

BOARD STAFF INTERROGATORY #1

INTERROGATORY

GAZIFERE PERMANENT EXEMPTION

Ref: Application para. 8

Please provide additional explanation, including the rationale for the “like for like” services exchange between the two utilities (Enbridge and Gazifère) where the evidence states that there is no exchange of funds between the two utilities for the services rendered.

- i) Does this mean that the cost of the services provided would represent a “wash” between the two utilities thereby zeroing out any need to exchange funds?
- ii) If there is no exchange of funds, why does the Intercorporate Services Agreement (ISA) outline in some detail pricing, payment notices and procedures, and rates for the services?
- iii) Please identify the language in the ISA that addresses the “like for like” services feature of the relationship between the two utilities.

RESPONSE

- i) Yes, the ISA schedule, at page 15 of Appendix III of the Application, sets out at the end of section 2.0 that a charge would be issued only if one party were providing substantially more services than the other party.
- ii) This ISA has several schedules for many more services provided by Enbridge to Gazifère, only one of which is relevant to this application and has been filed. The filed schedule for engineering and operations services underpins the services relationship for all of the listed services, that Enbridge provides and Gazifère pays Enbridge for. The only services that Enbridge is not paid for are those emergency on-call services described in the final paragraph at the end of section 2.0 of the schedule.
- iii) The two sections that address the “like for like” services described in the application are the last paragraph at the end of section 2.0 of the schedule, and

the opening phrase of section 6.0 of the schedule (at pp. 15-16 of Appendix III), being "Except for emergency on-call services..." This phrase excepts the emergency on-call services from the pricing conditions of the agreement and schedule.

## BOARD STAFF INTERROGATORY #2

### INTERROGATORY

#### GAZIFERE PERMANENT EXEMPTION

Ref: Application, Appendix III

- i) The ISA governing the subject relationship between Enbridge and Gazifère is presented in draft (i.e., unsigned) form at Appendix III. Is it Enbridge's intention to file an executed (i.e., signed) form of the ISA after the Board's approval of the exemption?
- ii) Is Enbridge requesting specific Board approval of the ISA attached in draft form at Appendix III at this time?

### RESPONSE

i and ii) Enbridge has filed the ISA in draft form because in the Board's decision on the prior related exemption request in EB-2008-0275, the Board stated on page 5,

The Board also confirms that an inter-corporate services agreement is to be provided in evidence when filing for future exemptions. The Board's rules specifically require this agreement when considering requests for exemptions.

Although Enbridge is not aware of any express statement in a Board rule requiring the filing of an ISA with an exemption request, Enbridge accepts this Board statement as setting that requirement.

Enbridge has chosen not to finalize the ISA until after the Board approves those provisions of the ISA that are relevant to this application. Enbridge has no objection to filing an executed copy of the ISA once Board approval is received.

BOARD STAFF INTERROGATORY #3

INTERROGATORY

WIND FARM PERMANENT EXEMPTION

Ref: Application para. 11

Please provide confirmation that the subject wind farm facilities do not qualify as a “qualifying facility” pursuant to the September 8, 2009 Order in Council No. 1540/2009 (Minister’s Directive) and in respect of the amendments to the Affiliate Relationships Code as outlined in the Board’s “Notice of Amendments to a Rule” dated November 26, 2010.

RESPONSE

Confirmed. The capacity of the subject wind farm facilities exceeds 10 MW.

BOARD STAFF INTERROGATORY #4

INTERROGATORY

WIND FARM PERMANENT EXEMPTION

Ref: Application para. 11

Please provide Enbridge's current expectation of the commissioning dates for the windfarms identified as Talbot and Greenwich.

RESPONSE

Enbridge commenced providing Control Services for the commissioning of the Talbot wind farm on December 22, 2010. The targeted commissioning date for the Greenwich wind farm is October 31, 2011.

BOARD STAFF INTERROGATORY #5

INTERROGATORY

WIND FARM PERMANENT EXEMPTION

Ref: Application para. 14

Please provide an estimate (or a range of estimates if appropriate) of the total annual fees payable to Enbridge Gas Distribution Inc. by the three (3) wind farms mentioned in the Application.

RESPONSE

Enbridge estimates total annual revenues from the three wind farms to be approximately \$290,000.

BOARD STAFF INTERROGATORY #6

INTERROGATORY

WIND FARM PERMANENT EXEMPTION

Ref: Application Appendix IV

- i) The Intercompany Services Agreement (ISA) governing the relationship between Enbridge and Greenwich Windfarm LP is presented in draft form (i.e., unsigned) at Appendix IV. Is it Enbridge's intention to file an executed (i.e., signed) form of this ISA, and the ISA governing the Talbot Windfarm, after the Board's approval of the section 2.2.4 exemption?
- ii) Is Enbridge requesting specific Board approval at this time of the terms contained in the ISA attached in draft form at Appendix IV?

RESPONSE

i and ii) Enbridge has filed the ISA in draft form because in the Board's decision on the prior related exemption request in EB-2008-0275, the Board stated on page 5,

The Board also confirms that an inter-company services agreement is to be provided in evidence when filing for future exemptions. The Board's rules specifically require this agreement when considering requests for exemptions.

Although Enbridge is not aware of any express statement in a Board rule requiring the filing of an ISA with an exemption request, Enbridge accepts this Board statement as setting that requirement.

Enbridge has chosen not to finalize the ISA until after the Board approves those provisions of the ISA that are relevant to this application. Enbridge has no objection to filing an executed copy of the ISA once Board approval is received.