July 15, 2010

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: EB-2010-0207 – Union Gas Limited - Dawn to Dawn TCPL Firm Rate

Please find attached Union's responses to interrogatories specific to the above-noted proceeding. Pursuant to the Board's letter approving Union's request for an extension on the deadline for responses to interrogatories (dated July 9, 2010), attached are Union's responses to the interrogatories from Board staff and the Canadian Manufacturers & Exporters ("CME"). These responses reflect the updated evidence also filed today.

Please contact me at (519) 436-5473 if you have any questions or wish to discuss this submission in more detail.

Yours truly,

[Original signed by]

Karen Hockin
Manager, Regulatory Initiatives

c.c.: EB-2010-0207 Intervenors
Mark Kitchen, Union Gas
Crawford Smith, Torys
Lawrie Gluck, Board Staff

UNION GAS LIMITED

Answer to Interrogatory from
Board Staff

Ref: Exhibit A – Introduction

Union stated that the proposed new service is a direct response to the changing North American natural gas market. Union noted that the continued decline in gas supplies from the Western Canadian Sedimentary Basin ("WCSB") and growth in new sources of supply in the US Northeast are impacting the flows of natural gas both into and out of Dawn.

a) Please provide evidence of declining WCSB natural gas supply to Ontario.

b) Please provide evidence of the growth in US Northeast natural gas supplies.

c) Is Union aware of any plans for a new transportation service which moves gas from the US Northeast into Ontario?

d) Is the transportation system in the US Northeast sufficiently robust to support long-term supply to the Ontario market?

e) Does Union believe that the above noted market changes are short-term (<5 years) or long-term in nature (>5 years)?

Response:

a,b) Please see the attached CAMPUT webinar presentation (updated) (Attachment 1).

c,d) Union is aware of open seasons conducted recently by National Fuel Gas Supply Corporation, Tennessee Gas Pipeline Company, Empire State Pipeline, Inc., and TransCanada Pipelines. These open seasons, combined with Union's open season earlier this year, can facilitate bringing gas from the Marcellus production area back to Dawn. Copies of the open season documents are attached as Attachment 2. These pipelines have historically contributed to the export of natural gas from Ontario to the US Northeast, and this same infrastructure can be utilized, with modifications, to facilitate the import of natural gas from the US Northeast into Ontario.

e) The decline in gas supplies from the Western Canadian Sedimentary Basin and the increase in supplies from the Marcellus Shale in New York and Pennsylvania are expected to be long term in nature.

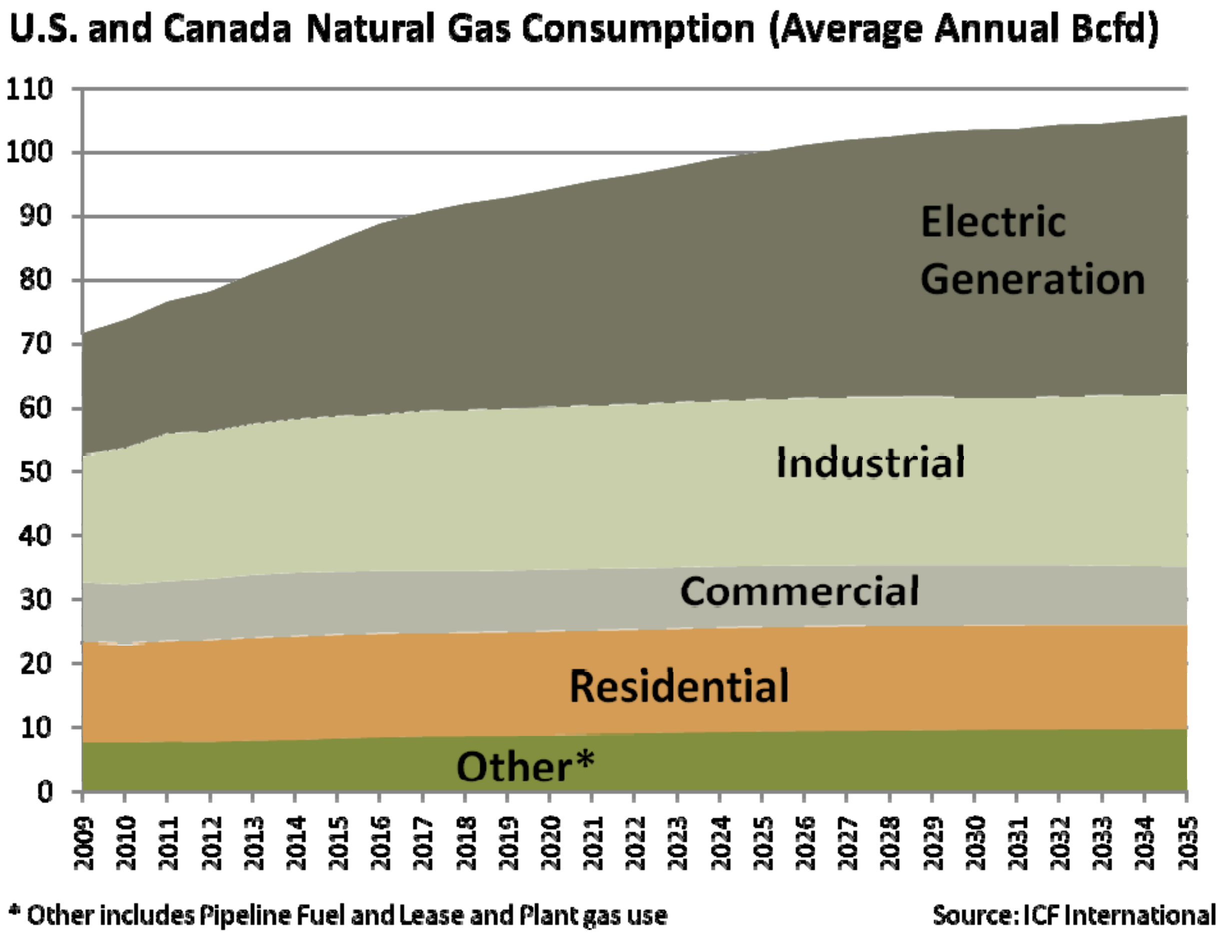
Changing Gas Supply Dynamics in North America

CAMPUT Webinar

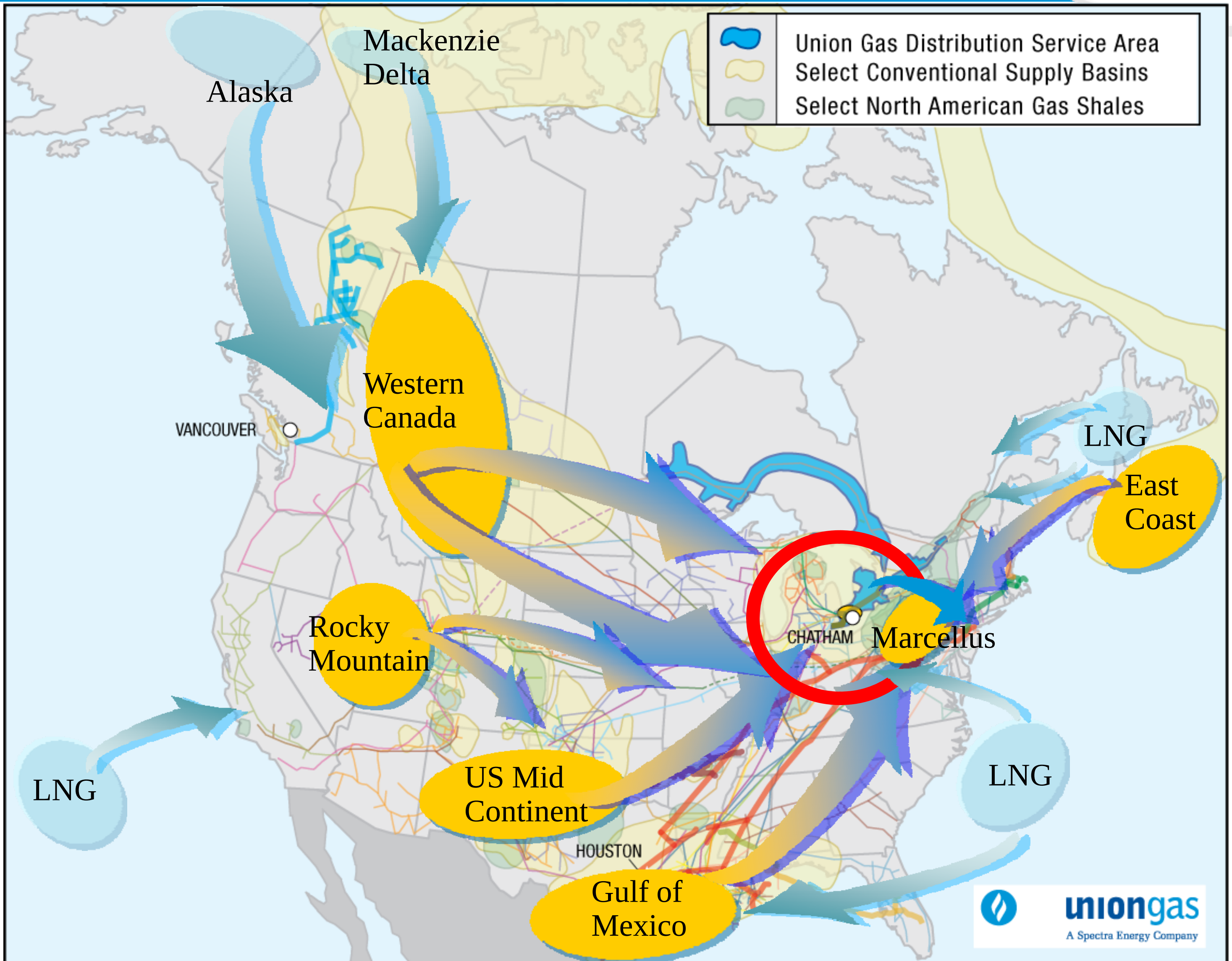
25 June 2010 (Updated)

Gas Demand Outlook

- After 2009, demand growth resumes, led by growing gas use for electric generation.
  - By 2035, total gas consumption in the U.S. and Canada is projected to reach an average of 105 Bcfd.
- Very little demand growth occurs in the other sectors.

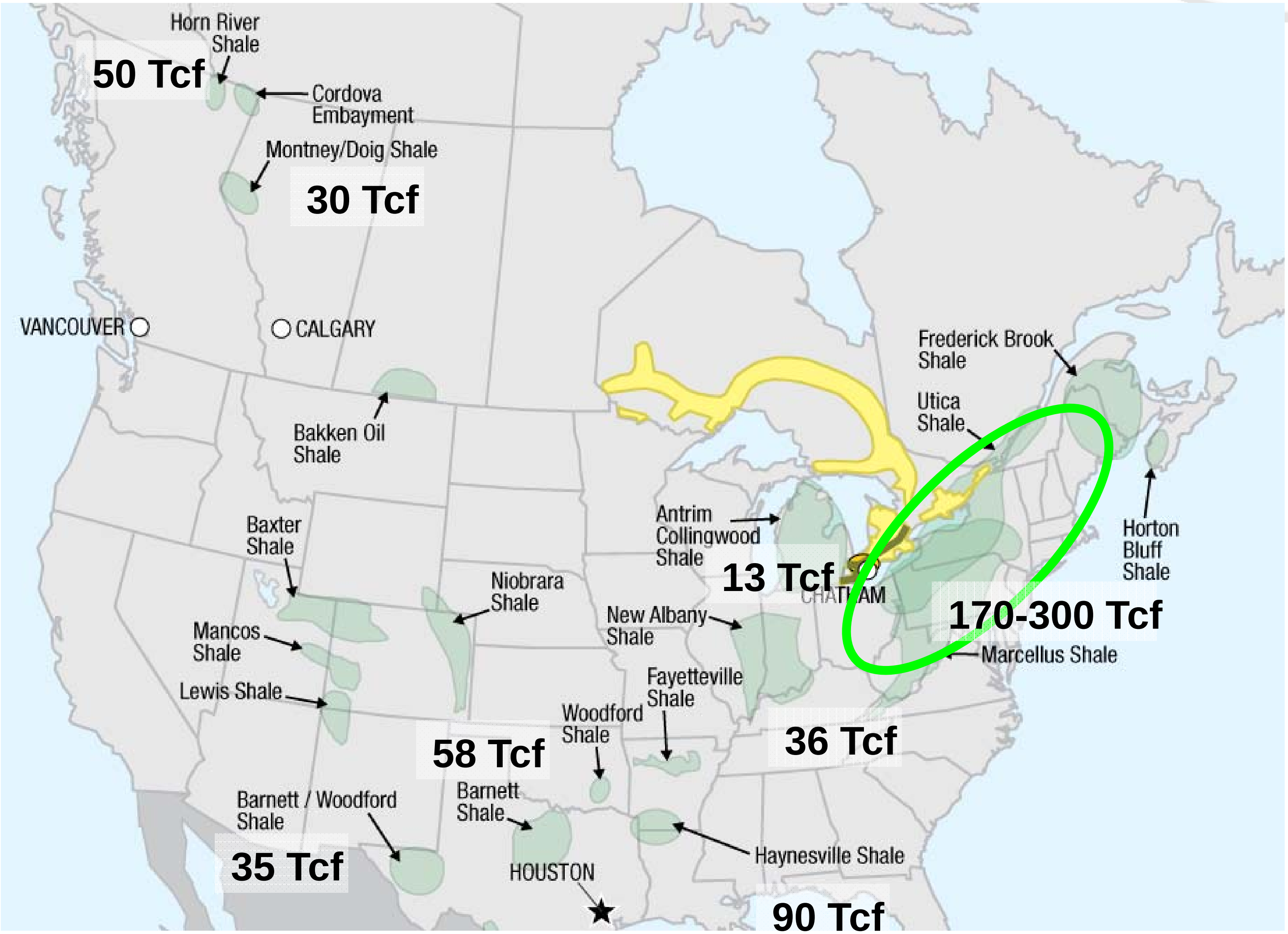


The North American Gas Market



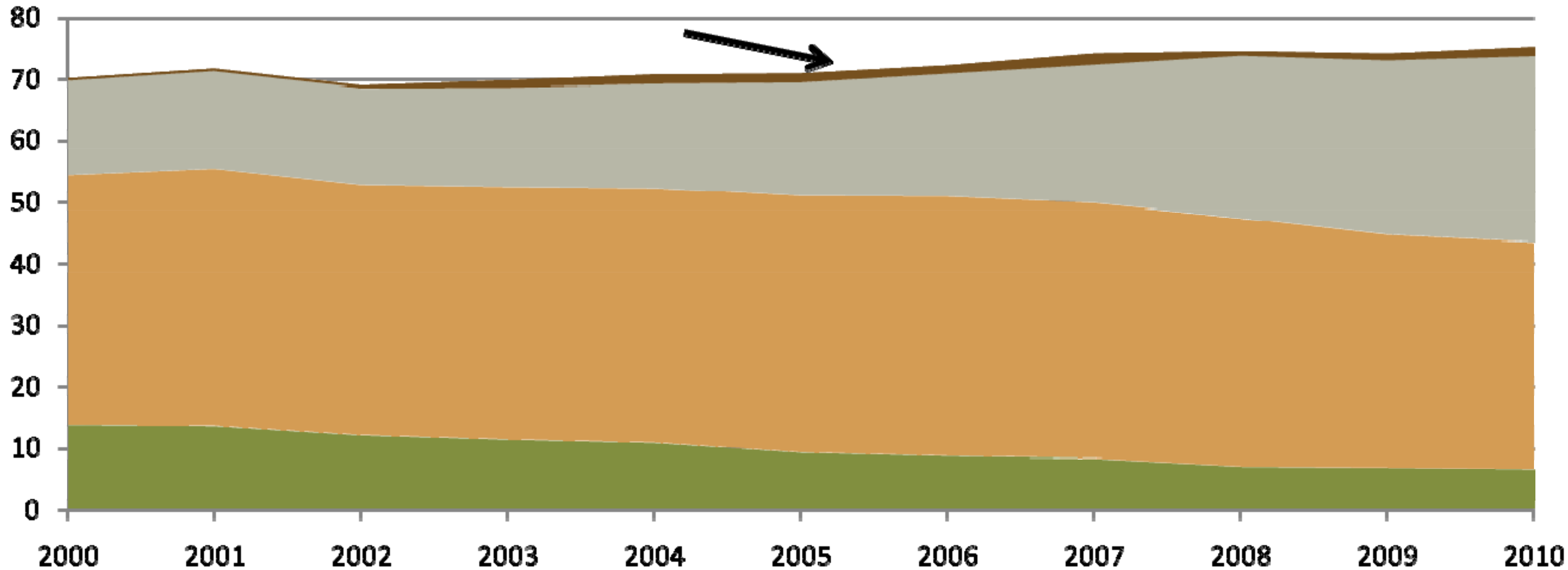
Shale Gas….'The Real Deal'
Strong Resource Base

uniongas



North American Supply

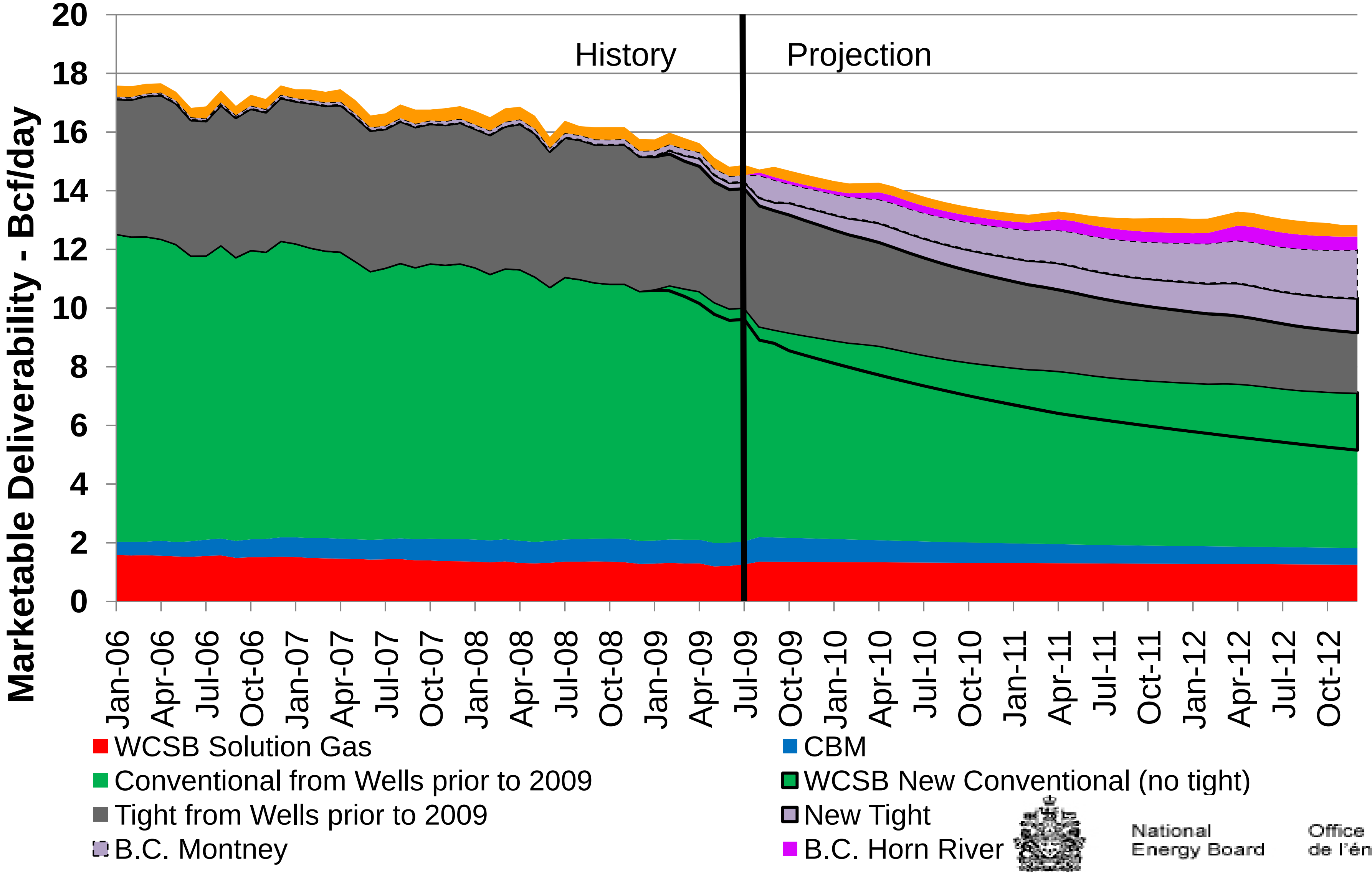
U.S. and Canada Natural Gas Supplies (Average Annual Bcfd)



Source: ICF International

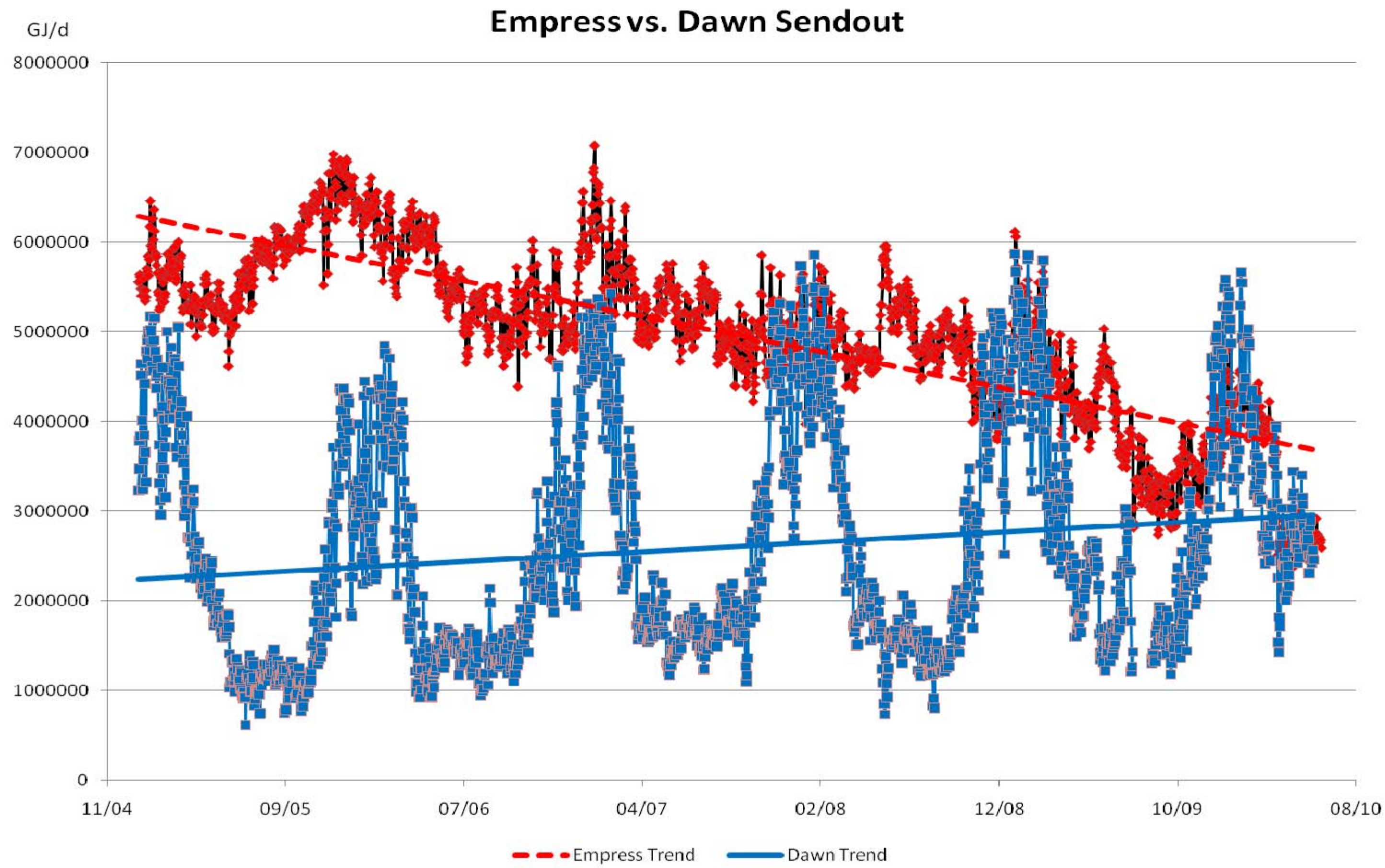
- Conventional gas production has been declining over the past decade.
- At the same time, production from unconventional gas sources, including shale formations, tight sands, and coal bed methane, has been steadily increasing.
  - In the past five years, increases in unconventional gas production have more than made up for declines in conventional production.

Western Canadian Supply Forecast



National Energy Board | Office national de l'énergie

Empress v Dawn Sendout



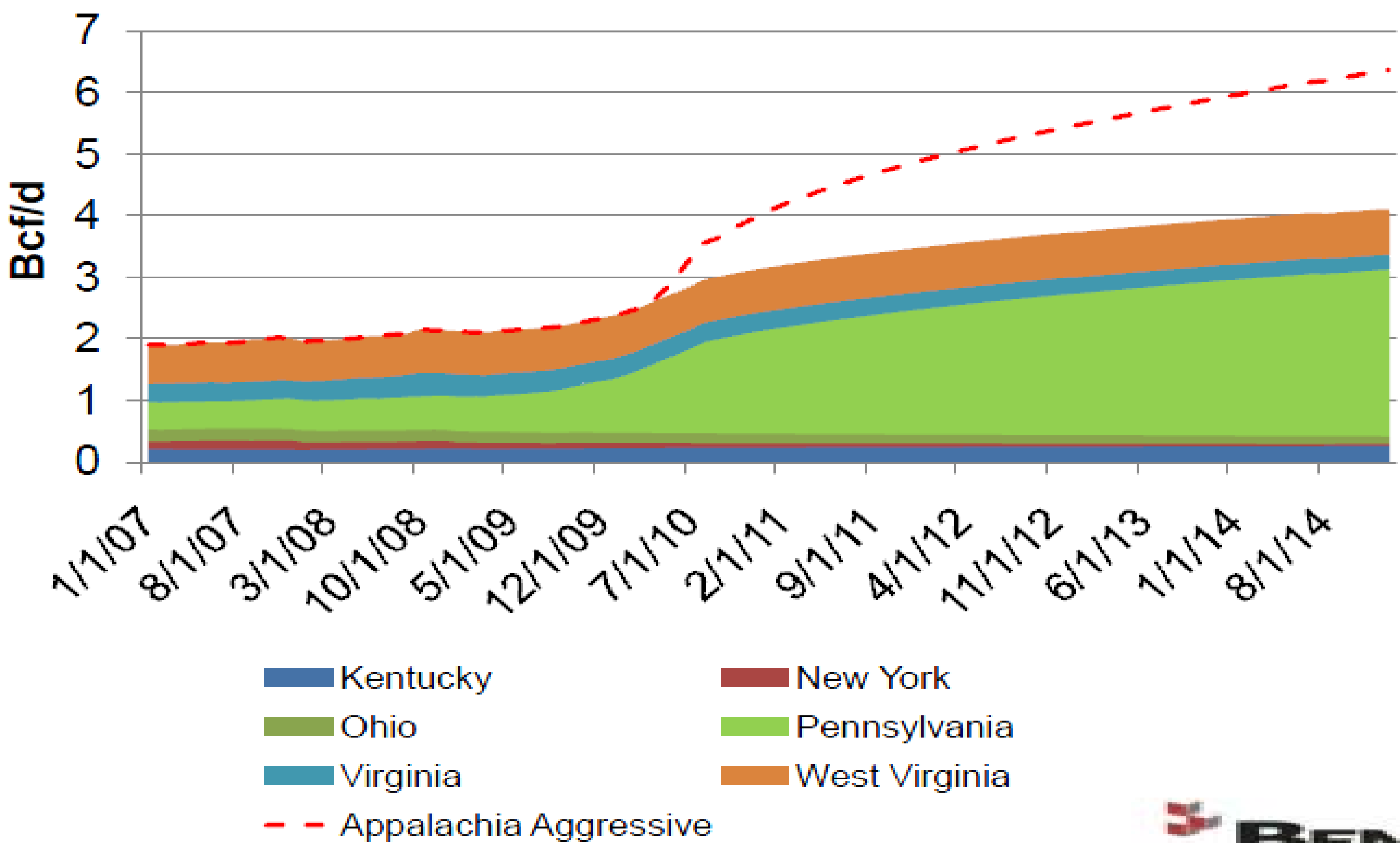
Decline in WCSB production and poor pipeline economics lead to a decline in throughput from Empress, Alberta to Eastern markets (via TCPL Mainline)

- WCSB is a mature / higher cost production basin
- High tolls on TCPL Mainline create poor pipeline economics ($1.19 to $1.64/GJ)

Less supply from WCSB results in an increase in Dawn gas price.
New supplies at Dawn will lower basis/prices

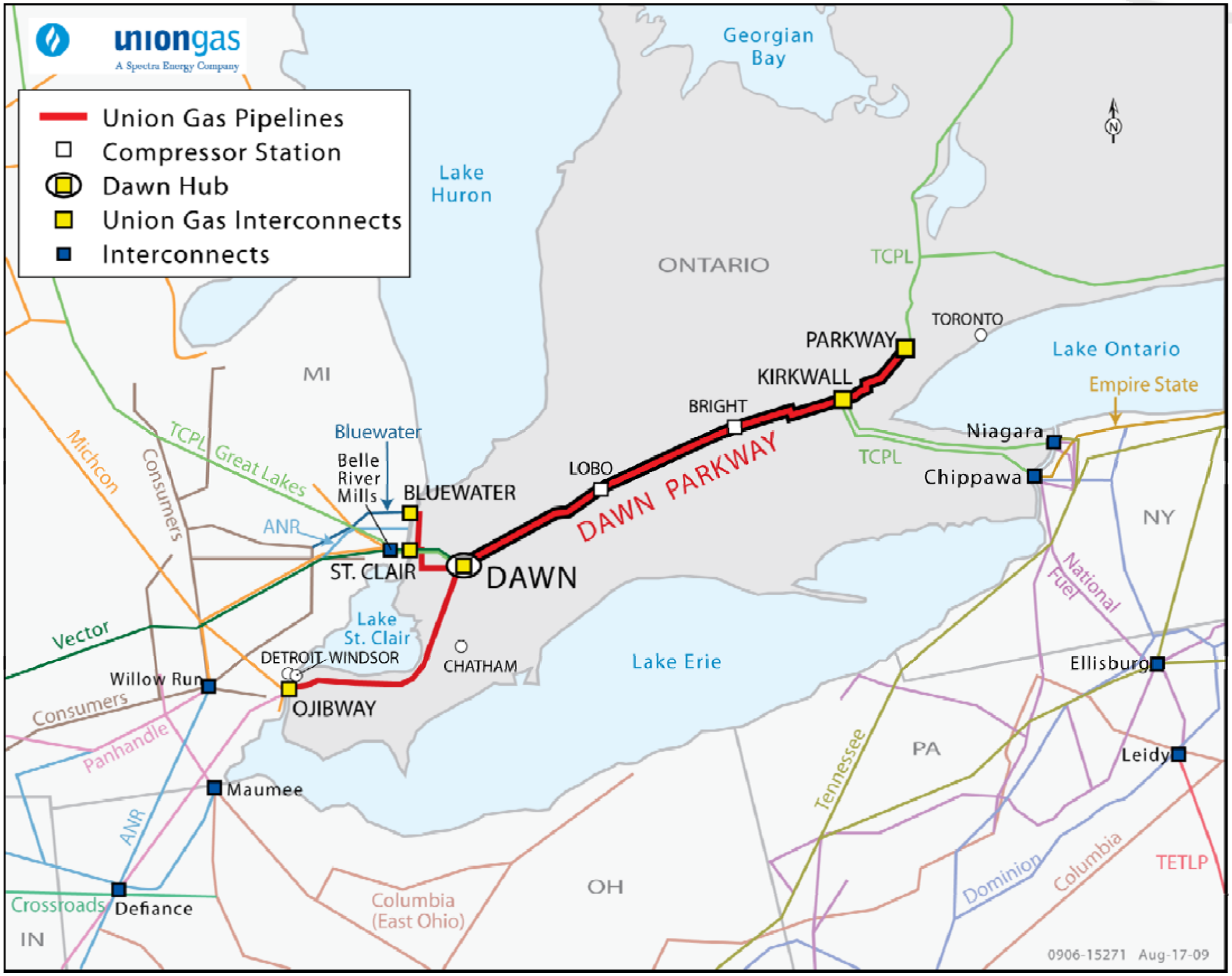
Marcellus Growth

Appalachian Production Growth



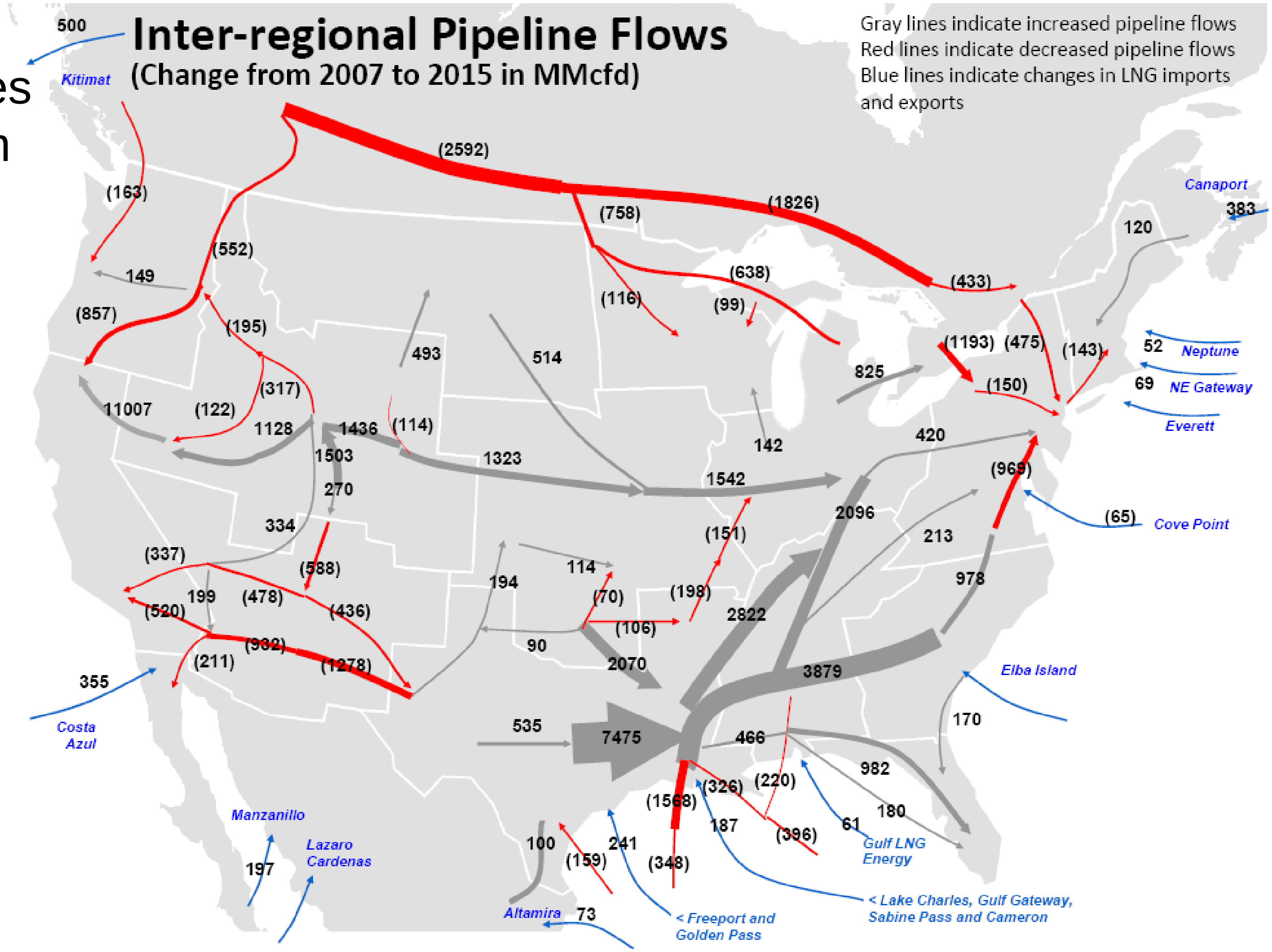
Source: BENTEK

Union Gas System

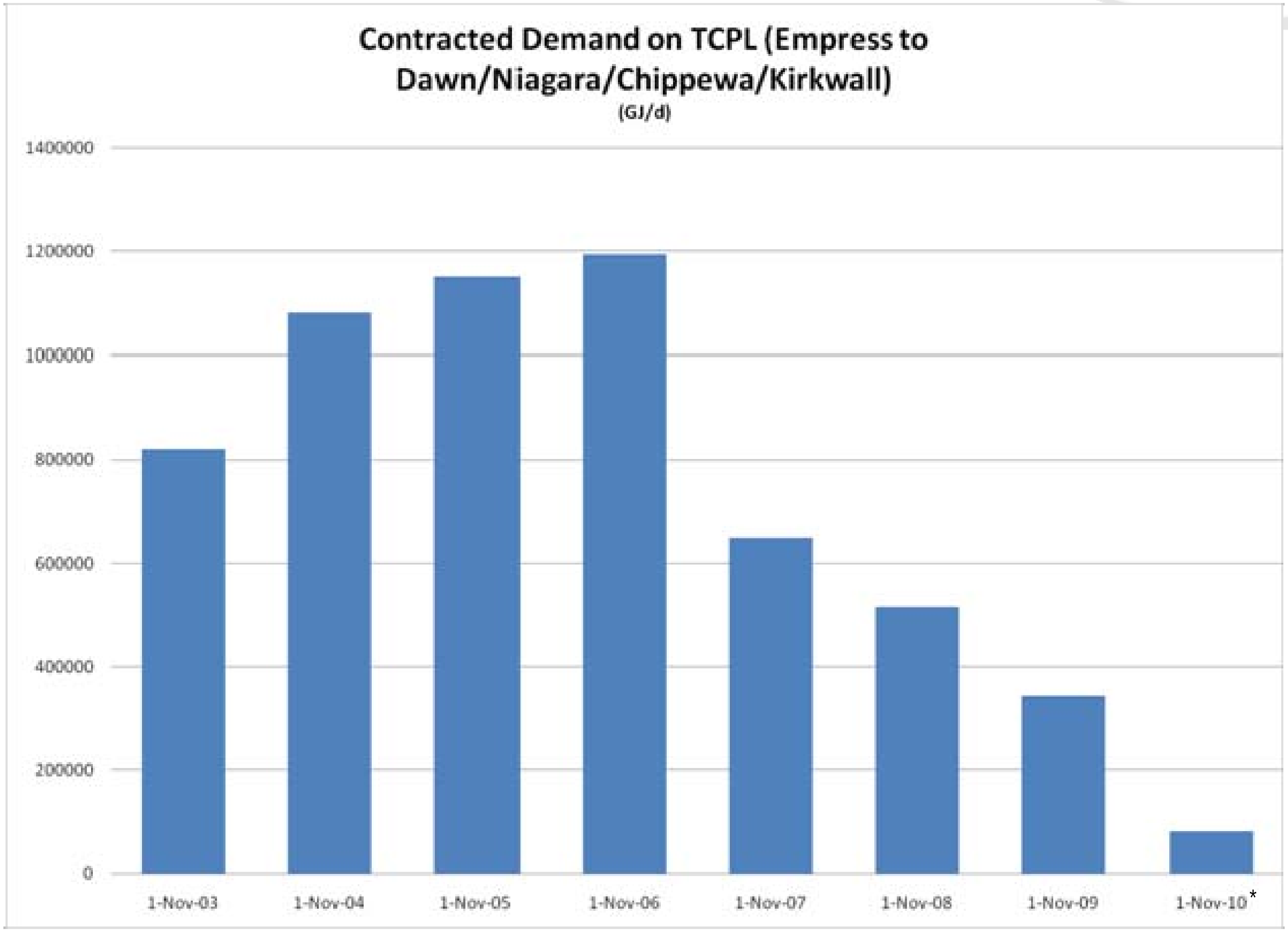


New Gas Supplies Affect Regional Flow Patterns 2007-2015

- Greatest increases in supply are from the Rockies and the Midcontinent shales.
- Exports from Western Canada down due to declining production and increased gas consumption in Western Canada.



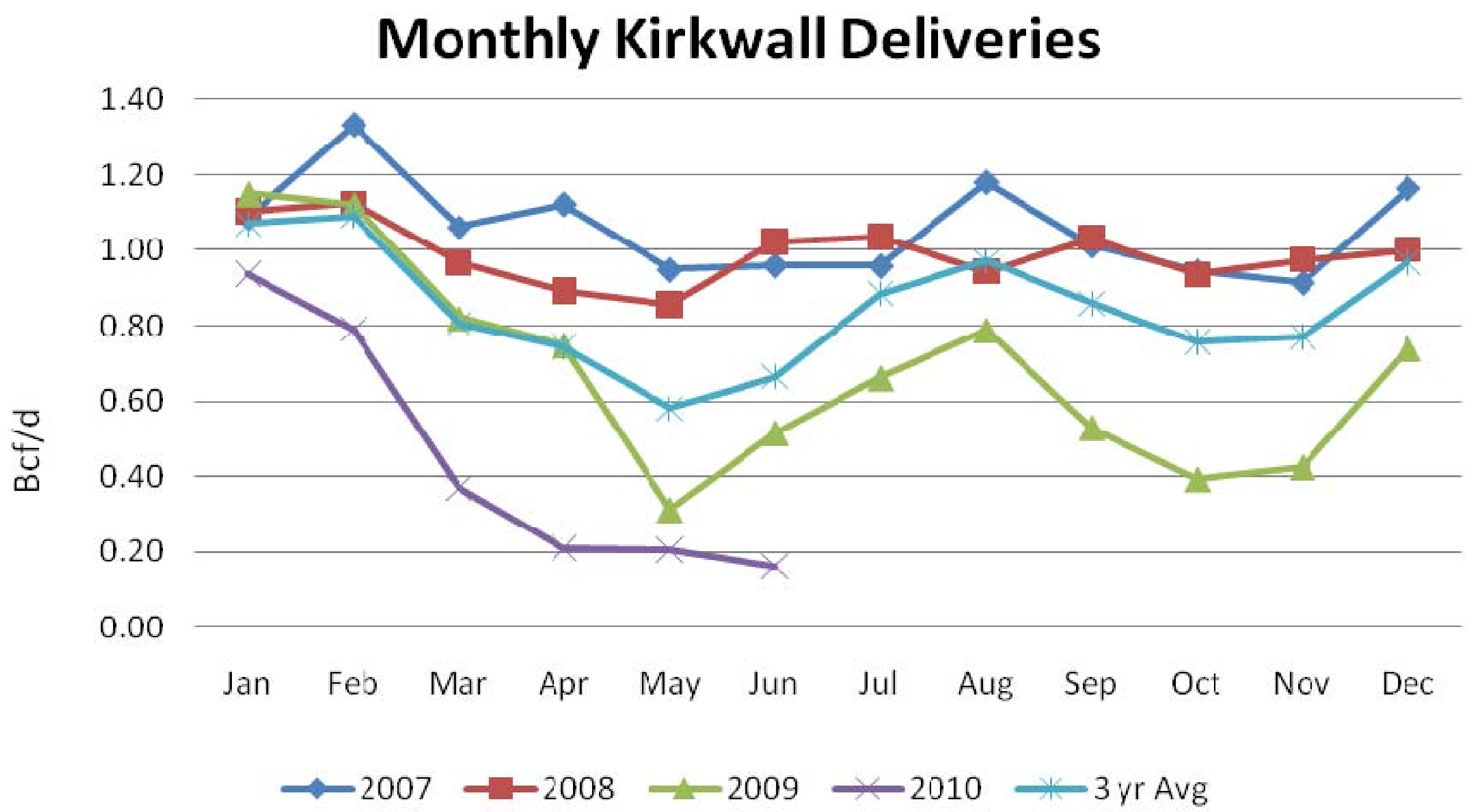
TCPL Long haul Contract Decline



Source: TCPL Index of Customers

* - Estimate based on June CDE Report

US NE Export-Bound Deliveries



- Kirkwall deliveries land at the Niagara/ Chippewa export points to satisfy US Northeast demand
- Down due to
  - US Supply
  - LNG
  - Economy

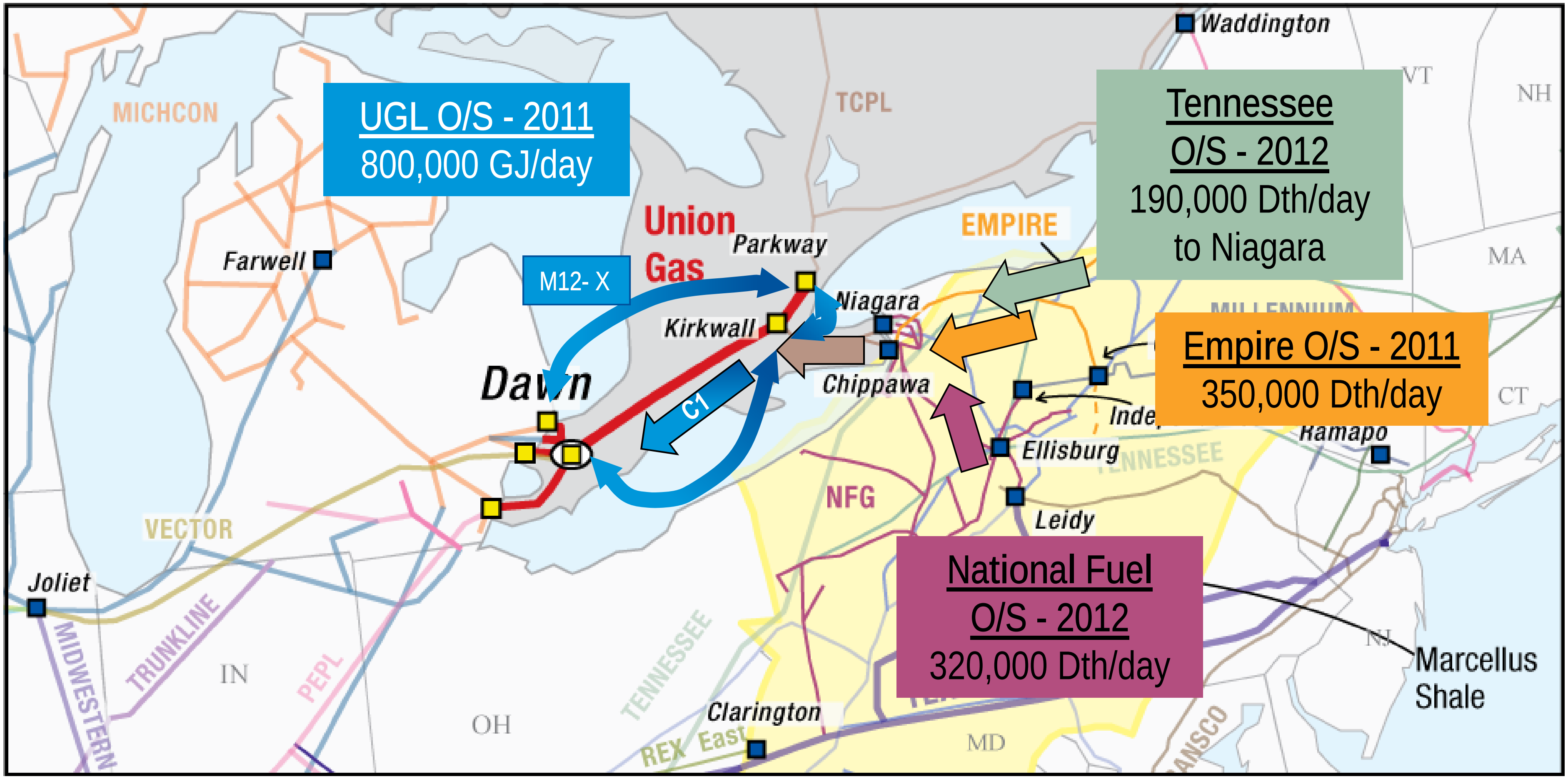
Greater volatility and potential for a sustained decline in Kirkwall deliveries

Market Response To Changing Supply

Impacts to Date

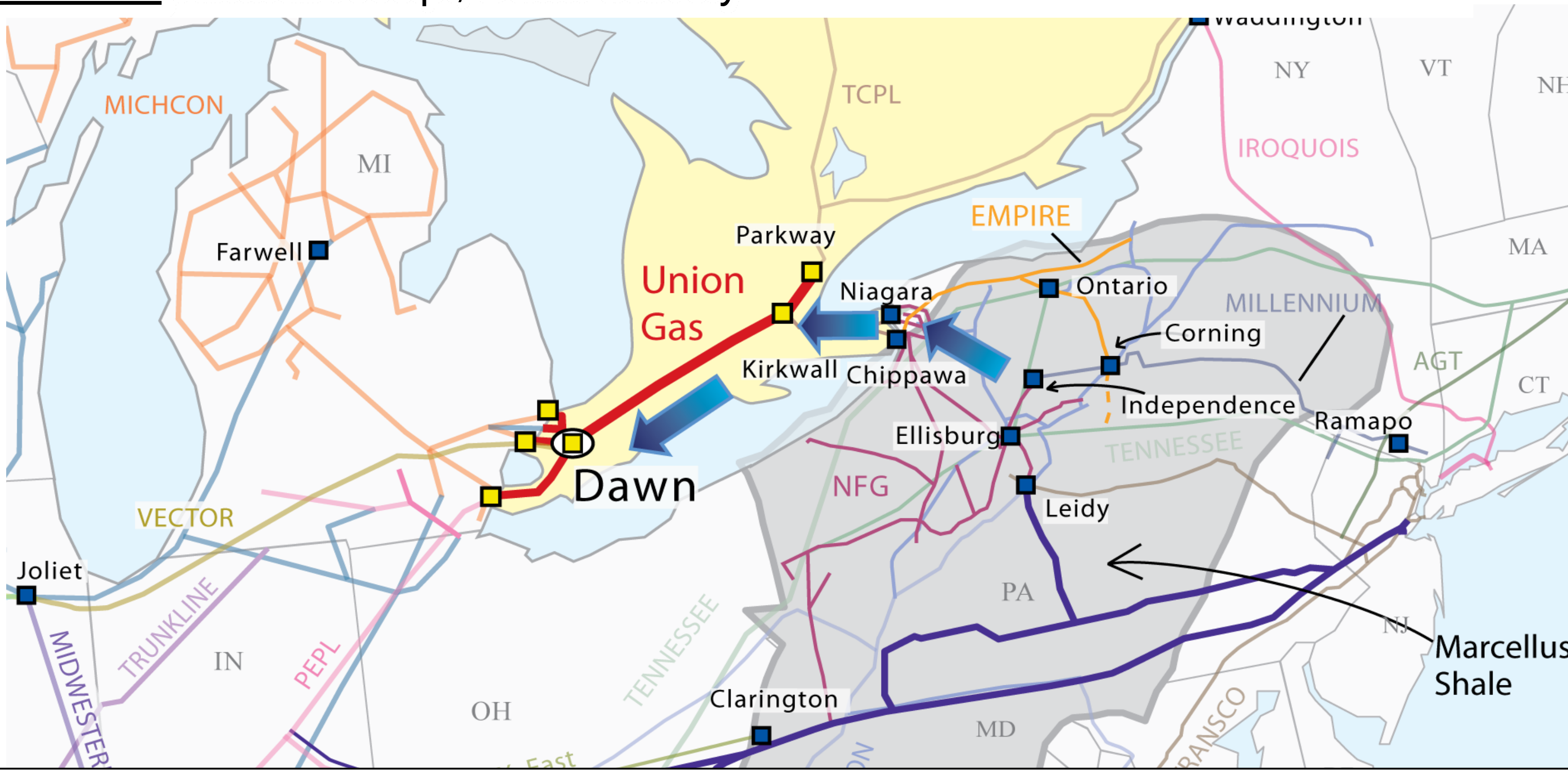
- Declining contracted volumes on TCPL to Dawn
- Declining contracts and throughput on Union’s system to Kirkwall (export volumes to Niagara and Chippewa)
- Market desire to move Marcellus gas back to Dawn
- Market need to reverse flow of gas on some days back into TCPL/Great Lakes

Attracting Marcellus Shale to Dawn



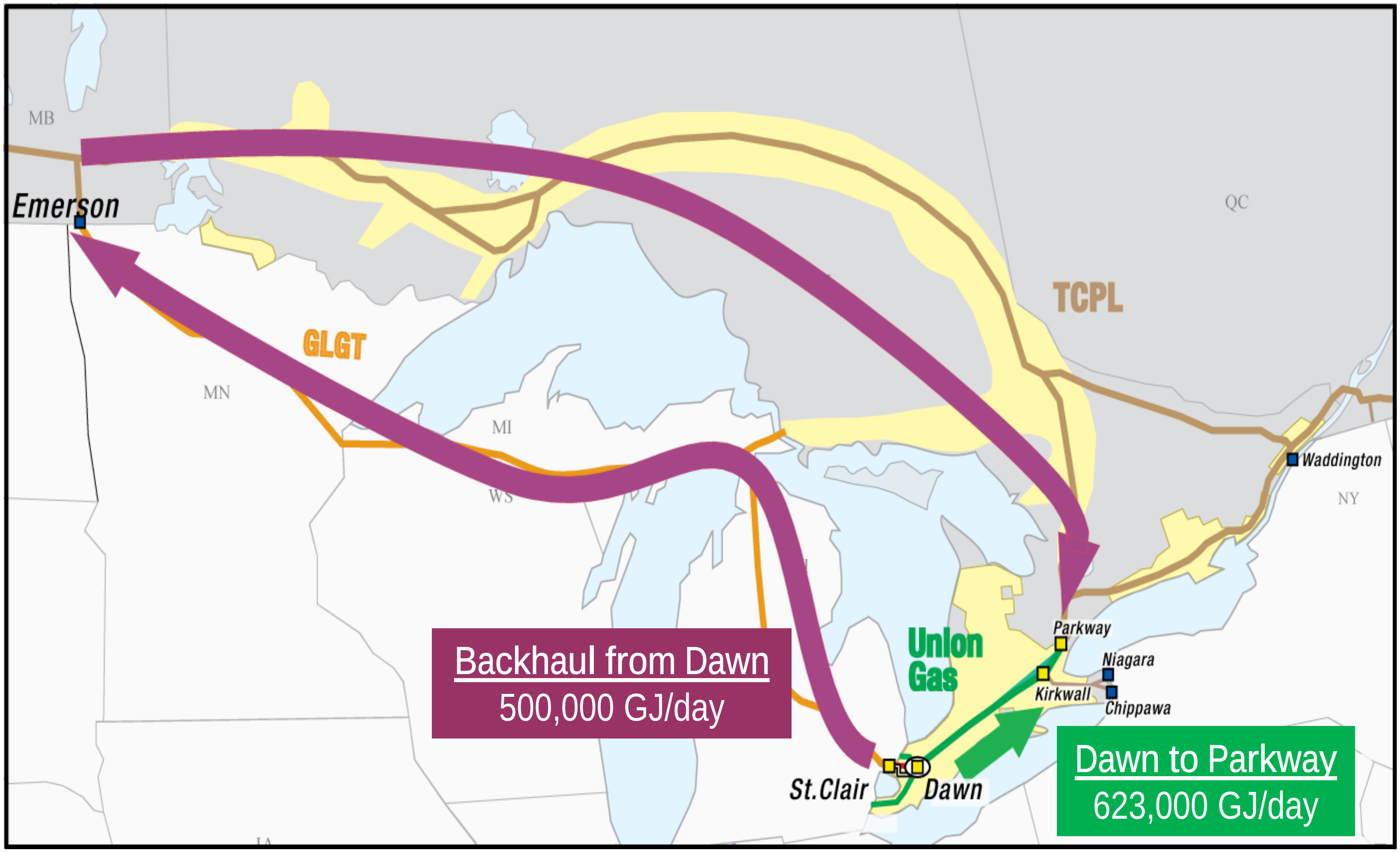
Unions' Response to Market Changes:
M12-X & Kirkwall to Dawn Open Season

M12-X: Firm, bi-directional transport between M12 points (Kirkwall, Parkway, Dawn)
Kirkwall to Dawn: Kirkwall receipt, Dawn delivery



- Offered 800,000 GJ/d of C1 Kirkwall to Dawn & 700,000 GJ/d converted M12-X transportation
- Closed March 9, 2010, services available as of September, 2011
- Successful response from market

TCPL Union Gas Contracts away from Dawn



Status of Changing Flows – West out of Dawn

uniongas

- Union Held an Open season between April 27, 2010 and May 27, 2010
- TCPL has submitted a bid for 500,000 GJ/day for 5 years
- Union has applied to the OEB for a new service to allow for firm backhauls back into TCPL/Great Lakes
- If approved by the OEB, Union would construct the necessary facilities this summer and be prepared to provide the service this coming winter

Conclusion

- Shifting supply dynamics in North America will lead to re-alignment of where customers source their supply.
- Declining WCSB flow to eastern markets and increased U.S. supply in the North East (Marcellus and Rockies) leading to sustainable drop in Kirkwall deliveries and exports at Niagara and Chippewa.
- Growing demand, dominated by power sector.
- Flexible infrastructure and service offerings are needed to match changing supply with growing demand.

Tennessee Gas Pipeline Company
Binding Open Season for Marcellus to Leidy and Niagara Project

Open Season Notice
May 5, 2010 – May 19, 2010

I. General

On February 16, 2009, Tennessee Gas Pipeline Company ("**Tennessee**") initiated a non-binding open season for its MLN Project. Tennessee received significant interest during the open season and has now better defined the scope of work and the associated indicative rates required, including off-system capacity, to provide firm transportation service from Marcellus Shale supply receipt points located along Tennessee's 300 Line between Compressor Stations 313 and 321 ("**Marcellus**") to existing Tennessee interconnects providing access to markets at or near: (1) TransCanada Pipeline at Niagara, and (2) Transco/Texas Eastern at Leidy ("**MLN Project**").

Tennessee hereby announces the commencement of a binding open season ("**Open Season**") for firm transportation service to be made available via the MLN Project. Bids submitted in this Open Season shall be considered a binding offer by bidder. Tennessee will award capacity to interested parties based on the highest NPV per Dth of capacity requested in the Open Season.

Tennessee has entered into binding agreements with two anchor shippers, each subscribing to 50,000 Dth/d of the MLN Project for fifteen year terms ("**Anchor Shippers**"). The agreements serve as qualifying, binding bids in the Open Season. In consideration for their participation in the initial MLN Project open season which led to their early commitments, and for committing to fifteen year terms, Anchor Shippers' binding bids will not be subject to proration in the awarding of MLN Project's capacity. Additionally, for anchoring the MLN Project, Anchor Shippers' negotiated rates will be applicable to certain segmented quantities, point amendments, and secondary points. Tennessee reserves the right to limit the applicability of the applicable negotiated rate to segmented quantities, point amendments, and/or secondary points for all other shippers awarded capacity in this Open Season.

A. MLN Project

The MLN Project will provide incremental firm transportation capacity along two distinct transportation paths ("**Transportation Path**"):

(1) Marcellus to Niagara Path - Marcellus to the delivery point with TransCanada Pipeline at the existing Niagara River interconnection.

(2) Marcellus to Leidy Path – Marcellus to a delivery point at Leidy, Pennsylvania, at existing interconnections between National Fuel, Dominion Transmission, and Transco, and Texas Eastern.

Including the Anchor Shippers, Tennessee anticipates the aggregate amount of firm transportation capacity to be awarded for the MLN Project will be approximately 320,000 Dth/d ("**Project TQ**") allocated among each Transportation Path as follows: Up to 190,000 Dth/d for the Marcellus to Niagara Path and up to 130,000 Dth/d for the Marcellus to Leidy Path ("**Path TQ**"). Service under the MLN Project is anticipated to be available as early as November 1, 2012. Tennessee reserves the right to reject any bid with an in-service date later than November 1, 2013.

Specific availability of capacity depends on anticipated facility modifications and the start and end dates of requested service. Interested parties are encouraged to submit terms that best fit their needs within the parameters set forth above.

B. Open Season Process

This Open Season will commence as of this notice and end at 4:00 p.m. CCT on May 19, 2010 ("**Open Season Period**"). Tennessee will then award and allocate capacity as follows: first, to the Anchor Shippers; and second, among qualifying bidders based upon a highest NPV per Dth basis in accordance with the formula in Tennessee's PASSKEY posting on April 28, 2010, entitled "Open Season Factors – Revised", for open seasons other than open season #761.

After Tennessee has awarded all available capacity, posted the results of the Open Season via its Passkey system, and notified bidders of their award(s), Tennessee will provide each awarded bidder with a pro-forma precedent agreement, provided however, Tennessee reserves the right, upon bidder's written request, to provide bidders submitting a qualifying binding bid with a project precedent agreement ("**PA**") as soon as administratively possible after receipt of such bid. By submitting a qualifying binding bid as described below, a bidder to whom Tennessee awards any of the Project TQ agrees to enter into good faith negotiations to execute a binding and definitive PA consistent with the terms set forth in the awarded bid(s) no later than June 18, 2010. Tennessee reserves the right to extend such deadline in its sole discretion.

To submit a qualifying binding bid within the Open Season Period for the MLN Project, a potential shipper must submit a completed and executed Service Request Form ("**SRF**"), included with this notice, accompanied by sufficient financial information and authorized credit contact for purposes of evaluation of the necessary credit support arrangements related to the request prior to the end of the Open Season Period. Interested bidders should contact Tennessee's Credit Manager, Sharon Kimball at 713-420-2062 or Sharon.Kimball@elpaso.com for any required credit support questions or information. Successful qualifying bidders shall provide and maintain any required credit assurance to Tennessee prior to execution of the PA. Such credit worthiness requirements shall remain in effect during the term of the PA and through the term of the Transportation Service Agreement.

Submit bids to:

Tennessee Gas Pipeline Company
Attention: Preston Troutman
Fax: 713.420.4343
Email: Preston.Troutman@Elpaso.com

II. Service Type, Rates/Fuel, Term

Service for the MLN Project will be provided pursuant to Tennessee's Rate Schedule FT-A, as more fully described in and pursuant to Tennessee's Federal Energy Regulatory Commission ("**FERC**") Gas Tariff.

Shippers will have the choice of an applicable cost-of-service recourse rate or the negotiated rate they elect to bid for each Transportation Path, subject to the minimum negotiated rates specified below and in the SRF.

Tennessee reserves the right to reject any bid with a requested term of less than fifteen years for either Transportation Path.

Marcellus to Niagara Path

The minimum negotiated rate for the Marcellus to Niagara Path, inclusive of any off-system capacity, is a daily reservation rate of $0.29 plus a daily commodity rate of $0.00.

Shippers will be responsible for Tennessee's applicable fuel rates, any off-system capacity related fuel charges, and all applicable surcharges as approved by FERC. The indicative fuel and loss retention percentage, inclusive of any off-system capacity fuel charges, is 3%.

Marcellus to Leidy Path

The minimum negotiated rate for the Marcellus to Leidy Path, inclusive of any off-system capacity, is a daily reservation rate of $0.24 plus a daily commodity rate of $0.00.

Shippers will be responsible for Tennessee's applicable fuel rates, any off-system capacity related fuel charges, and all applicable surcharges as approved by FERC. The indicative fuel and loss retention percentage, inclusive of any off-system capacity fuel charges, is 2.5%.

III. Miscellaneous

To the extent a bidder has any minimum contract quantity below which it does not desire the capacity or any contingencies to its bid, it should so indicate on the SRF. If it is necessary to pro-rate capacity, and bidder does not receive the minimum contract quantity requested, Tennessee will notify bidder and its request will be deemed null and void.

Tennessee reserves the right, upon notice and in its sole discretion, at any time during this Open Season to terminate the Open Season or to extend its Open Season Period. In addition, Tennessee reserves the right to modify this Open Season, including but not limited to, the separation of each Transportation Path into stand-alone projects. Tennessee reserves the right, on a not unduly nondiscriminatory basis, to reject any SRF that, in Tennessee's sole determination, is incomplete, is inconsistent with the terms of this Open Season, contains additions or modifications to the terms of the SRF, is otherwise deficient in any respect (including failure to provided credit support as Tennessee deems necessary), or requests service outside the scope of the MLN Project. Tennessee reserves the right to accept late SRF submissions for unawarded capacity.

Awards of the Project TQ hereunder are subject to Tennessee successfully acquiring off-system capacity and/or reserving capacity sufficient to provide such service and may be limited by the term of such acquired off-system capacity. Furthermore, any extension rights that would otherwise be available to shippers awarded capacity under the Project may be limited by the extension rights that are associated with any off-system capacity acquired by Tennessee in order to provide service under the Project.

This Open Season is subject to Tennessee's FERC Gas Tariff and to all applicable laws, order, rules, and regulations of authorities having jurisdiction. Notwithstanding the foregoing and prior to execution of definitive precedent agreements, Tennessee reserves the right, in its sole discretion, to revise the scope of, or not proceed with, the Project.

If you have any questions regarding this Open Season, please contact Preston Troutman at (713) 420-3022 or Preston.Troutman@ElPaso.com. A copy of the Open Season and the map of the MLN Project are available at: http://elpaso.com/MLNproject.

MLN Project

Service Request Form

Shipper Information: Name: ____________________
Address: ____________________
____

Transportation Path:	**Path TQ:**	**Minimum Contract Quantity** (if prorated)	**Primary Contract Term**	**Start Date**
Marcellus to Niagara	_______ Dth/d	_______ Dth/d	_______ Years	____________
Marcellus to Leidy	_______ Dth/d	_______ Dth/d	_______ Years	____________

Additional Information To Clarify Request

____
____

Transportation Path:	**Minimum Negotiated rate:**	**Recourse Rate:**
Marcellus to Niagara	$0.29 per Dth per day: ☐ (check box)	☐ (check box)
Marcellus to Leidy	$0.24 per Dth per day: ☐ (check box)	☐ (check box)

Additional Information To Clarify Request (including Negotiated Rate if higher than the Minimum Negotiated Rates)

____
____

Primary Points:

Receipt Point(s):	Dth/d
____________________	_______
____________________	_______
____________________	_______

Delivery Point(s):	Dth/d
____________________	_______
____________________	_______
____________________	_______

Additional Information To Clarify Request

____
____

Financial and/or Credit Information: Attached ☐ Sent Separately* ☐ *Delivered to TGP on or before May 17, 2010

Submitted by:

____
Signature of Duly Authorized Representative

Name ______________
Title ______________
Company ______________
Telephone ______________
E-mail ______________

Please return this form to:

Preston Troutman
Tennessee Gas Pipeline Company
1001 Louisiana Street
Houston, TX 77002
Fax: 713-420-4343
Email: Preston.Troutman@ElPaso.com

By completing this binding Service Request Form ("SRF"), subject to Tennessee's acceptance, and Shipper's receipt of notification from Tennessee of quantities of capacity awarded to Shipper, Shipper herby commits to negotiate in good faith with Tennessee with the objective to enter into a binding precedent agreement no later than June 18, 2010. If Shipper does not enter into a precedent agreement by the end of such time period, Tennessee reserves the right to reject Shipper's request for service as set forth in this SRF, and reallocate and award Shipper's capacity to next highest NPV shipper(s).

CANADIAN MAINLINE
NEW CAPACITY OPEN SEASON
January 29, 2010 to March 4, 2010

TransCanada is announcing a New Capacity Open Season (the "Open Season") for firm services on its Canadian Mainline System. The Open Season will start on January 29, 2010 and will end on March 4, 2010 at 8:00 a.m. Calgary time.

NEW CAPACITY OPEN SEASON AND BIDDING PROCEDURE HIGHLIGHTS

- Bids must be received by TransCanada no later than 8:00 a.m. MST on March 4, 2010.

- TransCanada is receiving bids for the following services:
  - Firm Transportation (FT),
  - Storage Transportation Service (STS),
  - Storage Transportation Service – Linked (STS-L),
  - Firm Transportation - Short Notice (FT-SN), and
  - Short Notice Balancing (SNB).

- System Segment Capacity:
  - TransCanada will accept bids (for evaluation and allocation) for all paths on its Canadian Mainline System.

- New Service Commencement Date:

  - Transportation services to commence September 1, 2011 for paths with a receipt point of Niagara or Chippawa and a delivery point of Dawn/Union SWDA, St. Clair, or Kirkwall.
  - Transportation services to commence November 1, 2012 for all other paths on the Canadian Mainline System.

  While it is anticipated that firm transportation will be available to points on the Canadian Mainline as of the transportation services commencement dates listed above, there may be factors that limit capacity or may delay the in-service date including without limitation the following:

  (a) aggregate new requests being greater than anticipated and/or requiring significant quantities of additional capacity; or

  (b) contractual arrangements being required on other pipelines; or

  (c) greater time required for regulatory approvals and/or construction.

- Term:
  - Ten (10) year term for New Capacity bids.

CANADIAN MAINLINE
NEW CAPACITY OPEN SEASON
January 29, 2010 to March 4, 2010

- Conditional Bidding:
  - Canadian Mainline capacity bids can be conditioned on another Canadian Mainline capacity bid.
  - Bidders in this New Capacity Open Season may condition their bid on receiving upstream or downstream transportation on other pipelines. Provided however, Bidder must elect to withdraw its bid or waive the condition on or before April 30, 2010

- Toll:
  - All capacity is offered at the approved Mainline Toll. The current toll can be found at NEB Approved Mainline Toll

- Minimum Acceptable Quantity:
  - May be specified by Bidder in the event that prorating of capacity is necessary.

- Upon the close of the Open Season, TransCanada will proceed with accommodating Accepted Bids in the most effective manner.

- Please be advised that TransCanada has initiated a rate and service design review to enhance the competitiveness of its short & long haul rates and services which may result in changes being proposed to the current rate structure.

- Please refer to the Transportation Access Procedures (TAPs) for additional terms and conditions and information

HOW TO BID AND NOTIFICATION

- Bidders must submit a completed bid via the Paper Version or Electronic Version and fax to TransCanada's Mainline Contracting Department at (403) 920-2343.
- Bids must be received by 8:00 a.m. MST on March 4, 2010.
- All bids received will be evaluated together for allocation purposes.
- Notification of successful New Capacity bids will be within fifteen (15) banking days.

OPEN SEASON DEPOSIT INFORMATION & PROCEDURE

Successful Bidders who currently hold a contract with TransCanada are not required to provide a deposit with each bid, although failure to accept awarded capacity will result in a fee charged by TransCanada to Bidder's existing transportation account.

Successful Bidders who do not currently hold a contract with TransCanada shall be required to provide a deposit, within two (2) banking days of the close of the New Capacity Open Season, with each bid provided to TransCanada, equal to the lesser of:

- One (1) month demand charges for the maximum capacity set out on the Bid Form, calculated based on the tolls in place when the Bid Form was submitted; or
- $10,000 (Cdn).
- The deposit can be provided by either wire transfer or cheque. Please contact your Mainline Customer Account Manager to obtain the TransCanada Bank Account information for wire transfers or to obtain the address for mailing cheques.

CANADIAN MAINLINE
NEW CAPACITY OPEN SEASON
January 29, 2010 to March 4, 2010

TransCanada
In business to deliver

SUPPORTING DOCUMENTATION FOR NEW SERVICES

For New Capacity bids, Bidders must provide the supporting documentation for their requested services as set out in the National Energy Board's ("NEB") Filing Manual in order to qualify as acceptable bids under (TAPs). This information must be provided to TransCanada within 5 banking days from the date the successful bidder receives a precedent agreement from TransCanada. Bidders are strongly encouraged to contact one of the TransCanada staff listed below to discuss filing requirements. Such information will form the basis of TransCanada's NEB application.

Information provided by bidders will be on a confidential basis up to the time of a regulatory application to the NEB; any specific requirements for confidentiality will be addressed on an individual basis.

QUESTIONS

If you have any questions about this New Capacity Open Season or any other questions related to services on the Canadian Mainline, please contact your Customer Account Manager.

Calgary
Gordon Betts (403) 920-6834
Mike Mazier (403) 920-2651

Toronto
Amelia Cheung (416) 869-2115
Lisa DeAbreu (416) 869-2171
Todd Anderson (416) 869-2118

Completed bids must be faxed by 8:00 a.m. MST on March 4, 2010 to:

Mainline Contracting Fax Number (403) 920-2343

CANADIAN MAINLINE
NEW CAPACITY OPEN SEASON
January 29, 2010 to March 4, 2010

TransCanada
In business to deliver

APPENDIX

LINKS to Additional Information:

- New Capacity Open Season Bid Form (Paper Version)
- New Capacity Open Season Bid Form (Electronic Version)
- Mainline Tariffs: Toll Schedules & Pro Forma Contracts
- TAPs: Transportation Access Procedure
- 2010 Mainline Tolls - Final 2010
- Index of Customers showing recent contracts and renewals
- Other TransCanada Information: **www.transcanada.com/Customer_Express**

GST Procedures for FT, FT-SN, STS, STS-L – FOR EXPORT POINTS ONLY

Pursuant to the Excise Tax Act, Canadian natural gas transporters are required to invoice the Goods and Services Tax (GST) on all services. GST on transportation charges for gas that is consumed in Canada is set at 5%. GST on transportation charges for gas that is consumed in the United States may qualify for zero-rating (0% GST).

For gas that is transported to export points for consumption in the United States, shippers may zero-rate GST on the associated transportation demand, commodity and pressure charges by making a Declaration on the nomination line in NrG Highway.

Shippers may also zero-rate GST on Unutilized Demand Charges (UDC) under firm contracts that have an export point as the primary delivery point in the contract. Note that UDC may only be zero-rated if the firm contract is intended for transportation of gas to, and consumption of gas in, the United States. UDC zero-rating for eligible firm contracts can be obtained by providing TransCanada with an executed Contract Declaration. A *proforma* Contract Declaration Form is available at the following link:

FT GST Declaration

Some key points to note regarding Contract Declarations to zero-rate GST on UDC under firm export Contracts:

- Contract Declarations may only take effect on the first day of a month.
- A Contract Declaration cannot be applied retroactively.
- A single Contract Declaration form is used for all of a shipper's firm export contracts eligible for zero-rating of UDC.

Please keep in mind that, even if 5% GST is applied on your transportation invoice, businesses will typically be eligible for rebates of GST from the Canadian Revenue Agency (CRA). Please refer to the following website for additional information on GST regulations and rebates:

http://www.cra-arc.gc.ca/tx/bsnss/tpcs/gst-tps/gnrl/txbl/trnsprtn/menu-eng.html

For more information on TransCanada's GST practices, please contact Vincent Thebault at 403-920-5840 or vincent_thebault@transcanada.com.

Notice of Open Season 159

National Fuel SUPPLY CORPORATION

REVISED OS159 - "Northern Access" Expansion Project
Firm Long Term Transportation Capacity for Marcellus Shale Production to Interconnects with TransCanada (Niagara) and Tennessee (Zone 5)

STATUS IS: **CLOSED**

POSTED: 1/12/2010
TERM: 1/12/2010 - 2/17/2010

Results for Open Season 159 were strong with more than 1.6 Bcf of transportation requests received. National Fuel is in the process of determining the specific amount of capacity to be awarded and will then tender agreements to the successful bidders.

4/26/10
National Fuel has extended the deadline for the receipt of Precedent Agreements so that parties may adequately address the latest NSLL cost information.

3/19/10
Update on Bid Award Process, under the terms of this Open Season:

- National Fuel has awarded 320,000 dth/day of firm transportation capacity in OS159 and is negotiating agreements with successful bidders.

2/16/10
Clarification on Bid Award Process, under the terms of this Open Season:

- Bidders may submit more than one bid. If a bidder is awarded capacity under more than one request, however, the bidder's rejection of any awarded capacity will result in the termination of any lower-value capacity award(s).
- Once capacity has been awarded to a bidder with respect to a particular bid, the bidder must sign a precedent agreement for the awarded capacity within thirty days of receipt or its award will be terminated. The bidder cannot elect to sign a precedent agreement for a reduced quantity.
- If it is necessary to prorate capacity among successful bidders, agreements will be sent to each successful bidder reflecting such proration. The agreements will provide for a range of quantities between the prorated (awarded) quantities and the requested quantities. The final contract quantity will be within this range and will be determined by the capacity ultimately subscribed by all successful bidders.

2/12/10
Please Note: The specific amount of awarded capacity may be less than 450,000 dth/d, based on the requested receipt and delivery point combinations and an ongong review of NY market no-notice obligations.

National Fuel Gas Supply Corporation

Notice of Open Season – REVISED OS159 "Northern Access" Expansion Project

Firm Long Term Transportation Capacity for Marcellus Shale Production to Interconnects with TransCanada (Niagara) and Tennessee (Zone 5)

INTRODUCTION:
National Fuel Gas Supply Corporation ("National Fuel") is pleased to announce the commencement of an Open Season for firm transportation capacity from existing interconnects at Leidy (Transco, TETCO), Wharton (Transco), Ellisburg (TGP, DTI), and Independence (Millennium) to Niagara (TransCanada, TGP), East Aurora (TGP Zone 5), Marilla (DTI), and Pendleton (Empire).

The Northern Access project will enable Marcellus shale and conventional production gas to flow north to eastern Canada and the liquid markets at Niagara and Dawn. The Northern Access expansion project could provide up to 450,000 dth/day of incremental firm transportation capacity.

PROJECT FACILITIES:
The project facilities include new bi-directional metering at Niagara and East Aurora, incremental compression at East Aurora, Rose Lake, and Pendleton, odorization enhancements, and miscellaneous station piping improvements. Facilities design and other receipt and delivery point enhancements will be considered based on Open Season requests.

PROJECT CONCEPT MAP:

RECEIPT POINTS:
Project primary firm receipt point options include:

- Leidy (Transco)
- Leidy (TETCO)
- Wharton (Transco)
- Roselake (TGP)
- Andrews Settlement (TGP)
- Ellisburg (DTI)
- Independence (Millennium)

Other receipt points may be available - bidders are encouraged to contact a National Fuel marketing representative regarding availability.

National Fuel will accept bids that propose existing and/or proposed direct interconnect receipt points, provided that the proposed Northern Access expansion project facilities can provide the transportation path requested.

In this Open Season, bidders may also propose receipt points that require the West-to-East Phase I and/or Phase II expansion capacity offered in National Fuel's Binding Open Season 154. In order for such bidders to be eligible to bid in this Open Season, they must have signed Precedent Agreements pursuant to Open Season 154, OR prior to the closing date of this Open Season have submitted a Service Request Form for capacity on either West-to-East Phase I or Phase II.

DELIVERY POINTS:
Project primary firm delivery point options include:

- Niagara (TransCanada)
- Niagara (TGP)
- East Aurora (TGP Zone 5)
- Pendleton (Empire) *
- Marilla (DTI)
- National Fuel Gas Distribution (New York only)

*Availability of the Pendleton delivery point is contingent on adequate incremental Firm Storage Transportation ("FST") market support for the required delivery point facilities.

Other delivery points may be available - bidders are encouraged to contact a National Fuel marketing representative regarding availability.

FT and FST shippers will have access to all National Fuel points on a secondary basis.

OPEN SEASON TIME FRAME:
Commences January 12, 2010 and concludes on February 17, 2010 at 11:00 am EST.

TERM:
National Fuel reserves the right to reject bids with a proposed term of less than ten (10) years.

RATES:
National Fuel expects to provide transportation service under National Fuel's existing Firm Transportation ("FT') (or FST in the case of Pendleton deliveries) rate schedule.

Listed below are the current maximum tariff rates for FT service:

FT Rate Component	Maximum Rate

Reservation Charge	$3.3612 per Dth/day
Commodity Charge	$0.0063 per Dth
FERC ACA Commodity Surcharge	$0.0019 per Dth
Fuel and Company Use/LAUF	1.4%
100% Load Factor Rate	$0.1168 per Dth

- Reservation Charge (monthly, applied to contract MDTQ)
- Commodity Charge (daily, applied to Dth quantity transported)
- FERC ACA Commodity Surcharge (daily, applied to Dth quantity transported)
- Fuel Loss and Company Use (Delivered volumes are receipt volumes less 1.4% fuel and company use retention and transportation LAUF retention)
- 100% Load Factor Rate (excluding ACA surcharges)

National Fuel will reserve the right to propose incremental rates in Precedent Agreements if warranted by the project economics.

COMMENCEMENT OF SERVICE:

Transportation service for the project described in this offer will be available for commencement upon completion of facilities, which could be as soon as late 2011, although the regulatory approval process for the required facilities could dictate a 2012 in-service date.

BID FORMAT AND AWARD PROCESS:

During the Open Season period, National Fuel will accept requests for service commencing as early as November 1, 2011. For bids made in conjunction with capacity to be obtained pursuant to Open Season 154 (West-to-East Phases I and II), the applicable start date for bid awarding purposes shall be November 1, 2011 (Phase I shippers) and November 1, 2012 (Phase II shippers).
Requests for rate discounts will not be considered during this Open Season. The maximum tariff FT rate described above shall be applicable in the evaluation of all bids - except those made in conjunction with Open Season 154 as described above, which shall be evaluated using a estimated monthly reservation rate of $2.4300. Shippers may request all or part of the advertised project capacity. All acceptable requests will be ranked and capacity awarded based on the highest NPV of the reservation charge revenues, per unit of capacity (Dth/day) requested. The NPV calculation will incorporate length of contract term and will utilize a monthly rate of 0.8% (9.6% annually) for discounting purposes. In the event that multiple shippers submit requests that are equivalent in value and term, the available capacity shall be prorated to those shippers based on the quantities requested.

If National Fuel determines that the market interest is sufficient to support the system expansion as described, then National Fuel will proceed to obtain the required customer agreements. Although this is a non-binding Open Season, National Fuel intends to negotiate Precedent Agreements with winning bidders that will obligate National Fuel and the bidder to execute a service agreement upon satisfaction of certain conditions precedent. If all capacity created by the proposed expansion is not initially subscribed to Open Season bidders, National Fuel reserves the right to market this capacity post-Open Season without holding an additional Open Season.
National Fuel reserves the right to determine the economic viability of any required expansion(s).

An interstate pipeline interested in acquiring Northern Access capacity may propose to negotiate a capacity lease agreement with a lease payment based on the maximum tariff rates shown above. National Fuel will consider including a provision in a capacity lease making the lease contingent on regulatory approvals required by the requesting pipeline to utilize the leased capacity.

CREDIT REQUIREMENTS:
Shippers will be required to demonstrate creditworthiness or provide a credit alternative acceptable to National Fuel.

AGREEMENTS:
Successful bidders will be required to execute and return a Precedent Agreement within 30 days of receipt.

OPEN SEASON BID PROCESS:
All Open Season requests must be submitted using a Service Request Form either by completing a Service Request Form online, or by downloading the PDF version from our website and submitting the completed form by mail or fax to:

National Fuel Gas Supply Corporation
6363 Main Street
Williamsville, NY 14221

Fax – (716) 857-7310

Inquiries can be directed to any one of the following Marketing Representatives:

Joe Kolis	(716) 857-7520
Terry Falsone	(716) 857-7602
George Linder	(716) 857-7105
Genevieve Dispenza	(716) 857-6945

The results of this Open Season will be posted on National Fuel's web site, http://www.nationalfuelgas.com.

Contact Our Marketing Department

Return to Open Season Index

NATIONAL FUEL GAS SUPPLY CORPORATION

Service Request Form

Interstate Marketing Department
6363 Main Street
Williamsville, New York 14221
Phone: (716) 857-7740 / Fax: (716) 857-7310

Important Note: To request only a Master Release Contract or Title Transfer Tracking Contract, please fill in Nos. 1-5, and 10-15.

1. Please provide information about your Company:

____
Complete Legal Name of "Shipper"

hereby requests service from National Fuel Gas Supply Corporation ("National") and consequently provides the following information in connection with this request:

____________________ / ____________________
Type of Legal Entity — State of Incorporation or Organization

DUNS# ___ ___ - ___ ___ ___ - ___ ___ ___ ___

2. Please provide contact information for Business correspondence:

____
Name

____
Address — City — State & Zip Code

( ) - / ( ) -
Telephone # — Fax #

Please provide contact information for Invoicing purposes (if different from above):

____
Name

____
Address — City — State & Zip Code

( ) - / ( ) -
Telephone # — Fax #

3. Please indicate Service Type(s):

Master Release Contract (pre-approved bidder status)
☐ Transportation ☐ Both
☐ Storage

☐ **Title Transfer Tracking Service**

Firm Transportation Service
☐ FT Firm Transportation
☐ EFT Enhanced Firm Transportation
☐ FST Firm Storage Transportation

Firm Storage Service
☐ FSS Firm Storage
☐ ESS Enhanced Storage

Interruptible Services
☐ IAS Interruptible Advance Service
☐ IT Interruptible Transportation
☐ ISS Interruptible Storage

Hub Services
☐ IR-1 Imbalance Resolution
☐ IR-2 Imbalance Resolution
☐ W-1 Wheeling
☐ P-1 Parking
☐ P-2 Parking

4. Please check one
   ☐ New Service
   ☐ Modification of Existing Service – Please Describe Below:

   ____

   ____

5. Please provide Service Term information:

   A. Date service is proposed to commence: ______________________________

   Term of Service: _____Year(s) _____Month(s)

   For Master Release Shippers only:

   B. Maximum Daily Quantity to be acquired via release: ______________________________Dth.

   Maximum Storage Capacity to be acquired via release: ______________________________Dth.

6. Are additional or new facilities required to receive or deliver gas for the service requested herein? If yes, please describe:

   ____

7. Please provide appropriate data:

   The maximum daily quantity to be transported is ______________________________Dth.

   The maximum daily quantity to be injected into storage is ______________________________Dth.

   The maximum daily quantity to be withdrawn from storage is ______________________________Dth.

   The total capacity in storage is ______________________________Dth.

   The total maximum advance quantity is ______________________________Dth.

8. Name and description of receipt point(s) into National's system to be delivered by Shipper:

Firm Transportation Service
FT EFT FST

____

____

Firm Storage Service
FSS : **NFSTOR**
ESS : **NFSTOR**

Interruptible Services
IAS : **All System Points**
IT : **All System Points**
ISS : **NFISS**

Hub Services
IR-1 : **Hub Points** P-1 : **Hub Points**
IR-2 : **Hub Points** P-2 : **Hub Points**
W-1 : **Hub Points**

9. Name and description of delivery point(s) where National will deliver the gas for Shipper:

Firm Transportation Service
FT EFT FST

____

____

Firm Storage Service
FSS : **NFSTOR**
ESS : **NFSTOR**

Interruptible Services
IAS : **All System Points**
IT : **All System Points**
ISS : **NFISS**

Hub Services
IR-1 : **Hub Points** P-1 : **Hub Points**
IR-2 : **Hub Points** P-2 : **Hub Points**
W-1 : **Hub Points**

10. Credit Evaluation: Shipper has provided National with a copy of its most recent audited financial information, annual report, Form 10K, or a copy of the most recent Federal income tax return and a complete list of its parent, subsidiary companies, and affiliates. Yes______ No_______

    If "No" or if above financial statements do not meet National's credit worthiness standards, Shipper agrees to provide an alternative demonstration of credit worthiness.

    Contact for credit purposes:

    Name: ________________________ E-mail Address: ________________________

    Name: ________________________ E-mail Address: ________________________

    Shipper should provide the names and e-mail addresses of up to two representatives authorized to receive notices regarding its creditworthiness.

    National's contact is the Credit, Collections and receivables Management Dept. at CCRMSupply@natfuel.com.

11. Regulatory Contact Information: Please provide a name and e-mail address to receive service of tariff filings. Shipper must provide an email address to receive service of tariff filings.

    Name: ________________________ E-mail Address: ________________________

12. Shipper certifies that all necessary upstream and downstream arrangements will be in place on the date service is to commence, and that Shipper will have good title or the good right to deliver the gas to be delivered to National. **Please initial:**__________

13. Shipper agrees to pay National's currently effective rate applicable to this service unless otherwise agreed upon. **Please initial:**__________

14. If Shipper is requesting service under Section 311(a) of the NGPA, please attach a statement demonstrating Shipper's eligibility for service. **Please initial if Yes:**___

15. Service Request submitted by:

    Name: ______________________________________

    Title: ______________________________________

    Date: ______________________________________

    Phone: ______________________________________

16. Please return via fax or mail to:

    National Fuel Gas Supply Corporation
    Interstate Marketing Department
    6363 Main Street
    Williamsville, New York 14221
    Fax #: 716-857-7310

Notice of Open Season 6

OS006 REVISED - Firm Long-term Transportation Capacity to Chippawa and Tennessee Gas Pipeline (Zone 5) from New and Existing Appalachian Producing Areas

empire pipeline
A National Fuel Gas Company

STATUS IS: **CLOSED**

POSTED: 10/1/2009
TERM:11/18/2009 - 11/25/2009

6/4/10
Revised Open Season 006 has closed and Empire has awarded two shippers a total of 350,000 Dth/d of Firm Long-term Transportation Service from the Marcellus shale gas production area of Tioga County, Pennsylvania (near Jackson Township) to an interconnection with TransCanada Pipeline at Chippawa. Empire has executed a Precedent Agreements with East Resources, Inc. that contains a 10-year firm commitment for 200,000 Dth/day. Empire has also executed a Precedent Agreement with Talisman Energy USA, Inc. that contains a 10-year commitment for 150,000 Dth/day. With these commitments, Empire has fully subscribed the available capacity resulting from the planned facilities expansion. These contracts represent all capacity from this open season.

1/19/10
Revised Open Season 006 concluded on November 25th, 2009. Empire received a number of firm transportation service requests that in total could be sufficient for the continued development of the project. Since then, Empire has completed negotiations with one shipper and the parties have executed a Precedent Agreement for 200,000 dth/d of firm transportation capacity. Empire continues to negotiate the terms of the Precedent Agreements with other shippers that were allocated capacity through this Open Season, and extended the date for execution of Precedent Agreements by those shippers to February 4, 2010.

10/23/09
Open Season 006 concluded on October 23, 2009. Empire received a number of firm transportation service requests that in total could be sufficient for the continued development of the project. Empire continues to negotiate the terms of the Precedent Agreements with the shippers that were allocated capacity through this Open Season and extended the date for execution of the Precedent Agreements by those shippers to January 19, 2010.

EMPIRE PIPELINE, INC.

NOTICE OF OPEN SEASON

OS006 REVISED – Firm Long-term Transportation Capacity to Chippawa and Tennessee Gas Pipeline (Zone 5) from New and Existing Appalachian Producing Areas

Introduction:
Empire Pipeline, Inc. ("Empire") is pleased to announce the commencement of a revised Open Season for at least 300,000 Dth/day of incremental firm transportation capacity from new interconnection(s) in the Marcellus fairway in Tioga County, Pennsylvania to its existing interconnections with Millennium Pipeline at Corning, New York and TransCanada Pipeline at Chippawa, as well as to its newly planned interconnection with Tennessee Gas Pipeline (Zone 5) in Ontario County, NY.

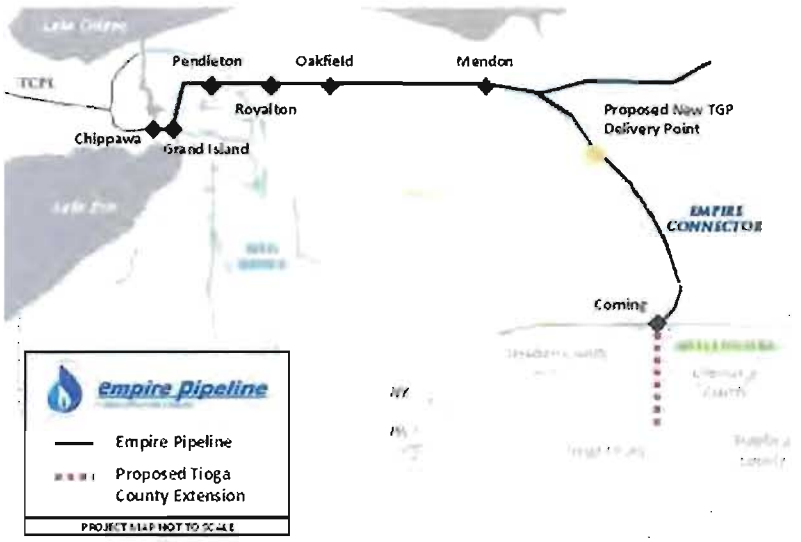
The facilities that would provide the incremental firm transportation capacity include a new pipeline from the Marcellus shale producing area of Tioga County, Pennsylvania to Empire's existing system at Corning, New York, along with several enhancements to the Empire system. Depending on shipper requests, Empire may propose to expand its firm transportation capacity by more than 300,000 Dth/day. Please refer to the "Project Facilities" section below and the OS006 Project Map for specifics.

Project Facilities:
Empire proposes to construct a pipeline from a shipper-specified point located in or near Jackson township in Tioga County, PA to Empire's existing system at Corning, NY (the "Tioga County Extension"). The proposed 16-mile pipeline is anticipated to be 24 inches in diameter and would provide firm transportation capacity of at least 300,000 Dth/day. In addition, Empire proposes to construct an interconnection with Tennessee Gas Pipeline's 200 Line (Zone 5) at a point in Ontario County, NY. Empire would also replace approximately 1.3 miles of existing pipeline near Victor, NY with new pipe rated at a higher maximum allowable operating pressure. Modifications may also occur at the interconnection facilities with Millennium Pipeline at Corning, NY and also at the TransCanada Pipeline interconnection at Chippawa to allow for bi-directional flow. Also, if needed, Empire would modify its' existing Oakfield compressor

station. Empire anticipates that the above facilities would be placed in-service on or after September 1, 2011.

Empire reserves the right to tailor the facilities expansion design based on the specific requests submitted.

Project Map:



Rates:
In its FERC filing(s) for this expansion project, Empire plans to propose that the Empire Connector maximum recourse rates be applicable to the firm transportation service provided by this project including transportation service from secondary receipt points and/or to secondary delivery points. Empire expects that shippers will also be subject to Empire's system fuel and company use retention, loss retention and applicable surcharges. Empire plans to seek a FERC predetermination authorizing roll-in of the cost of service associated with these project facilities into the Empire Connector rates, in a future rate proceeding.

The year-round Empire Connector maximum recourse rate is $9.9664/Dth. This rate is equivalent to a 100% load factor unit rate of $0.3277/Dth. Detailed rate information can be found in Empire's tariff.

Empire will accept bids in which shippers propose a discount to this maximum recourse rate provided that the requested discount is not less than $0.2300/Dth (expressed as a 100% load factor unit rate). A shipper's proposed discount will also apply to secondary "on the path" delivery points but the proposed discount will not apply to secondary delivery points that are not "on the path" (see the "Delivery Points" section below for points that are "on the path"). Empire will not accept any discounted rate bids that fall below this minimum amount.

Receipt Points:
The project's firm receipt points will include: (i) new producer interconnection(s) located along the existing Empire Connector or the proposed Tioga County Extension and (ii) the interconnection with Millennium Pipeline at Corning, NY. Bidders are encouraged to refer to the OS 006 Project Map, or contact the Empire Marketing Representatives for more information.

If bidder's Open Season 006 capacity request exceeds 50,000 dth/day for the required contract term, and one or more new interconnect points along the Empire Connector or on the proposed Tioga County Extension pipeline is required for receipt of shipper's gas by Empire, Empire will waive the interconnect cost for one such new interconnect point.

Delivery Points:
The project's firm delivery points include: (i) the interconnection with TransCanada Pipeline at Chippawa, (ii) the interconnection with Millennium Pipeline at Corning, NY, (iii) the proposed new interconnection with Tennessee Gas Pipeline Line 200 (Zone 5) in Ontario County, NY, and (iv) Empire's existing

"on the path" points of Mendon, Oakfield, Royalton, Pendleton and Grand Island.

Based on shippers' requests, Empire would determine the sizing of facilities and the resulting delivery capability at the interconnection points with TransCanada, Millennium and Tennessee Gas Pipeline. Existing "on-the-path" delivery points have meter capacity limitations, contact the Empire Marketing Representatives for more information.

Maximum Daily Quantity:
Shippers may request all or part of the advertised project capacity and will specify their desired amount on the bid form as the requested Maximum Daily Quantity ("MDQ", expressed in Dth/day). As part of the Open Season request, Empire will allow shippers the option to specify on their bid form a lower MDQ during the first eighteen (18) months of the transportation service, provided that the initial MDQ is not less than 40% of the requested MDQ and provided that the initial MDQ will then be increased every six (6) months by an amount equal to one-third (1/3) of the difference between the requested MDQ and the initial MDQ, such that the requested MDQ is achieved by the 18th month of service. A proposed faster increase in MDQ will also be acceptable.

Term:
Empire will require a minimum ten (10) year term.

Anchor Shipper Provisions:
For shippers with a contract MDQ of at least 100,000 Dth/day, Empire will provide the following additional terms:

1. If before the date the new facilities are placed in service, Empire enters into a Comparable Agreement (as defined below) for service with a Comparable Shipper (as defined below) that provides for any discounted rate terms that are more favorable than the terms in the shipper's Service Agreement, Empire would offer the shipper the same discounted rate terms with respect to the portion of shipper's MDTQ equal to the MDTQ of the Comparable Shipper under the Comparable Agreement for the term of the discounted rates in the Comparable Agreement.

   Comparable Agreement shall mean any firm transportation service agreement that (i) is entered into before the date the new facilities are placed in service, and (ii) specifies a primary receipt of a producer interconnection along the new Tioga County Extension pipeline and a primary delivery point of Chippawa or other delivery points that are "on the path" from the shipper's primary receipt point along the Tioga County Extension to Chippawa, and (iii) specifies a primary term of greater than three (3) years. Comparable Shipper shall mean a shipper that executes a Comparable Agreement.

   This provision shall apply only to agreements that Empire enters into for the initial capacity (as described in the planned FERC 7(c) application for the Tioga County Extension) created by the new facilities, as opposed to any subsequent expansions.

2. During the term of the Service Agreement, should the shipper request and secure a change in primary receipt point in accordance with Empire's FERC gas tariff (in particular the Firm Transportation tariff section 1.4), then Empire would apply the requested discounted rate only to the new primary receipt points that meet the following conditions: (i) the new point is a producer interconnection point behind which the shipper has equity production; and (ii) the new producer interconnection points are located along the Tioga County Extension and/or the Empire Connector.

   In addition, for an amount not to exceed one-eighth (1/8) of the shipper's MDQ, the discounted rate would apply to a primary receipt point change to the Corning interconnection with Millennium Pipeline.

Ranking Bids and Awarding Capacity:
Shippers may request all or part of the advertised project capacity. Empire will determine the specific amount of capacity to be awarded, taking into account the pipeline system hydraulics associated with specific receipt point requests. Bids

will be ranked according to the net present value (NPV) of the reservation charge revenues per unit of capacity (Dth/day) requested. The NPV calculation will incorporate length of contract term and will utilize a monthly rate of 0.8% (9.6% annually) for discounting purposes.

A shipper who submitted a conforming transportation service request in response to Empire's original Open Season 006, is not required to participate in this revised Open Season 006, and its original bid will receive first priority, prior to NPV calculations in this revised Open Season 006. Such shippers may, however, elect to submit conforming requests in this revised Open Season 006 in lieu of or in addition to their original requests.

In the event that Empire receives two or more bids of equal NPV, per unit of capacity, the bid with the shortest term will be deemed the best bid. Subject to other conditions in this posting, a ratable allocation, based on the quantities requested, shall be made among shippers that submit bids that are equal with respect to both NPV and term.

If it is necessary to ratably allocate the capacity among successful bidders, service agreements will be sent to each successful bidder reflecting such allocation. These service agreements will provide for a range of quantities between the ratable allocation quantities and the requested quantities. The contract quantity will be within this range and will be determined by the capacity subscribed by all successful bidders under executed service agreements.

Open Season Dates:
This Open Season commences at 12:00 noon (EST) on Wednesday November 18, 2009 and will close at 12:00 noon (EST) on Wednesday November 25, 2009.

Open Season Documents and Bid Process:
All Open Season requests must be submitted on a Bid Response Form (Bid Revised OS006) and must be accompanied by a completed Transportation Service Request Form. A copy of these forms can be obtained by clicking on these links:

Bid Response Form (Bid Revised OS006)

Transportation Service Request Form

Forms may also be obtained by calling Empire's Marketing Department at (716) 857-7763.

The completed forms should be submitted to Empire before the close of the Open Season. Submissions may be sent by mail or fax as listed below:

Empire Pipeline, Inc.
Marketing Department
6363 Main Street
Williamsville, NY 14221

Phone: (716) 857-7763
Fax: (716) 857-7648

Within 30 days of the award of capacity, Shippers are expected to execute a Precedent Agreement including acceptable Creditworthiness and Credit Support terms.

For additional information, please contact Empire's Marketing Representatives at:

Sharon Angle-Karry:	(248) 835-6934	sakarry@efgroupllc.com
Kevin Cotter:	(716) 857-7631	cotterk@natfuel.com

The results of this Open Season will be posted on Empire's web site www.nationalfuelgas.com/Empire in the Open Seasons Index under Marketing News and Offers.

Contact Our Marketing Department

Return to Open Season Index

BID RESPONSE FORM – REVISED OS006

EMPIRE PIPELINE, INC. – OPEN SEASON REVISED OS006

FIRM LONG-TERM TRANSPORTATION CAPACITY TO CHIPPAWA AND TENNESSEE GAS PIPELINE (ZONE 5) FROM NEW AND EXISTING APPALACHIAN PRODUCING AREAS

Empire is accepting bids for firm transportation service from shippers; subject to the terms and conditions stated in the Notice of Open Season REVISED OS006. This Notice of Open Season appears on Empire's web site at http://www.nationalfuelgas.com/apps/emp_mktg_openseason/OpenSeasonIndex.asp. Please provide the following information:

Name of Shipper ____

Company DUNS # ____

Contact Person ______________________________ Phone ____________________________

Email _______________________________________ Fax______________________________

SHIPPER REQUESTS THE FOLLOWING:

Requested MDQ: ____*Dth/day*

OPTIONAL: Shipper desires the following lower MDQ during first 18 months:
Initial MDQ __________________________ *Dth/day (must be at least 40% of the requested MDQ)*
MDQ at 6 months ___________________ *Dth/day*
MDQ at 12 months __________________ *Dth/day*
*MDQ at 18 months*___________________ *Dth/day (must be equal to the requested MDQ)*

Primary Receipt Point: ____
(if applicable, describe the location of the new producer interconnection)

Primary Delivery Point: ____

Service Start Date: *The later of September 1, 2011 or the date that the required facilities are placed in service.*

Service End Date: ____
(Empire requires a minimum term of 10 years)

Submit Reservation Rate Bids as 100% load factor unit rates. Empire will not accept discounted rate bids that are below $0.2300/Dth (expressed as a 100% load factor unit rate).

Reservation Rate Bid *$*_________________________________ */Dth*

(Please note that service provided pursuant to the proposed rates will be subject to ACA charges, LAUF and compressor fuel as more fully described in Empire's tariff.)

Other Information and/or conditions:

____

____

PLEASE MAIL OR FAX THE COMPLETED BID FORM ALONG WITH A COMPLETED TRANSPORTATION SERVICE REQUEST FORM TO:

Empire Pipeline, Inc. Marketing Department, 6363 Main Street, Williamsville, NY 14221
Phone: (716) 857-7763, Fax: (716) 857-7648

RESPONSES MUST BE RECEIVED BY 12:00 NOON NOVEMBER 25, 2009

UNION GAS LIMITED

Answer to Interrogatory from
Board Staff

Ref: Exhibit A – Customer Need

Union noted that it conducted an open season for the proposed firm Dawn to Dawn-TCPL transportation service.

a) Please confirm that the open season was offered in response to a request from TransCanada.

b) Did any companies, other than TransCanada, make a bid for Dawn to Dawn-TCPL transportation service?

c) If other bids were received, please describe the basis upon which the bids were evaluated.

Response:

a) TransCanada originally approached Union in regard to the market need. Union Gas and TransCanada jointly worked on defining the market need in responding to the changing industry supply and demand dynamics.

b, c) Union received one other bid during the open season, but that bid was withdrawn prior to the end of the open season.

UNION GAS LIMITED

Answer to Interrogatory from
Board Staff

Ref: Exhibit A – Rate Design

Union noted that in order to provide the proposed transportation service, modifications to its existing facilities would be required. The capital costs associated with the station and metering modifications will be approximately $3.3 million.

a) Please provide a detailed breakdown of the capital costs associated with the proposed Dawn to Dawn-TCPL transportation service.

b) Please provide a map highlighting the following related to the Dawn to Dawn-TCPL transportation service:

   i. The receipt point;
   ii. The delivery point;
   iii. The facilities that require upgrades/modifications.

Response:

a)

Total Estimated Station Capital Costs
Dawn to Dawn TCPL Interconnect
($000's)

Prime contractor		1,180
Company materials		
Pipe/valves/fittings	369	
Misc (meters, control valves etc.)	906	
Subtotal Company materials		1,275
Company expenses and labour		97
Outside services		196
Contingency		550
IDC		34
Total project costs		3,332

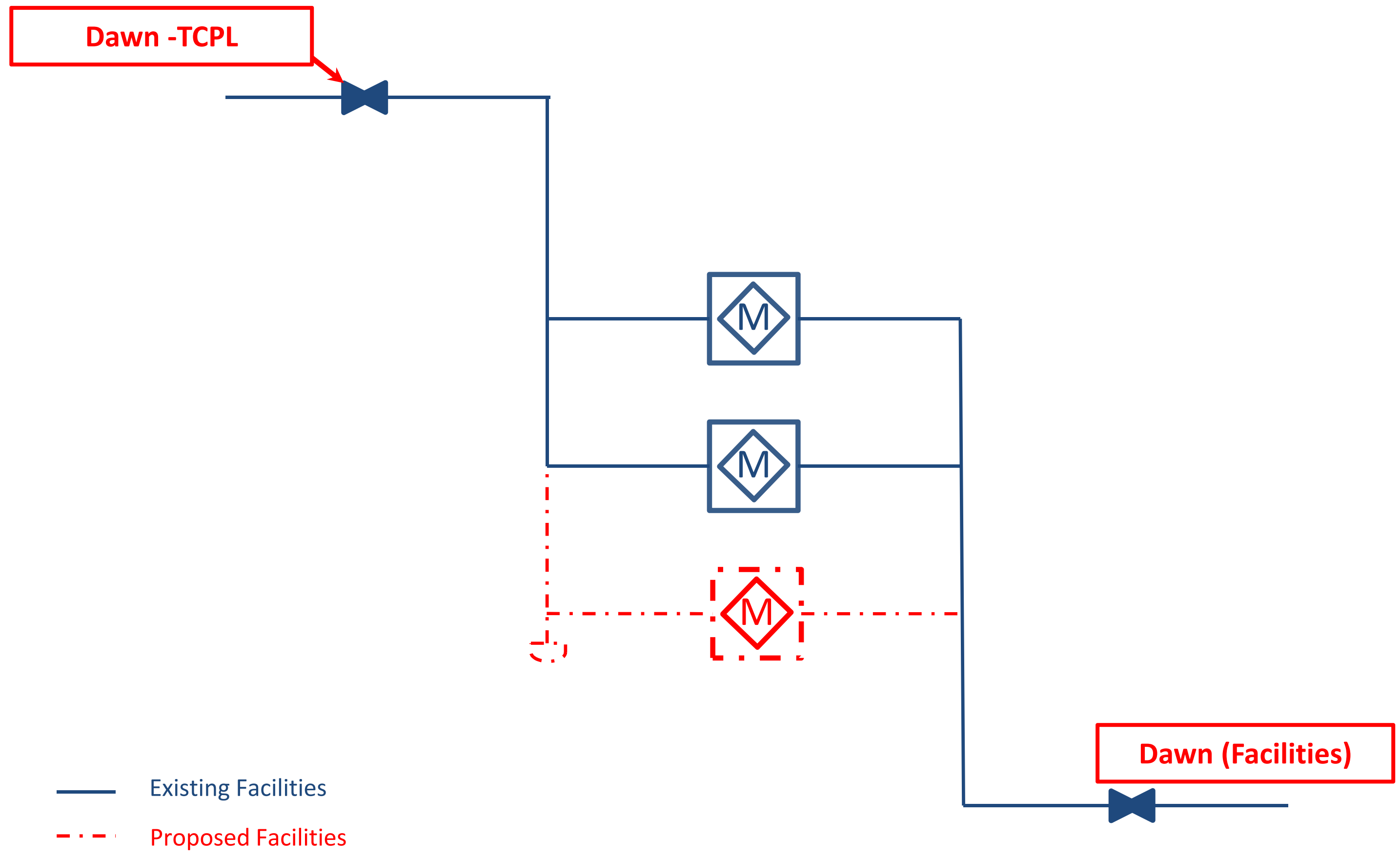
b) Please see the attached schematic highlighting the facilities that require upgrades/modifications (shown in red). Dawn (Facilities) is the receipt point and Dawn (TCPL) is the delivery point for this transportation service. There are two existing meter runs which measure gas that is received by Union from TCPL. An additional meter run and related equipment is being added to allow Union to deliver gas to TCPL at this site.

An overview of the Dawn Hub and various interconnections can be found at Exhibit A, Attachment A.

Filed: 2010-07-15
EB-2010-0207
Exhibit B1.03
Attachment

Dawn to TCPL – Westerly

Bi-Directional Flow



07 July 2010

UNION GAS LIMITED

Answer to Interrogatory from
Board Staff

Ref: Exhibit A, Rate Design

Union noted that the proposed firm monthly demand charge of $0.309/GJ is comprised of two parts.

The first component provides for a reasonable contribution to the recovery of fixed costs associated with the assets used to provide the Dawn to Dawn-TCPL transportation service. This part of the monthly demand charge is calculated using Dawn transmission compression-related costs included in the firm rate for transportation service on the Ojibway / St. Clair transmission system, adjusted for the estimated number of days on which compression is required. Union estimated that there will be approximately 211 days per year (151 days in winter and 60 days in summer) when gas requiring Dawn compression flows through the Dawn-TCPL interconnect.

a) Please describe Union's methodology for estimating the number of days on which compression will be required.

Pursuant to the Addendum (dated July 15, 2010) Union's response to this interrogatory is based on updated information. Specifically, the proposed firm monthly demand charge of $0.309/GJ noted in the preamble has been updated to $0.222/GJ. Further, the estimated number of days on which compression is required has been updated to 90 days per year as opposed to 211 days.

Union is estimating that there will be 90 days of compression in the winter months for Dawn to Dawn (TCPL) compression, which includes each gas day in December, January and February. This estimate was based on Union's expectation of nominations and physical flows and has been updated based on information received from TransCanada. Compression will be required at Dawn (TCPL) to provide this service when the total amount of nominated imports from TCPL at Dawn (TCPL) is less than the total amount of nominated exports at Dawn (TCPL). The total quantity of gas to be compressed could be between 0 and 500,000 GJ/d, and based on information from TransCanada, is expected to occur within the winter months. The service is not expected to be required in the summer months and therefore it has not been included in the forecast. All of the compression requirements, both summer and winter, are dependent upon the quantity of gas delivered to Dawn (TCPL) from TransCanada.

UNION GAS LIMITED

Answer to Interrogatory from
Board Staff

Ref: Exhibit A – Rate Design

The second component of the proposed firm monthly demand charge recovers the costs associated with the capital investment of $3.3 million required to provide the firm transportation service. Union noted that all costs associated with the capital investment will be recovered solely from TransCanada in the proposed firm monthly demand charge over the five-year term of the contract.

a) Was TransCanada informed, prior to the filing of this Application, that all costs associated with the capital investment for the proposed service would be recovered solely from TransCanada over the five-year term of the contract?

b) Will Union hold an open season for the proposed service at the time that TransCanada's contract expires?

c) If there is no interest in the proposed service after TransCanada's contract expires:

    i. What does Union propose to do with the service?

    ii. If Union decides to discontinue the service, will any costs be incurred?

    iii. Do the system upgrades, which are to be implemented to facilitate the proposed service, provide any value to Union if the service is discontinued?

d) How does Union intend to treat cost recovery if there is demand for the proposed service after TransCanada's contract expires?

e) Does Union intend to provide a reduction to TransCanada in rates if the firm transportation contract is renewed or refund a portion of the capital expenditure to TransCanada if new contracts with other shippers are entered into after the 5-year term of TransCanada's contract?

f) Will adjustments be made to this component of the monthly demand charge if the capital investment is higher or lower than the estimated $3.3 million?

Response:

a) Yes. As part of the open season, all participants had 2 term options to choose from - 10 years and 5 years, both with renewal rights, and each with a different rate for service. The 5 year term option was provided at the request of TransCanada. Union calculated the rate for the 10 year term using the traditional 40 year depreciation of costs. This is Union's traditional methodology and is consistent with other rates that require expansion. In calculating a rate for a transportation path with only 1 customer with a 5 year contract term, with no assurances of recontracting beyond the initial 5 year term, Union allocated 100% of the capital costs to the term of the contract.

b) c) d) e) Union does not anticipate a demand for the proposed service after TransCanada's contract expires. After the expiry of TransCanada's contract, Union will evaluate market conditions at that time to determine its most prudent course of action.

f) No. Union bears the risk on capital costs for this project.

UNION GAS LIMITED

Answer to Interrogatory from
Canadian Manufacturers & Exporters ("CME")

Ref: Exhibit A, Page 1, Line 16; Page 2, Lines 3 to 6; Page 5, Lines 1 to 20, and Attachment B

Please provide all emails and other documents in Union's possession pertaining to the responses to the open season described in the evidence, including the various changes that evolved between April 27, 2010 and May 19, 2010.

Response:

Attached are the emails in Union's possession that relate to the responses to the open season described in the evidence.

The emails contain information arising from the TransCanada Tolls Task Force (the "TTF"). Pursuant to the procedures adopted by the members of the TTF, this information is both privileged and confidential and has, therefore, been redacted.

Planting, Patricia

From: Planting, Patricia
Sent: May 16, 2010 10:11 PM
To: Capps, Allen; Isherwood, Mark
Cc: Cameron, Carol
Subject: TTF Update re: UGL's Dawn - Dawn TCPL Open Season

Action Required: Request approval to amend open season to allow 2 contract terms (5 years and 10 years) and extend close of open season to May 27. Both changes will be structured to result in no negative impacts to project or Union Gas.

TTF Update:

From the outset of this issue, TCPL's shippers have raised concerns with the requirement for transportation services from Dawn to Dawn (TCPL) and have struggled to determine the quantity of transportation that they are required/expected to contract for. [redacted]

[redacted]

[redacted]

[redacted]

Impacts to Open Season

There are several benefits to TCPL holding the entirety of this capacity

- No Shippers will have to calculate the quantity of Dawn to Dawn(TCPL) capacity required to ensure that 100% of their deliveries can be delivered to their final TCPL delivery point
- On a daily basis, only TCPL knows the quantity of gas that is required to be delivered to GLGT vs delivered to Union and transported to Parkway

- Based on the above, TCPL will be able to minimize the fuel requirements for this service – a benefit to all shippers

[redacted] TCPL has commented on the following:

1) 10 year term is too long. An option for a 5 year term is under review (using an "Aid to Construct"). This option still requires approvals from Regulatory and Finance and will be structured to result in no negative impacts to Union. A meeting with Regulatory and Finance for 10am Monday.

2) Quantity of fuel requirements for this service. We have explained that the fuel requirements are a function of unaccounted for gas (UFG) and the costs of incremental compression at Dawn. There will be no changes to this requirement.

3) The close date for the open season of May 19th does not permit TCPL to get prior TTF support of their bid. Union can extend the close of the open season to May 27, but maintain the requirement for executed contracts by June 11. This will preserve the timing of the materials order and required construction.

[redacted]

<u>Next Steps</u>

The next steps for Union include the following:

1. Extend term of open season until May 27 – available to all bidders. All bidders will be required to submit binding bids and will be required to execute binding contracts by June 11 – no change from earlier timelines

2. Acquire internal approvals for 5 year contract term – this includes developing an "Aid to Construct" charge for all new facilities ($3.3M). This charge will ensure that 100% of capital costs are recovered over 5 year term and will effectively double the costs to $2M per year. This will be available to all bidders – but only if 100% of capacity will chose shorter term.

3. [redacted]

4. [redacted]

5. [redacted]

A special TTF meeting has been scheduled for Monday May 17th at noon to further discuss Union's Dawn – Dawn TCPL open season. In preparation for this meeting your support of

1) Announcement of a new shorter term and toll for the market to consider. If this is not approved by noon, we will not commit to this option.

2) Extending the close date to May 27 to facilitate final approval and communication of the new terms and market response.

[redacted]

Background: TCPL Mainline has 1.1 Bcf of short haul contracts originating at Dawn. TCPL currently holds 0.6 Bcf of M12 transportation capacity on Union. This leaves a shortfall of 0.5 Bcf that TCPL expects to rely on physical reverse flow from Dawn to GLGT to Emerson and across the Northern Ontario Line to markets east of Parkway. TCPL has a firm contract to facilitate this requirement on GLGT however facilities are needed in the Dawn yard to deliver firm gas supplies from the Dawn Hub to Dawn TCPL . Union's open season to provide 0.5 Bcf is for 10 years is intended to address this market need however it is uncertain as to who should contract for the service. Market clarity is needed to assist eastern LDC shippers who are affected by this shortfall to maintain system reliability for this winter and that no firm customer is shut off.

Patricia Planting
Manager, Upstream Regulation
Tel.: 519-436-4609
Cell: 519-436-1714
Fax: 519-436-4643

Tracking:

Cameron, Carol

From: Planting, Patricia
Sent: May 18, 2010 8:13 AM
To: Cameron, Carol; Capps, Allen; Isherwood, Mark
Cc: Innis, Vanessa
Subject: RE: dawn export update

Thanks Carol. [redacted] Corrections made below to differentiate positions between [redacted]

Also, TCPL will be forwarding a voting package later this week. [redacted].

From: Cameron, Carol
Sent: May 17, 2010 11:31 PM
To: Capps, Allen; Isherwood, Mark; Planting, Patricia
Subject: Fw: dawn export update

From: carol cameron [redacted]
To: Cameron, Carol
Sent: Mon May 17 23:29:48 2010
Subject: dawn export update

Allen - attached is a summary of today's Dawn export activities. I believe that you have a meeting with Mark tomorrow morning. If its agreeable to you, we can take 1/2 hour of this meeting to discuss these issues directly in preparation for your trip to Montreal.
Carol

Today we had another conference call with TCPL and the TTF regarding the Dawn to Dawn (TCPL) open season.
Key issues of the day:
- committed to extend the close of the open season to May 27 (next Thursday). [redacted]
- discussed term of the contract - 5 years vs 10 years. [redacted]

- internally the 5 year "rate" will be calculated as an aid to construct (monthly payments over 5 years). [redacted]

[redacted]

- [redacted]

[redacted]

[redacted]

[redacted]

Next Steps:
- calculate 5 year aid to construct rate, and communicate this option and open season delay to market - ASAP
- [redacted]
- [redacted]
- [redacted]
- [redacted]

- [redacted]

Cameron, Carol

From: Storage.Transportation@uniongas.com
Sent: May 19, 2010 11:44 AM
Subject: Union Gas Extends Closing Date for Dawn to Dawn (TCPL) Transportation Service Open Season

Union Gas extends the closing date for the Firm Dawn to Dawn (TCPL) Transportation Service Open Season to May 27, 2010. At the request of market participants, Union Gas is now offering two term options for this service. A 5-year term offering has been added as a option for Shippers to select. The Demand Charge for this option has been adjusted to reflect the shorter term. All other parameters remain the same.

For more information please visit the open season section of our website or contact your account manager.

Cameron, Carol

From: Cameron, Carol
Sent: May 25, 2010 6:11 PM
To: Tetreault, Greg; Kitchen, Mark; Callingham, Laura; Canniff, Darrin; Hodgson, Tina; O'Hara, Clancy; Hockin, Karen; Arthur, Valerie; Andrews, Wayne; Blanchard, Brad
Cc: Planting, Patricia; Innis, Vanessa; Passmore, Wayne
Subject: Dawn to Dawn (TCPL)

Today, TCPL's shipper group (Tolls Task Force – TTF) voted on whether TCPL should contract directly with Union for the Dawn to Dawn (TCPL) transport capacity. The vote passed [redacted] and TCPL now has endorsement to submit a bid in our open season. This open season closes on Thursday at noon.
While Union had received a bid for a small quantity last week, this bid has been rescinded, thus allowing the open season process to be a little bit cleaner and supporting that TCPL will contract for all of the capacity to serve their customer base.

TCPL is likely to submit 2 conditions in their open season bid

- [redacted]

Next steps:

- Complete calculation of rate – 5 year term with an option for an early termination after 2 or 3 years. We should see draft language on this tomorrow, but we should finish the rate calculation. Greg – can confirm the timelines for completion?
- Complete evidence – I know that the market need is in BD's court. Karen – can you confirm that we are still targeting a filing date for next week?
- Complete interconnect agreement. Work is underway – I'll follow up with Clancy. This needs to be executed prior to awarding capacity.
- Conference call with TCPL to discuss noms and confirmation – likely to be scheduled for tomorrow. More to follow.

Please let me know if you have any questions.
Carol

Carol Cameron
Account Manager, Ex-Franchise Markets
Union Gas Limited
519 436-5258 direct
519 365-5705 mobile
carolat union AOL

Hodgson, Tina

From: [redacted]
Sent: May 10, 2010 3:57 PM
To: Hodgson, Tina
Subject: RE: Please confirm fax received

Thanks

From: Hodgson, Tina [mailto:THodgson@spectraenergy.com]
Sent: May 10, 2010 3:54 PM
To: [redacted]
Subject: RE: Please confirm fax received

[redacted]
I just received your fax.
Thank you
Tina

From: [redacted]
Sent: May 10, 2010 3:51 PM
To: Hodgson, Tina
Subject: Please confirm fax received

Dear Tina,

I just faxed a bid form for the Dawn to Dawn (TCPL) Transportation Service on behalf of [redacted]

Could you please confirm receipt?

Thanks.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

DAWN to DAWN (TCPL) TRANSPORTATION SERVICE BID FORM

If you wish to participate in the Dawn to Dawn (TCPL) Open Season ("Open Season"), please complete and return this Dawn to Dawn (TCPL) Transportation Service Bid Form on or before **12:00 noon Eastern Time on May 19, 2010** via e-mail or fax to:

ATTN: Tina Hodgson **E-mail**: thodgson@uniongas.com **Fax**: (519) 436-4643

This is a binding bid. By signing and returning this Dawn to Dawn (TCPL) Transportation Service Bid Form, subject to Union's acceptance and notification of quantities allocated to Shipper, Shipper hereby irrevocably commits to enter into the Firm Transportation Service Agreement for C1 Transportation Service (found at uniongas.com/openseason) (the "C1 Contract") with Union on the terms outlined below. If this does not occur by June 11, 2010, Union may, in its sole discretion, elect by written notice to Shipper within 10 days thereafter, to either terminate Shipper's participation in this Open Season; or treat Shipper's signature and return of the Dawn to Dawn (TCPL) Transportation Service Bid Form together with the C1 Contract as the legally binding agreement (modified as applicable by Union notification of the quantities allocated to Shipper) between Union and Shipper for the Firm Transportation Service outlined below:

Firm Transportation Service Binding Bid:

Receipt Point	Dawn (Facilities)
Delivery Point	Dawn (TCPL)
Start Date	November 1, 2010
Quantity (GJ/d)	4,700
Term (years)	10 (minimum 10 years)

Dated this 10th day of May 2010.

SHIPPER LEGAL NAME:

[redacted]

By: [redacted]
Signature

[redacted]
Name

[redacted]
Phone

[redacted]

[redacted]

[redacted]

[redacted]

Attention: Ms Tina Hodgson

Fax #: 519-436-4643

Date: May 21, 2010

Pages: 1 of 1

Concerning: Withdraw Dawn to Dawn (TCPL) Bid

Dear Tina:

Given the conversation concerning whether or not TransCanada will bid for the Dawn to Dawn (TCPL) transport on our behalf, [redacted] wishes to withdraw its bid.

Please confirm your acceptance of our withdrawal. You may do so by email if you wish: [redacted]

Thank you for your attention to this matter.

Sincerely,

[redacted]

Hodgson, Tina

From: [redacted]
Sent: May 25, 2010 10:04 AM
To: Hodgson, Tina
Subject: RE: Withdraw Dawn to Dawn(TCPL) bid Confirmation

Thanks Tina.

From: Hodgson, Tina [mailto:THodgson@spectraenergy.com]
Sent: May 25, 2010 9:39 AM
To: [redacted]
Subject: Withdraw Dawn to Dawn(TCPL) bid Confirmation

This e-mail is to confirm that we have received and accepted the withdrawal of your bid submitted on May 5, 2010.
Regards,
Tina Hodgson
519-436-4606

Hodgson, Tina

From: Tim Stringer [tim_stringer@transcanada.com]
Sent: May 27, 2010 11:56 AM
To: Hodgson, Tina
Cc: Cameron, Carol; Don Bell
Subject: Dawn to Dawn TCPL Bid
Attachments: 2010May27_Dawn2DawnTCPL_Bid.pdf

Hi Tina,

Please find attached TransCanada's bid in the Dawn to Dawn TCPL Open Season. Give Don Bell or myself a call if you have any questions.

Thanks,
Tim
416.869.2177

DAWN-to-DAWN (TCPL) TRANSPORTATION SERVICE BID FORM

If you wish to participate in the Dawn-to-Dawn (TCPL) Open Season ("Open Season"), please complete and return this Dawn-to Dawn (TCPL) Transportation Service Bid Form on or before **12:00 noon Eastern Time on May 27, 2010** via e-mail or fax to:

ATTN: Tina Hodgson **E-mail**: thodgson@uniongas.com **Fax**: (519) 436-4643

This is a binding bid. By signing and returning this Dawn-to-Dawn (TCPL) Transportation Service Bid Form, subject to Union's acceptance and notification of quantities allocated to Shipper, Shipper hereby irrevocably commits to enter into the Firm Transportation Service Agreement for C1 Transportation Service (found at uniongas.com/openseason) (the "C1 Contract") with Union on the terms outlined below. If this does not occur by June 11, 2010, Union may, in its sole discretion, elect by written notice to Shipper within 10 days thereafter, to either terminate Shipper's participation in this Open Season; or treat Shipper's signature and return of the Dawn-to-Dawn (TCPL) Transportation Service Bid Form together with the C1 Contract as the legally binding agreement (modified as applicable by Union notification of the quantities allocated to Shipper) between Union and Shipper for the Firm Transportation Service outlined below:

Firm Transportation Service Binding Bid:

Receipt Point	Dawn (Facilities)
Delivery Point	Dawn (TCPL)
Start Date	November 1, 2010
Quantity (GJ/d)	500,000

Select Term option:

☑ **5-year Term Offering**
Term (years) See attached conditions (minimum 5 years)

☐ **10-year Term Offering**
Term (years) ____________ (minimum 10 years)

Dated this 27th day of May 2010.

SHIPPER LEGAL NAME:

TransCanada PipeLines Ltd.

By: [signature]
Signature

Don Bell
Name

(416) 869 2191
Phone

Conditions To TransCanada's May 27th Bid for Union Dawn-to-Dawn (TCPL) Transportation Service

1. Early Termination Of Contract

Prior to the end of the 5 year term TC may determine that the Dawn to Dawn service may no longer be required due to changes in flows or contract levels resulting in an expansion of facilities down stream of Parkway. This bid is therefore conditional on the parties agreeing to terms for early termination of the contract.

2. NEB Approval

The bid is subject to NEB approval of TC contracting for the services on behalf of TC shippers, and receiving approval for full cost recovery of all charges as described in the passed TTF resolution.

In the event that TC does not receive NEB approval as described above TC would reimburse Union for actual facility costs incurred by Union up to the date when TC receives notice that approval was not received as applied for.

3. Nomination Process

The bid is subject to the parties agreeing on an effective nomination/allocation process, where TransCanada and Union would continue to confirm shippers nominations at Union Dawn on TransCanada and Dawn (TCPL) on Union.

UNION GAS LIMITED

Answer to Interrogatory from
Canadian Manufacturers & Exporters ("CME")

Ref: Exhibit A, Page 3, Lines 1 to 4

Please provide an estimate of the increase in Union's utility earnings that the proposed firm Dawn to Dawn-TCPL Transportation Rate will generate.

Response:

In 2011, the first full year of the proposed Dawn to Dawn-TCPL transportation service, the estimated increase in utility earnings is $324,000.

Filed: 2010-07-15
EB-2010-0207
Exhibit B2.03

UNION GAS LIMITED

Answer to Interrogatory from
Canadian Manufacturers & Exporters ("CME")

Ref: Exhibit A, Page 3, Lines 1 to 4

Is the provision of this service likely to have any adverse impacts on any other ratepayers in 2011, 2012 and/or on re-basing in 2013? If so, then please describe these potentially adverse impacts.

Response:

No, Union does not anticipate that the provision of the Dawn to Dawn-TCPL service will have any adverse impacts on other ratepayers.

UNION GAS LIMITED

Answer to Interrogatory from
Canadian Manufacturers & Exporters ("CME")

Ref: Exhibit A, Page 5, Lines 16 to 18

Is there any connection between the 500,000 GJ/day of transportation that forms the subject matter of this Application and the 500,000 GJ/day of transportation that formed the subject matter of the approved sale of the St. Clair line to the Dawn Gateway Limited Partnership ("DGLP"), and the approval granted to DGLP for leave to construct the Dawn Gateway Pipeline? If so, then please describe how the 500,000 GJ/day of volumes that underpinned each of these applications are connected.

Response:

No. These two transportation volumes are unrelated.