

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.

<b>TCPL Firm Transportation Capacity November-08</b>	
	<b>Gj/d</b>
1 EGD FT	640,520
2 STS	364,503
3 Direct shippers	36,362
4 Direct shippers - power generators	260,000
5 Total FT - EGD franchise	1,301,385

Source: TCPL Nov 1, 2008 Index of Customers

Witnesses: M. Giridhar  
K. Irani

EGD's table on TCPL firm transportation capacity is revised as follows:

Row 1 is revised to include an EGD short haul contract that was excluded in the initial calculation, and updated to include all of EGD's FT contracts on TransCanada,

Row 2 identifies EGD's Storage transportation contracts (STS).

Row 3 identifies direct shippers who have their own contracted capacity on TCPL and excludes EGD AOTS volumes.

Consequently, the data aligns with TCPL's contracted shipper data.

- 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