak day occurred on February 4, 2002

CME-TCPL 2

Consumers CDA
2000/2001

	Average Day		**Peak Day (*)**	
	GJ	**% of total**	**GJ**	**% of total**
Long-term Firm	598,718	81%	650,982	70%
Discretionary				
• STFT		0%		0%
• Diversion & ARP	108,622	15%	149,342	16%
• IT	32,901	4%	133,492	14%
Total	740,240	100%	933,816	100%

*Peak day occurred on January 1, 2001

Consumers CDA
1995/1996

	Average Day	
	GJ	% of total
Long-term Firm	617,718	92%
Discretionary		
• STFT, TWS*	641	<1%
• Diversions	50,592	8%
• IT	3,514	<1%
Total	672,464	100%

* Temporary Winter Service

Enbridge EDA
2007/2008

	Average Day		**Peak Day (*)**	
	GJ	**% of total**	**GJ**	**% of total**
Long-term Firm	236,313	77%	324,090	73%
Discretionary				
• STFT	-	0%	-	0%
• Diversion & ARP	67,264	22%	119,911	27%
• IT	2,850	1%	39	0%
Total	306,427	100%	444,040	100%

*Peak day occurred on December 15, 2007

CME-TCPL 2

Enbridge EDA
2006/2007

	Average Day		Peak Day (*)	
	GJ	% of total	GJ	% of total
Long-term Firm	210,777	73%	323,275	66%
Discretionary				
• STFT	-	0%	-	0%
• Diversion & ARP	75,972	26%	166,589	34%
• IT	1,650	1%	-	0%
Total	288,399	100%	489,864	100%

*Peak day occurred on February 15, 2007

Enbridge EDA
2005/2006

	Average Day		Peak Day (*)	
	GJ	% of total	GJ	% of total
Long-term Firm	207,381	74%	323,800	74%
Discretionary				
• STFT	-	0%	-	0%
• Diversion & ARP	42,166	15%	42,825	10%
• IT	31,682	11%	70,751	16%
Total	281,228	100%	437,376	100%

*Peak day occurred on January 16, 2006

Enbridge EDA
2004/2005

	Average Day		Peak Day (*)	
	GJ	% of total	GJ	% of total
Long-term Firm	233,420	76%	324,334	64%
Discretionary				
• STFT	-	0%	-	0%
• Diversion	53,104	17%	122,395	24%
• IT	21,329	7%	61,569	12%
Total	307,853	100%	508,298	100%

*Peak day occurred on January 21, 2005

CME-TCPL 2

Consumers/Enbridge EDA 2003/2004

	Average Day		Peak Day (*)	
	GJ	**% of total**	**GJ**	**% of total**
Long-term Firm	230,145	76%	323,833	60%
Discretionary				
• STFT	5,526	2%	10,000	2%
• Diversion	53,290	18%	154,272	29%
• IT	14,692	5%	49,954	9%
Total	303,653	100%	538,059	100%

*Peak day occurred on January 15, 2004
*DDA Name changed from Consumers EDA to Enbridge EDA on December 1, 2003

Consumers EDA 2002/2003

	Average Day		Peak Day (*)	
	GJ	**% of total**	**GJ**	**% of total**
Long-term Firm	272,357	88%	378,281	79%
Discretionary				
• STFT	-	0%	-	0%
• Diversion	32,554	10%	82,319	17%
• IT	5,308	2%	21,101	4%
Total	310,219	100%	481,701	100%

*Peak day occurred on January 22, 2003

Consumers EDA 2001/2002

	Average Day		Peak Day (*)	
	GJ	**% of total**	**GJ**	**% of total**
Long-term Firm	188,709	72%	311,777	76%
Discretionary				
• STFT	-	0%	-	0%
• Diversion	7,431	3%	5,156	1%
• IT	66,059	25%	91,913	22%
Total	262,199	100%	408,846	100%

*Peak day occurred on February 11, 2002

CME-TCPL 2

Consumers EDA
2000/2001

	Average Day		**Peak Day (*)**	
	GJ	**% of total**	**GJ**	**% of total**
Long-term Firm	284,531	97%	406,299	99%
Discretionary				
• STFT	-	0%		0%
• Diversion	7,847	3%	6,023	1%
• IT	168	0%	-	0%
Total	292,546	100%	412,322	100%

*Peak day occurred on December 8, 2000

Consumers EDA
1995/1996

	Average Day	
	GJ	% of total
Long-term Firm	264,974	99%
Discretionary		
• STFT, TWS*	0	0%
• Diversions	3,115	1%
• IT	461	<1%
Total	268,550	100%

* Temporary Winter Service

Note: IT includes STS-Overrun where applicable.

Average Daily Winter Season Deliveries - Enbridge CDA

	Quantity (GJ/d)			**%**		
	Long-Term Firm	**Discretionary**	**Total**	**Long-Term Firm**	**Discretionary**	**Total**
1995/96	617,718	54,747	672,465	91.9%	8.1%	100.0%
2000/01	598,718	141,523	740,241	80.9%	19.1%	100.0%
2001/02	545,771	181,568	727,339	75.0%	25.0%	100.0%
2002/03	640,636	217,839	858,475	74.6%	25.4%	100.0%
2003/04	458,856	412,117	870,973	52.7%	47.3%	100.0%
2004/05	729,085	167,928	897,013	81.3%	18.7%	100.0%
2005/06	660,352	200,371	860,723	76.7%	23.3%	100.0%
2006/07	395,657	435,274	830,931	47.6%	52.4%	100.0%
2007/08	578,519	305,065	883,584	65.5%	34.5%	100.0%
2008/09	477,388	408,805	886,193	53.9%	46.1%	100.0%

CME-TCPL 2

Peak Winter Day Deliveries - Enbridge CDA

	Quantity (GJ)			%		
	Long-Term Firm	Discretionary	Total	Long-Term Firm	Discretionary	Total
1995/96	N/A	N/A				
2000/01	650,982	282,834	933,816	69.7%	30.3%	100.0%
2001/02	661,847	286,657	948,504	69.8%	30.2%	100.0%
2002/03	703,909	564,292	1,268,201	55.5%	44.5%	100.0%
2003/04	626,519	694,621	1,321,140	47.4%	52.6%	100.0%
2004/05	953,058	554,204	1,507,262	63.2%	36.8%	100.0%
2005/06	904,717	223,681	1,128,398	80.2%	19.8%	100.0%
2006/07	585,377	745,029	1,330,406	44.0%	56.0%	100.0%
2007/08	764,390	471,697	1,236,087	61.8%	38.2%	100.0%
2008/09	659,323	768,452	1,427,775	46.2%	53.8%	100.0%

Average Daily Winter Season Deliveries - Enbridge EDA

	Quantity (GJ/d)			%		
	Long-Term Firm	Discretionary	Total	Long-Term Firm	Discretionary	Total
1995/96	264,974	3,576	268,550	98.7%	1.3%	100.0%
2000/01	284,531	8,015	292,546	97.3%	2.7%	100.0%
2001/02	188,709	73,490	262,199	72.0%	28.0%	100.0%
2002/03	272,357	37,862	310,219	87.8%	12.2%	100.0%
2003/04	230,145	73,508	303,653	75.8%	24.2%	100.0%
2004/05	233,420	74,433	307,853	75.8%	24.2%	100.0%
2005/06	207,381	73,848	281,229	73.7%	26.3%	100.0%
2006/07	210,777	77,622	288,399	73.1%	26.9%	100.0%
2007/08	236,313	70,114	306,427	77.1%	22.9%	100.0%
2008/09	221,104	90,424	311,528	71.0%	29.0%	100.0%

Peak Winter Day Deliveries - Enbridge EDA

	Quantity (GJ)			%		
	Long-Term Firm	Discretionary	Total	Long-Term Firm	Discretionary	Total
1995/96	N/A	N/A				
2000/01	406,299	6,023	412,322	98.5%	1.5%	100.0%
2001/02	311,777	97,069	408,846	76.3%	23.7%	100.0%
2002/03	378,281	103,420	481,701	78.5%	21.5%	100.0%
2003/04	323,833	214,226	538,059	60.2%	39.8%	100.0%

CME-TCPL 2

2004/05	324,334	183,964	508,298	63.8%	36.2%	100.0%
2005/06	323,800	113,576	437,376	74.0%	26.0%	100.0%
2006/07	323,275	166,589	489,864	66.0%	34.0%	100.0%
2007/08	324,090	119,950	444,040	73.0%	27.0%	100.0%
2008/09	332,297	181,973	514,270	64.6%	35.4%	100.0%

CME-TCPL 3

Reference: Exhibit L, Tab 21, pages 10, 11, 21 and 22

Request:

At lines 20 and 21 on page 2 of Exhibit L, Tab 21, TCPL indicates that it currently has 1,550,000 GJ/day of firm capacity available to serve the Enbridge CDA and 386,000 GJ/day to serve the Enbridge EDA. At page 10 of Exhibit L, Tab 21, at lines 12 to 19, TCPL indicates that there is some 309,500 GJ/day to the Enbridge CDA committed to new gas-fired power generators. Please provide the following information:

(a) Please confirm that the 309,000 GJ/day of capacity for Portlands, Goreway and Thorold is now contractually committed and that the 1,550,000 GJ/day of excess capacity to the Enbridge CDA is over and above the capacity committed to Portlands, Goreway and Thorold; and

(b) For each of the years 2009 to 2019 inclusive, please provide TCPL's current estimate of available firm capacity to the Enbridge CDA and EDA markets.

Response:

(a) Confirmed. Please refer to the response to Shell-TCPL 2.

(b) TransCanada does not forecast future firm contract levels. However, future firm capacity availability will be affected by two factors:

- The expected growth in Ontario market demand, mainly due to increased gas fired power generation may also reduce available capacity. Demand growth in upstream or downstream markets may also reduce available capacity.
- Efficiency measures which could include retirement of inefficient or obsolete compressor units or the conversion of spare lines to oil service as in the case of the Keystone Pipeline Project. These efficiency measures would decrease future available capacity.

Barring any future facilities additions or planned pipe or compression retirements, pipeline capacity would not change into the future.

CME-TCPL 4

Reference: Exhibit L, Tab 21 – General

Request:

In the context of the overall competitive commodity markets at Dawn and other gas commodity trading points in Ontario, please provide TCPL's view on whether the risk of a marketer failing to meet its delivery obligation to EGD is currently low, medium or high.

Response:

TransCanada is not able to provide the requested information because the request contains insufficient information. TransCanada would expect the level of risk of a marketer failing to meet its delivery obligation to be marketer and situation specific.

CME-TCPL 5

Reference: Exhibit L, Tab 21 – General

Request:

Can the competitive commodity markets and the secondary markets in capacity currently operate, either separately or in combination, to provide 100% mitigation of the risk of a marketer failing to meet its delivery obligations to EGD? Please provide a full description of the rationale for the response to this question.

Response:

No. Substantial markets within the Enbridge service territory are presently supplied using discretionary transportation services on TransCanada. Should demand for discretionary capacity exceed the capacity available, shippers serving markets within the Enbridge territory may be unable to fully meet their contractual delivery commitments.

Shippers may endeavor to obtain additional discretionary capacity at subsequent nomination windows, perhaps by increasing their bid price for Interruptible Service or by seeking to purchase supplies from other shippers via Diversion of Firm Transportation service contracted to other locations on the system. However, there are no guarantees that such efforts will be successful. Depending on the nature of the capacity constraint on the TransCanada system or on other systems, there may be minimal opportunity to increase discretionary flows to the Enbridge territory regardless of commodity and secondary market prices. Further, during capacity constraints, whether caused by pipeline facility outages, extreme cold weather, or a combination of both factors, discretionary shippers may have to compete for a scarce resource (transportation service) with many other markets throughout eastern Canada and the northeast United States. Such other markets may have an equal urgency to ensure transportation capacity and gas supplies to meet their own requirements. In such circumstances, a core market in Montreal or New York may be unwilling to sell supply and transportation capacity (via Diversion of their firm service transportation contract) to a customer in Toronto or Ottawa at any price.

CME-TCPL 6

Reference: Exhibit L, Tab 21 – General

Request:

Please explain why and provide an estimate of the extent to which the ability of competitive commodity markets and secondary markets in capacity, either separately or in combination, to fully mitigate the risk of a marketer failing to meet its delivery obligation to EGD, will be materially reduced as new incremental power generator load is added in EGD's franchise area.

Response:

Please refer to the response to CME-TCPL 5 and Shell-TCPL 3.

CME-TCPL 7

Reference: Exhibit L, Tab 21 – General

Request:

Please provide TCPL's estimate of the approximate incremental costs in $/GJ for a marketer to convert the TCPL Discretionary services, it currently uses, to FT services on TCPL.

Response:

TransCanada is not able to provide the requested information because the request contains insufficient information. The cost of converting from discretionary services to FT services is dependant on which services are utilized and their level of utilization. The current tolls are:

Service	Toll ($/GJ)
FT: 100% load factor	$1.1900
STFT: biddable, floor price equals 100% load factor FT toll	$1.1900 (floor price)
IT: biddable, floor price equals 1.10 times the 100% load factor FT toll	$1.3090 (floor price)