

July 13, 2012

Gordon Cameron
Blake, Cassels & Graydon
45 O'Connor Street
Suite 2000, World Exchange Plaza
Ottawa, ON K1P 1A4

Dear Ms. Cameron:

**Re: EB-2011-0210
Union Gas Limited – TCPL Answers to Interrogatories**

We are counsel to Union Gas Limited in the above-noted matter. We are writing in respect of your client, TCPL's, interrogatories. As a result of discussions between our respective clients, we understand that TCPL has agreed to provide more information where possible to TCPL 5 (c) (i) (ii) and TCPL 11(i) with a view to avoiding the necessity of a motion by Union. Those interrogatories and Union's requests are set out below.

Union-TCPL 5 (c) (i) and (ii)

- Reference: TransCanada Written Evidence, Section 3.1, page 5, lines 11-13
- Preamble: TransCanada states its IT service is essentially firm due to under-contracting on the system.
- Question (c): For each day during the period November 1 to March 31 in each of the years 2000-01, 2001-02, 2002-03, 2003,-04, 2004-05, 2005-06, 2006-07, 2007-08, 2008-09, 2009-10, 2010-11 and 2011-12, please provide for Empress to CDA and Empress to EDA the maximum amount of IT on each day that was i) available, ii) nominated and iii) flowed, based on each of the four NAESB nomination windows.
- Response (c) (i): Data is not available to determine how much IT was available per day on all NAESB nomination windows.
- Request:** If data is not available at all NAESB nomination windows, provide the data that is available.
- Response (c) (ii): Nomination records are available in end of day scheduled quantities not as nominated for all NAESB nomination windows.
- Request:** If data is not available for all NAESB nomination windows, could TCPL provide the data that is available.

Union-TCPL 11(i)

Reference: TransCanada Written Evidence, Section 3.2, page 8, lines 14-20

Preamble: TransCanada states that it can transfer existing equipment from another location to Parkway, thus using existing infrastructure. TransCanada states that could install the compressor adjacent to the existing TransCanada lines.

Question (i): How are the costs for spare compressors on the Mainline system allocated? Are Ontario consumers the only consumers to pay for spare compressors on the Mainline system?

Response: There are no “spare compressors on the Mainline system”.

Request: In the response to Union-TCPL 11(g), TCPL indicates that approval has been received to deactivate four units on the Canadian Mainline. Union Gas requests that TransCanada provide how the costs for these deactivated assets are allocated on the Mainline system and indicate whether Ontario consumers are the only consumers to pay for deactivated compressors on the Mainline system.

Should you have any questions or concerns, please do not hesitate to contact me.

Yours truly,

[original signed by]

Crawford Smith

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CS/tm

cc: All EB-2011-0120 Intervenors
Kirsten Walli, Board Secretary