UNDERTAKING JT2.1

UNDERTAKING

TR 2, page 38

To provider an explanation of how non-utility storage is paying for LUF, and an explanation of how Enbridge utility is paying for LUF.

RESPONSE

The last engineering study conducted for determining the level of Lost and Unaccounted for Gas ("LUF") was done prior to the 2007 fiscal year. Based upon that study a provision for 23,763.5 10^3m^3 for LUF has been included in the derivation of the Company gas costs forecast. The value or cost of that provision is based upon the current QRAM Reference Price. Please see EB-2012-0238, Exhibit Q3-3, Tab 2, Schedule 1, Line #4 as an example how the revenue requirement is impacted by the QRAM process. The QRAM process brings the cost of the LUF provision up to the current QRAM Reference price. The associated cost of the provision is then collected from all of EGD's customers as part of rates.

Because the provision of 23,763.5 10^3m^3 was based upon the Utility storage capacity prior to the implementation of the unregulated storage business there is no additional cost being incurred by the Utility customers because of the unregulated storage business. Therefore, there is no need to allocate any of these costs to the unregulated storage business.

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

UNDERTAKING JT2.2

UNDERTAKING

TR 2, page 42

To provide the volumes of peaking supply that were contracted in 2011 and 2012.

RESPONSE

For the 2011/2012 winter EGD entered into a total of 9 contracts that would provide a total of 158,260 Gj's/day of peaking service if all contracts were called upon at the same time.

The RFP that was sent out to prospective parties did specify that the Company was requesting bids for firm (emphasis added) natural gas peaking supply to the delivery area. The RFP did not ask providers to demonstrate that their supply was underpinned by firm transport.

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

UNDERTAKING JT2.3

UNDERTAKING

TR 2, page 49

To provide monthly amounts for the past 18 months, what amount of firm transport was available to CDA and EDA using either TCPL's index of customers or the open seasons that TCPL released earlier this summer.

RESPONSE

The table below shows the amount, in GJ/d, of long haul and short haul (including STS) FT contracts held to the Enbridge CDA and Enbridge EDA. Data are taken from the monthly CDE reports available on the TransCanada website. FT-SN and STFT contracts are not included in the table. TransCanada does not publicly post STFT capacity held by shippers on its system. While TransCanada does provide FT-SN capacity to its delivery areas in the CDE reports, capacity held under these contracts was not included in the table below as FT-SN is a point to point service. Furthermore, all FT-SN contracts are held by Enbridge Gas Distribution and electricity generators. Data in the table are before assignments.

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

	Enbridge CDA	Enbridge EDA
Apr-11	531,230	392,032
May-11	531,230	392,032
Jun-11	531,230	392,032
Jul-11	531,230	392,032
Aug-11	531,230	392,032
Sep-11	531,230	392,032
Oct-11	531,230	392,032
Nov-11	531,230	392,032
Dec-11	531,230	392,032
Jan-12	519,848	392,032
Feb-12	519,848	392,032
Mar-12	519,848	392,032
Apr-12	519,848	392,032
May-12	519,848	392,032
Jun-12	519,848	392,032
Jul-12	519,848	392,032
Aug-12	519,848	392,032
Sep-12	519,848	392,032

As of September 4, 2012 and before assignments Enbridge Gas Distribution held 497,750 GJ/d of contracted capacity to the Enbridge CDA and all of the contracted capacity to the Enbridge EDA. Total capacity to the Enbridge CDA and Enbridge EDA held by shippers other than Enbridge Gas Distribution, as of September 4, 2012 is equal to 22,098 GJ/d.

In terms of delivered supplies to the CDA or EDA there is no guarantee that a marketer holding a firm transportation contract would utilize that contract to deliver peaking supplies even if that marketer is listed as holding a firm transportation contract on the TransCanada system. Even if a marketer were to hold a firm transportation contract with TransCanada and were to guarantee to Enbridge that it would utilize this contract to meet peaking requirements for the Company, the marketer would have to reserve this capacity for a majority of the winter season as peaking supplies can be called at any time during this period. This reservation of capacity would entail a premium if offered and would not be cost effective against the alternative of Enbridge holding the capacity itself.

Attachment 1 contains the September 2012 TransCanada CDE report.

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

CONTRACT DEMAND ENERGY (CDE) REPORT - Mainline

As Of Date: 2012-Sep-04

Service Type: FST, FT, FT-NR, FT-SN, LTWFS, STS

Contract Number	Service Requester	Contract Start Date	Contract End Date	Service Type	Primary Receipt	Primary Delivery	Contract Demand (GJ/d)	Operational Demand (GJ/d)	Shifted Qty (GJ/d)	Temp Assigned Qty (GJ/d)
5107	Bunge Canada	1994-Nov-01	2013-Oct-31	FT	Welwyn	Centram MDA	1,332	1,332	0	0
37575	Centra Gas Manitoba Inc.	2009-Nov-01	2013-Oct-31	FT	Empress	Centram MDA	110,000	110,000	0	0
29802	Diageo Canada Inc.	2006-May-15	2013-Oct-31	FT	Empress	Centram MDA	400	0	0	400
29803	Diageo Canada Inc.	2006-May-15	2013-Oct-31	FT	Empress	Centram MDA	2,400	0	0	2,400
41189	Gerdau Ameristeel Corporation	2011-Jan-01	2013-Mar-31	FT	Empress	Centram MDA	1,000	1,000	0	0
43036	Husky Energy Marketing Inc.	2011-Nov-01	2012-Oct-31	FT	Empress	Centram MDA	5,000	5,000	0	0
43223	Koch Canada Energy Services, LP	2011-Nov-01	2012-Oct-31	FT	Welwyn	Centram MDA	3,750	3,750	0	0
43227	Koch Canada Energy Services, LP	2011-Nov-01	2012-Oct-31	FT	Empress	Centram MDA	44,000	44,000	0	0
5665	Maple Leaf Foods Inc.	1995-Nov-01	2013-Oct-31	FT	Empress	Centram MDA	706	0	0	706
26474	McCain Foods Limited	2005-Mar-01	2013-Oct-31	FT	Empress	Centram MDA	1,200	0	0	1,200
35633	McCain Foods Limited	2008-Nov-01	2013-Oct-31	FT	Empress	Centram MDA	1,700	1,700	0	0
						Centram MDA Total	**171,488**	**166,782**	**0**	**4,706**
3036	Centra Gas Manitoba Inc.	1993-Dec-01	2013-Oct-31	FT	Empress	Centram SSDA	1,200	1,200	0	0
42927	TransGas Limited	2011-Nov-01	2012-Oct-31	FT	Empress	Centram SSDA	1,507	1,507	0	0
						Centram SSDA Total	**2,707**	**2,707**	**0**	**0**
41825	Resolute FP Canada Inc.	2011-Feb-01	2013-Oct-31	FT	Empress	Centrat MDA	2,500	2,500	0	0
6309	Union Gas Limited	1996-Jul-01	2013-Dec-31	FT	Empress	Centrat MDA	4,522	0	0	4,522
						Centrat MDA Total	**7,022**	**2,500**	**0**	**4,522**
36758	Dynegy Gas Imports, LLC	2008-Dec-01	2015-Oct-31	FT	Kirkwall	Chippawa	41,491	41,491	0	0
36759	Dynegy Gas Imports, LLC	2008-Dec-01	2015-Oct-31	FT	St. Clair	Chippawa	124,142	124,142	0	0
35799	KeySpan Gas East Corporation	2008-Nov-01	2018-Oct-31	FT	Kirkwall	Chippawa	137,157	0	0	137,157
41226	National Fuel Gas Distribution Corporation	2006-Nov-01	2017-Oct-31	FT	Kirkwall	Chippawa	10,699	0	0	10,699
41227	National Fuel Gas Distribution Corporation	2007-Nov-01	2020-Oct-31	FT	Kirkwall	Chippawa	15,794	0	0	15,794
5020	New York State Electric & Gas Corporation	1994-Nov-01	2012-Oct-31	FT	Empress	Chippawa	10,593	0	0	10,593
2937	Rochester Gas and Electric Corporation	1993-Nov-01	2012-Oct-31	FT	St. Clair	Chippawa	37,262	0	0	37,262
2939	Rochester Gas and Electric Corporation	1993-Nov-01	2013-Oct-31	FT	St. Clair	Chippawa	107,541	0	0	107,541
33199	Shell Energy North America (Canada) Inc.	2007-Nov-01	2012-Oct-31	FT	Kirkwall	Chippawa	8,706	8,706	0	0
						Chippawa Total	**493,385**	**174,339**	**0**	**319,046**
13611	Alcoa Inc.	1999-Dec-01	2012-Oct-31	FT	Empress	Cornwall	1,294	0	0	1,294
32436	Alcoa Inc.	2007-Nov-01	2013-Jun-30	FT	Empress	Cornwall	6,000	0	0	6,000
18342	Canton Central School District	2002-Nov-01	2013-Oct-31	FT	Empress	Cornwall	63	0	0	63
27539	Canton Central School District	2005-Nov-01	2013-Oct-31	FT	Empress	Cornwall	3	0	0	3
13292	City of Ogdensburg	1999-Nov-01	2013-Oct-31	FT	Empress	Cornwall	19	0	0	19
18321	Clarkson University	2002-Nov-01	2013-Oct-31	FT	Empress	Cornwall	525	0	0	525
18320	Heuvelton Central School District	2002-Nov-01	2013-Oct-31	FT	Empress	Cornwall	34	0	0	34
18349	Hoosier Magnetics, Inc.	2002-Nov-01	2013-Oct-31	FT	Empress	Cornwall	330	0	0	330
18338	Lisbon Central School District	2002-Nov-01	2013-Oct-31	FT	Empress	Cornwall	19	0	0	19
27537	Lisbon Central School District	2005-Nov-01	2013-Oct-31	FT	Empress	Cornwall	2	0	0	2
18328	Madrid-Waddington Central School District	2002-Nov-01	2013-Oct-31	FT	Empress	Cornwall	26	0	0	26
18318	Massena Central School District	2002-Nov-01	2013-Oct-31	FT	Empress	Cornwall	135	0	0	135
27538	Massena Central School District	2005-Nov-01	2013-Oct-31	FT	Empress	Cornwall	4	0	0	4
18341	Norwood-Norfolk Central School District	2002-Nov-01	2013-Oct-31	FT	Empress	Cornwall	49	0	0	49
31593	Ogdensburg City School District	2006-Nov-01	2013-Oct-31	FT	Empress	Cornwall	19	0	0	19
31594	Ogdensburg City School District	2006-Nov-01	2013-Oct-31	FT	Empress	Cornwall	75	0	0	75
18340	Potsdam Central School District	2002-Nov-01	2013-Oct-31	FT	Empress	Cornwall	83	0	0	83
19233	St. Lawrence Gas Company, Inc.	2002-Nov-01	2013-Oct-31	STS	Union Parkway Belt	Cornwall	10,300	10,300	0	0
19331	St. Lawrence Gas Company, Inc.	2003-Nov-01	2013-Oct-31	FT	Empress	Cornwall	7,100	7,100	0	0
21988	St. Lawrence Gas Company, Inc.	2003-Nov-01	2013-Oct-31	FT	Empress	Cornwall	3,200	3,200	0	0
13375	St. Lawrence University	1999-Nov-01	2013-Oct-31	FT	Empress	Cornwall	362	0	0	362
33328	St. Lawrence University	2007-Nov-01	2013-Oct-31	FT	Empress	Cornwall	54	0	0	54
43348	St. Lawrence-Lewis BOCES	2011-Nov-01	2013-Oct-31	FT	Empress	Cornwall	25	0	0	25
18317	St. Regis Nursing Home and Health Related Facility, Inc.	2002-Nov-01	2013-Oct-31	FT	Empress	Cornwall	29	0	0	29
						Cornwall Total	**29,750**	**20,600**	**0**	**9,150**
33321	Bay State Gas Company	2007-Nov-01	2018-Mar-31	FT	Union Dawn	East Hereford	16,881	0	0	16,881
33322	Northern Utilities, Inc.	2007-Nov-01	2018-Mar-31	FT	Union Dawn	East Hereford	35,872	0	0	35,872
						East Hereford Total	**52,753**	**0**	**0**	**52,753**

CONTRACT DEMAND ENERGY (CDE) REPORT - Mainline

As Of Date: 2012-Sep-04

Service Type: FST, FT, FT-NR, FT-SN, LTWFS, STS

Contract Number	Service Requester	Contract Start Date	Contract End Date	Service Type	Primary Receipt	Primary Delivery	Contract Demand (GJ/d)	Operational Demand (GJ/d)	Shifted Qty (GJ/d)	Temp Assigned Qty (GJ/d)
2771	Centra Gas Manitoba Inc.	1993-Apr-01	2013-Mar-31	STS	Centram MDA	Emerson 2	54,000	54,000	0	0
12359	City of Duluth	1999-Nov-01	2014-Oct-31	FT	Empress	Emerson 2	6,532	0	0	6,532
10587	United States Gypsum Company	1997-Nov-01	2012-Oct-31	FT	Empress	Emerson 2	14,550	0	0	14,550
						Emerson 2 Total	**75,082**	**54,000**	**0**	**21,082**
20394	Ag Energy Co-operative Ltd.	2003-Nov-01	2013-Oct-31	FT	Union Dawn	Enbridge CDA	4,700	4,700	0	0
20395	Canada Starch Operating Company Inc.	2003-Nov-01	2013-Dec-31	FT	Union Dawn	Enbridge CDA	4,398	4,398	0	0
1349	Enbridge Gas Distribution Inc.	1989-Nov-01	2013-Oct-31	FT	Empress	Enbridge CDA	40,093	33,174	0	6,919
2623	Enbridge Gas Distribution Inc.	1992-Nov-01	2013-Oct-31	STS	Union Parkway Belt	Enbridge CDA	153,700	153,700	0	0
15957	Enbridge Gas Distribution Inc.	2001-Nov-01	2013-Oct-31	STS	Union Parkway Belt	Enbridge CDA	92,822	92,822	0	0
18786	Enbridge Gas Distribution Inc.	2002-Nov-01	2013-Oct-31	STS	Union Parkway Belt	Enbridge CDA	37,370	37,370	0	0
20260	Enbridge Gas Distribution Inc.	2003-Nov-01	2013-Oct-31	FT	Union Dawn	Enbridge CDA	4,818	4,818	0	0
20266	Enbridge Gas Distribution Inc.	2003-Nov-01	2013-Oct-31	FT	Union Dawn	Enbridge CDA	145,000	100,467	0	44,533
29244	Enbridge Gas Distribution Inc.	2006-Apr-01	2013-Oct-31	FT	Empress	Enbridge CDA	15,000	15,000	0	0
35516	Enbridge Gas Distribution Inc.	2008-Nov-01	2013-Oct-31	FT	Union Parkway Belt	Enbridge CDA	572	572	0	0
38826	Enbridge Gas Distribution Inc.	2009-Nov-01	2013-Oct-31	FT	Empress	Enbridge CDA	8,375	8,375	0	0
20383	Greater Toronto Airports Authority	2003-Nov-01	2013-Oct-31	FT	Union Dawn	Enbridge CDA	1,100	0	0	1,100
28756	Greater Toronto Airports Authority	2006-Apr-01	2018-Oct-31	FT	Union Parkway Belt	Enbridge CDA	7,500	127	0	7,373
20224	Oxy Vinyls Canada Co.	2003-Apr-01	2013-Oct-31	FT	Union Dawn	Enbridge CDA	1,800	1,800	0	0
38224	Shell Energy North America (Canada) Inc.	2009-Oct-01	2013-Oct-31	FT	Union Dawn	Enbridge CDA	2,600	2,600	0	0
						Enbridge CDA Total	**519,848**	**459,923**	**0**	**59,925**
1140	Enbridge Gas Distribution Inc.	1989-Aug-08	2013-Oct-31	STS	Union Parkway Belt	Enbridge EDA	35,089	35,089	0	0
1338	Enbridge Gas Distribution Inc.	1989-Nov-01	2013-Oct-31	FT	Empress	Enbridge EDA	32,357	7,259	0	25,098
2172	Enbridge Gas Distribution Inc.	1991-Nov-01	2013-Oct-31	FT	Empress	Enbridge EDA	21,584	17,590	0	3,994
5019	Enbridge Gas Distribution Inc.	1994-Nov-01	2013-Oct-31	FT	Empress	Enbridge EDA	7,613	7,613	0	0
5445	Enbridge Gas Distribution Inc.	1995-Nov-01	2013-Oct-31	FT	Empress	Enbridge EDA	19,692	19,692	0	0
5834	Enbridge Gas Distribution Inc.	1995-Nov-01	2013-Oct-31	FT	Empress	Enbridge EDA	10,773	10,773	0	0
6646	Enbridge Gas Distribution Inc.	1996-Nov-01	2013-Oct-31	FT	Empress	Enbridge EDA	10,773	10,773	0	0
10862	Enbridge Gas Distribution Inc.	1997-Nov-01	2013-Oct-31	FT	Empress	Enbridge EDA	26,952	26,952	0	0
13307	Enbridge Gas Distribution Inc.	1999-Nov-01	2013-Oct-31	STS	Union Parkway Belt	Enbridge EDA	35,806	35,806	0	0
21854	Enbridge Gas Distribution Inc.	2003-Nov-01	2013-Oct-31	STS	Union Parkway Belt	Enbridge EDA	9,716	9,716	0	0
21987	Enbridge Gas Distribution Inc.	2003-Nov-01	2013-Oct-31	FT	Union Dawn	Enbridge EDA	114,000	101,800	0	12,200
34937	Enbridge Gas Distribution Inc.	2008-Nov-01	2013-Oct-31	FT	Empress	Enbridge EDA	25,000	0	0	25,000
36057	Enbridge Gas Distribution Inc.	2009-Nov-01	2013-Oct-31	FT	Empress	Enbridge EDA	42,226	0	0	42,226
43857	Enbridge Gas Distribution Inc.	2012-Feb-01	2013-Oct-31	FT	Empress	Enbridge EDA	451	451	0	0
						Enbridge EDA Total	**392,032**	**283,514**	**0**	**108,518**
44175	BP Canada Energy Group ULC	2012-Apr-01	2013-Oct-31	FT	Iroquois	GMIT EDA	8,267	8,267	0	0
44176	BP Canada Energy Group ULC	2012-Apr-01	2013-Oct-31	FT	Iroquois	GMIT EDA	18,685	18,685	0	0
39571	Direct Energy Marketing Limited	2010-Nov-01	2012-Oct-31	FT	Iroquois	GMIT EDA	25,000	25,000	0	0
20562	Domtar Inc.	2003-May-01	2013-Oct-31	FT	Empress	GMIT EDA	2,500	2,500	0	0
1141	Gaz Metro Limited Partnership	1985-Nov-01	2013-Apr-15	STS	Union Parkway Belt	GMIT EDA	25,629	25,629	0	0
1741	Gaz Metro Limited Partnership	1990-Oct-01	2013-Oct-31	FT	Empress	GMIT EDA	216,274	180,274	0	36,000
6245	Gaz Metro Limited Partnership	1996-Apr-16	2013-Apr-15	STS	Union Parkway Belt	GMIT EDA	125,545	125,545	0	0
16106	Gaz Metro Limited Partnership	2001-Nov-01	2013-Oct-31	STS	Union Parkway Belt	GMIT EDA	45,000	45,000	0	0
20268	Gaz Metro Limited Partnership	2003-Nov-01	2013-Oct-31	FT	Union Dawn	GMIT EDA	50,000	15,000	0	35,000
21989	Gaz Metro Limited Partnership	2005-Nov-01	2015-Oct-31	FT	Union Dawn	GMIT EDA	40,000	0	0	40,000
22306	Gaz Metro Limited Partnership	2005-Nov-01	2015-Oct-31	STS	Union Parkway Belt	GMIT EDA	20,000	20,000	0	0
22521	Gaz Metro Limited Partnership	2003-Nov-01	2013-Oct-31	FT	Union Dawn	GMIT EDA	20,000	0	0	20,000
33680	Gaz Metro Limited Partnership	2007-Nov-01	2017-Oct-31	FT	Union Parkway Belt	GMIT EDA	65,000	15,000	0	50,000
37573	J.P. Morgan Commodities Canada Corporation	2009-Nov-01	2013-Oct-31	FT	Iroquois	GMIT EDA	10,000	10,000	0	0
39572	J.P. Morgan Commodities Canada Corporation	2010-Nov-01	2013-Oct-31	FT	Iroquois	GMIT EDA	3,048	3,048	0	0
35449	Kruger Inc.	2008-Jul-01	2012-Oct-31	FT	Empress	GMIT EDA	771	0	0	771
29557	TransCanada Energy Ltd.	2006-Dec-02	2018-Dec-31	FT	Union Dawn	GMIT EDA	100,000	9,449	0	90,551
						GMIT EDA Total	**775,719**	**503,397**	**0**	**272,322**
1085	Gaz Metro Limited Partnership	1988-Nov-01	2013-Oct-31	FT	Empress	GMIT NDA	12,397	12,397	0	0
21659	Gaz Metro Limited Partnership	2003-Nov-01	2013-Oct-31	FT	Empress	GMIT NDA	2,930	2,930	0	0
						GMIT NDA Total	**15,327**	**15,327**	**0**	**0**

CONTRACT DEMAND ENERGY (CDE) REPORT - Mainline

As Of Date: 2012-Sep-04

Service Type: FST, FT, FT-NR, FT-SN, LTWFS, STS

Contract Number	Service Requester	Contract Start Date	Contract End Date	Service Type	Primary Receipt	Primary Delivery	Contract Demand (GJ/d)	Operational Demand (GJ/d)	Shifted Qty (GJ/d)	Temp Assigned Qty (GJ/d)
36992	Goreway Station Partnership	2009-Jan-01	2028-Oct-31	FT-SN	Union Parkway Belt	Goreway CDA	20,000	20,000	0	0
36993	Goreway Station Partnership	2009-Jan-01	2013-Oct-31	FT-SN	Union Parkway Belt	Goreway CDA	120,000	120,000	0	0
						Goreway CDA Total	**140,000**	**140,000**	**0**	**0**
41234	Bay State Gas Company	2006-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Iroquois	27,498	0	0	27,498
41218	Boston Gas Company	2006-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Iroquois	2,134	0	0	2,134
41229	Boston Gas Company	2006-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Iroquois	9,180	0	0	9,180
5507	Brooklyn Navy Yard Cogeneration Partners, L.P.	1996-Oct-01	2016-Oct-31	FT	Empress	Iroquois	26,956	0	0	26,956
41233	Central Hudson Gas & Electric Corporation	2006-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Iroquois	10,674	10,674	0	0
42389	Central Hudson Gas & Electric Corporation	2011-Nov-01	2016-Oct-31	FT	Union Parkway Belt	Iroquois	5,399	5,399	0	0
41219	Colonial Gas Company	2006-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Iroquois	6,404	0	0	6,404
41224	Connecticut Natural Gas Corporation	2007-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Iroquois	264	264	0	0
41225	Connecticut Natural Gas Corporation	2008-Nov-01	2019-Oct-31	FT	Union Parkway Belt	Iroquois	6,436	6,436	0	0
41238	Connecticut Natural Gas Corporation	2006-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Iroquois	17,879	7,328	0	10,551
41239	Connecticut Natural Gas Corporation	2007-Nov-01	2018-Oct-31	FT	Union Parkway Belt	Iroquois	8,807	8,807	0	0
42382	Connecticut Natural Gas Corporation	2011-Nov-01	2016-Oct-31	FT	Union Parkway Belt	Iroquois	6,330	6,330	0	0
42379	Consolidated Edison Company of New York, Inc.	2011-Nov-01	2016-Oct-31	FT	Union Parkway Belt	Iroquois	11,859	0	0	11,859
42380	Consolidated Edison Company of New York, Inc.	2011-Nov-01	2016-Oct-31	FT	Union Parkway Belt	Iroquois	9,695	0	0	9,695
40085	Enbridge Gas Distribution Inc.	2010-Sep-01	2013-Mar-31	FT	Union Dawn	Iroquois	40,000	40,000	0	0
41232	EnergyNorth Natural Gas, Inc.	2007-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Iroquois	4,270	0	0	4,270
21962	Husky Energy Marketing Inc.	2003-Oct-01	2013-Mar-31	FT	Empress	Iroquois	13,557	13,557	0	0
42820	J. Aron & Company	2011-Nov-01	2012-Oct-31	FT	Empress	Iroquois	6,406	6,406	0	0
27212	J.P. Morgan Commodities Canada Corporation	2005-Jul-21	2013-Oct-31	FT	Empress	Iroquois	15,103	15,103	0	0
41220	KeySpan Gas East Corporation	2007-Nov-01	2018-Oct-31	FT	Union Parkway Belt	Iroquois	22,522	0	0	22,522
41228	KeySpan Gas East Corporation	2006-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Iroquois	16,972	0	0	16,972
42383	KeySpan Gas East Corporation	2011-Nov-01	2016-Oct-31	FT	Union Parkway Belt	Iroquois	7,599	0	0	7,599
42388	KeySpan Gas East Corporation	2011-Nov-01	2016-Oct-31	FT	Union Parkway Belt	Iroquois	35,694	0	0	35,694
34834	New York State Electric & Gas Corporation	2008-Feb-01	2012-Oct-31	FT	Empress	Iroquois	7,205	0	0	7,205
42809	New York State Electric & Gas Corporation	2011-Nov-01	2012-Oct-31	FT	Empress	Iroquois	10,941	0	0	10,941
42385	Niagara Mohawk Power Corporation	2011-Nov-01	2016-Oct-31	FT	Union Parkway Belt	Iroquois	54,437	0	0	54,437
41235	Northern Utilities, Inc.	2006-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Iroquois	6,264	0	0	6,264
14109	Paramount Resources Ltd.	2000-May-01	2014-Oct-31	FT	Empress	Iroquois	811	0	0	811
5048	Selkirk Cogen Partners, L.P.	1994-Nov-01	2014-Oct-31	FT	Empress	Iroquois	58,485	58,485	0	0
27213	Shell Energy North America (Canada) Inc.	2005-Nov-01	2012-Oct-31	FT	Empress	Iroquois	5,293	5,293	0	0
41215	The Brooklyn Union Gas Company	2006-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Iroquois	12,810	0	0	12,810
41217	The Brooklyn Union Gas Company	2007-Nov-01	2018-Oct-31	FT	Union Parkway Belt	Iroquois	29,886	0	0	29,886
42384	The Brooklyn Union Gas Company	2011-Nov-01	2016-Oct-31	FT	Union Parkway Belt	Iroquois	7,778	0	0	7,778
42387	The Brooklyn Union Gas Company	2011-Nov-01	2016-Oct-31	FT	Union Parkway Belt	Iroquois	35,694	0	0	35,694
42386	The Narragansett Electric Company	2011-Nov-01	2016-Oct-31	FT	Union Parkway Belt	Iroquois	1,068	0	0	1,068
41221	The Southern Connecticut Gas Company	2007-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Iroquois	475	475	0	0
41222	The Southern Connecticut Gas Company	2008-Nov-01	2019-Oct-31	FT	Union Parkway Belt	Iroquois	9,656	9,656	0	0
41230	The Southern Connecticut Gas Company	2006-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Iroquois	34,567	34,567	0	0
41231	The Southern Connecticut Gas Company	2007-Nov-01	2018-Oct-31	FT	Union Parkway Belt	Iroquois	13,342	2,685	0	10,657
41223	Yankee Gas Services Company	2008-Nov-01	2019-Oct-31	FT	Union Parkway Belt	Iroquois	5,336	0	0	5,336
41236	Yankee Gas Services Company	2006-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Iroquois	42,642	0	0	42,642
41237	Yankee Gas Services Company	2007-Nov-01	2018-Oct-31	FT	Union Parkway Belt	Iroquois	20,334	0	0	20,334
						Iroquois Total	**668,662**	**231,465**	**0**	**437,197**
1066	1425445 Ontario Limited	1989-Jan-01	2013-Dec-31	FT	Empress	KPUC EDA	6,500	6,500	0	0
1138	1425445 Ontario Limited	1975-Apr-01	2013-Oct-31	STS	Union Parkway Belt	KPUC EDA	13,167	13,167	0	0
						KPUC EDA Total	**19,667**	**19,667**	**0**	**0**
2980	New York State Electric & Gas Corporation	1993-Nov-01	2013-Oct-31	FT	Empress	Napierville	4,775	0	0	4,775
2981	New York State Electric & Gas Corporation	1993-Nov-01	2013-Oct-31	FT	Empress	Napierville	3,805	0	0	3,805
						Napierville Total	**8,580**	**0**	**0**	**8,580**
42381	Consolidated Edison Company of New York, Inc.	2011-Nov-01	2016-Oct-31	FT	Kirkwall	Niagara Falls	31,651	31,651	0	0
35096	Yankee Gas Services Company	2008-Apr-01	2018-Mar-31	FT	Union Dawn	Niagara Falls	10,265	0	0	10,265
						Niagara Falls Total	**41,916**	**31,651**	**0**	**10,265**

CONTRACT DEMAND ENERGY (CDE) REPORT - Mainline

As Of Date: 2012-Sep-04

Service Type: FST, FT, FT-NR, FT-SN, LTWFS, STS

Contract Number	Service Requester	Contract Start Date	Contract End Date	Service Type	Primary Receipt	Primary Delivery	Contract Demand (GJ/d)	Operational Demand (GJ/d)	Shifted Qty (GJ/d)	Temp Assigned Qty (GJ/d)
33045	Vermont Gas Systems, Inc.	2007-Nov-01	2017-Oct-31	FT	Empress	Philipsburg	12,000	0	0	12,000
33556	Vermont Gas Systems, Inc.	2007-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Philipsburg	10,000	10,000	0	0
34490	Vermont Gas Systems, Inc.	2008-Apr-01	2013-Nov-30	FT	Empress	Philipsburg	6,500	6,500	0	0
34728	Vermont Gas Systems, Inc.	2008-Apr-01	2020-Mar-31	STS	Union Parkway Belt	Philipsburg	20,279	20,279	0	0
36188	Vermont Gas Systems, Inc.	2008-Nov-01	2018-Oct-31	FT	Union Parkway Belt	Philipsburg	10,000	1,855	0	8,145
36190	Vermont Gas Systems, Inc.	2008-Nov-01	2018-Oct-31	FT	Union Parkway Belt	Philipsburg	2,000	2,000	0	0
						Philipsburg Total	**60,779**	**40,634**	**0**	**20,145**
5044	Atlantic Power Limited Partnership	1994-Nov-01	2014-Oct-31	FT	Empress	TCPL NDA	7,536	0	0	7,536
						TCPL NDA Total	**7,536**	**0**	**0**	**7,536**
38101	Thorold CoGen L.P.	2009-Sep-01	2019-Aug-31	FT-SN	Kirkwall	Thorold CDA	49,500	49,500	0	0
						Thorold CDA Total	**49,500**	**49,500**	**0**	**0**
42925	TransGas Limited	2011-Nov-01	2012-Oct-31	FT	Empress	Transgas SSDA	10,000	10,000	0	0
						Transgas SSDA Total	**10,000**	**10,000**	**0**	**0**
20397	Canada Starch Operating Company Inc.	2003-Nov-01	2012-Dec-31	FT	Union Dawn	Union CDA	699	699	0	0
44088	J.P. Morgan Commodities Canada Corporation	2012-Apr-01	2015-Dec-31	FT	Empress	Union CDA	8,145	8,145	0	0
20270	Shell Energy North America (Canada) Inc.	2003-Nov-01	2013-Mar-31	FT	Union Dawn	Union CDA	79,129	79,129	0	0
19332	The Corporation of the City of Kitchener	2003-Sep-01	2013-Oct-31	FT	Union Dawn	Union CDA	8,000	0	0	8,000
32907	The Corporation of the City of Kitchener	2007-Nov-01	2012-Oct-31	FT	Empress	Union CDA	500	500	0	0
32908	The Corporation of the City of Kitchener	2007-Nov-01	2012-Oct-31	FT	Empress	Union CDA	500	0	0	500
32909	The Corporation of the City of Kitchener	2007-Nov-01	2012-Oct-31	FT	Empress	Union CDA	500	200	0	300
1142	Union Gas Limited	1992-Apr-01	2013-Dec-31	STS	Union WDA	Union CDA	3,150	3,150	0	0
1142	Union Gas Limited	1992-Apr-01	2013-Dec-31	STS	Union NDA	Union CDA	49,100	49,100	0	0
2776	Union Gas Limited	1993-Apr-01	2014-Jan-31	FT	Empress	Union CDA	3,699	99	0	3,600
6673	Union Gas Limited	1996-Nov-01	2013-Dec-31	FT	Empress	Union CDA	1,979	79	0	1,900
12430	Union Gas Limited	1999-Nov-01	2013-Oct-31	FT	Empress	Union CDA	13,149	340	0	12,809
20259	Union Gas Limited	2003-Nov-01	2013-Oct-31	FT	Union Dawn	Union CDA	60,000	60,000	0	0
22754	Union Gas Limited	2003-Nov-01	2013-Oct-31	FT	Empress	Union CDA	40,000	0	0	40,000
39928	Union Gas Limited	2010-Nov-01	2015-Dec-31	FT	Empress	Union CDA	12,500	0	0	12,500
42581	Union Gas Limited	2011-Nov-01	2013-Oct-31	FT	Union Parkway Belt	Union CDA	16,000	16,000	0	0
42582	Union Gas Limited	2011-Nov-01	2012-Oct-31	FT-NR	Union Parkway Belt	Union CDA	64,000	64,000	0	0
						Union CDA Total	**361,050**	**281,441**	**0**	**79,609**
20396	Canada Starch Operating Company Inc.	2003-Nov-01	2013-Dec-31	FT	Union Dawn	Union EDA	1,020	1,020	0	0
20398	Canada Starch Operating Company Inc.	2004-Jan-01	2013-Dec-31	FT	Union Dawn	Union EDA	490	490	0	0
29482	Dyno Nobel Canada Inc.	2006-Mar-30	2013-Oct-31	FT	Empress	Union EDA	950	950	0	0
35657	GreenField Ethanol Inc.	2008-Nov-01	2018-Oct-31	FT	Union Parkway Belt	Union EDA	2,000	2,000	0	0
5106	Husky Energy Marketing Inc.	1994-Jul-01	2014-Oct-31	FT	Empress	Union EDA	33,563	23,563	0	10,000
6570	Kingston CoGen Limited Partnership	1996-Oct-01	2016-Oct-31	FT	Empress	Union EDA	21,045	21,045	0	0
12870	Ontario Power Generation Inc.	1999-Nov-01	2013-Oct-31	FT	Empress	Union EDA	4,000	0	0	4,000
1048	Union Gas Limited	1989-Jan-01	2013-Dec-31	FT	Empress	Union EDA	50,426	10,156	0	40,270
1142	Union Gas Limited	1992-Apr-01	2013-Dec-31	STS	Union Parkway Belt	Union EDA	68,520	68,520	0	0
2744	Union Gas Limited	1993-Nov-01	2013-Oct-31	FT	Empress	Union EDA	8,675	8,675	0	0
29591	Union Gas Limited	2006-Nov-01	2016-Oct-31	FT	Union Parkway Belt	Union EDA	30,000	30,000	0	0
33559	Union Gas Limited	2007-Nov-01	2017-Oct-31	FT	Union Parkway Belt	Union EDA	5,000	5,000	0	0
						Union EDA Total	**225,689**	**171,419**	**0**	**54,270**
1049	Union Gas Limited	1989-Jan-01	2013-Dec-31	FT	Empress	Union NCDA	9,211	0	0	9,211
1052	Union Gas Limited	1989-Apr-01	2013-Oct-31	FT	Empress	Union NCDA	1,545	0	0	1,545
						Union NCDA Total	**10,756**	**0**	**0**	**10,756**
43625	Agrium	2012-Jan-01	2012-Dec-31	FT	Empress	Union NDA	1,700	1,700	0	0
13757	Atlantic Power Limited Partnership	2000-Feb-01	2016-Oct-31	FT	Empress	Union NDA	8,182	0	0	8,182
13758	Atlantic Power Limited Partnership	2000-Feb-01	2016-Oct-31	FT	Empress	Union NDA	8,182	0	0	8,182
6498	Iroquois Falls Power Corp.	1996-Sep-01	2016-Aug-31	FT	Empress	Union NDA	20,874	0	0	20,874
20547	Toromont Industries Ltd.	2003-May-01	2013-Apr-30	FT	Empress	Union NDA	374	374	0	0
1045	Union Gas Limited	1989-Jan-01	2013-Dec-31	FT	Empress	Union NDA	65,745	577	0	65,168
40444	Vale Canada Limited	2010-Nov-01	2012-Oct-31	FT	Empress	Union NDA	3,500	0	0	3,500
						Union NDA Total	**108,557**	**2,651**	**0**	**105,906**

CONTRACT DEMAND ENERGY (CDE) REPORT - Mainline

As Of Date: 2012-Sep-04

Service Type: FST, FT, FT-NR, FT-SN, LTWFS, STS

Contract Number	Service Requester	Contract Start Date	Contract End Date	Service Type	Primary Receipt	Primary Delivery	Contract Demand (GJ/d)	Operational Demand (GJ/d)	Shifted Qty (GJ/d)	Temp Assigned Qty (GJ/d)
43608	Active Energy Corp.	2012-Jan-01	2014-Dec-31	FT	SS. Marie	Union SSMDA	6,143	6,143	0	0
43607	Flakeboard Company Limited	2012-Jan-01	2013-Dec-31	FT	Empress	Union SSMDA	300	300	0	0
39703	Lake Superior Power Limited Partnership	2011-Jan-01	2013-Dec-31	FT	SS. Marie	Union SSMDA	10,100	10,100	0	0
1047	Union Gas Limited	1989-Jan-01	2013-Dec-31	FT	Empress	Union SSMDA	2,700	0	0	2,700
42229	Union Gas Limited	2011-Nov-01	2014-Oct-31	FT	SS. Marie	Union SSMDA	6,143	3,169	0	2,974
						Union SSMDA Total	**25,386**	**19,712**	**0**	**5,674**
44317	BP Canada Energy Group ULC	2012-Apr-01	2013-Mar-31	FT	St. Clair	Union SWDA	40,000	40,000	0	0
37099	Cargill Limited	2009-Jan-22	2014-Jan-31	FT	St. Clair	Union SWDA	10,125	10,125	0	0
44316	Direct Energy Marketing Limited	2012-Apr-01	2013-Mar-31	FT	Empress	Union SWDA	40,000	40,000	0	0
33196	Tenaska Marketing Canada, a division of TMV Corp.	2007-Nov-01	2014-Mar-31	FT	St. Clair	Union SWDA	30,000	30,000	0	0
43367	Tenaska Marketing Canada, a division of TMV Corp.	2011-Dec-01	2013-Mar-31	FT	St. Clair	Union SWDA	100,000	100,000	0	0
						Union SWDA Total	**220,125**	**220,125**	**0**	**0**
1046	Union Gas Limited	1989-Jan-01	2013-Dec-31	FT	Empress	Union WDA	39,880	3,150	0	36,730
						Union WDA Total	**39,880**	**3,150**	**0**	**36,730**
37017	Enbridge Gas Distribution Inc.	2009-Jan-12	2018-Oct-31	FT-SN	Union Parkway Belt	Victoria Square #2 CDA	85,000	85,000	0	0
37098	Portlands Energy Centre L.P.	2009-Jan-22	2013-Nov-30	FT-SN	Union Parkway Belt	Victoria Square #2 CDA	100,000	100,000	0	0
						Victoria Square #2 CDA Total	**185,000**	**185,000**	**0**	**0**
42926	TransGas Limited	2011-Nov-01	2012-Oct-31	FT	Empress	Welwyn	5,127	5,127	0	0
						Welwyn Total	**5,127**	**5,127**	**0**	**0**
						Grand Total	**4,723,323**	**3,094,631**	**0**	**1,628,692**

- CONTRACT DEMAND is equal to the current version contract demand plus the CD TEMP SHIFTED QTY in effect.
- OPERATIONAL DEMAND is equal to CONTRACT DEMAND minus CD TEMP SHIFTED QTY and CD TEMP ASSIGNED QUANTITY.
- CD TEMP SHIFTED QTY is equal to the Shifts in effect off of the originating FT contract.
- CD TEMP ASSIGNED QUANTITY is equal to the Temporary Assignments in effect off of the originating FT contract.
- 'Permanent Assignments' in effect are shown on the report as new FT contracts for the assignee.
- LTWFS (Long Term Winter Firm Service) quantity applies to the winter period only (Nov 1 to Mar 31).
- STS (Storage Transportation Service) quantities and all demand paths are stated for these contracts.
- Only current contract information is included in this report. I.e., no future dated contracts (or amendments) are posted.

UNDERTAKING JT2.4

UNDERTAKING

TR 2, page 57

To revise tables provided in Issue D3 Schedule 1.13 to net out the effect of removing spot purchases not needed as a result of having excess firm transport from January to March.

RESPONSE

For the 2013 Test Year the Company's gas cost budget was prepared assuming the current design criteria. Under the current design criteria the Company continues to forecast the need for 75,000 GJ's of TCPL STFT. The Test Year gas costs as filed do not include an assumption of discretionary purchases from January to March. Absent the 75,000 GJ's of STFT the as filed gas cost budget would have included an amount of discretionary purchases for January to March. However, since the as filed gas cost budget assumes the continued utilization of 75,000 GJ's of STFT the Company has forecast discretionary purchases to be displaced by utilization of this capacity. In other words the as filed unutilized capacity forecast of $2.8 million includes the net effect of backing off discretionary purchases and increasing utilization of the 75,000 GJ's of STFT.

Since the Test Year gas cost budget was filed assuming no discretionary purchases from January to March under the current design criteria there are no further discretionary purchases that could be displaced by increased utilization of the incremental 350,000 GJ's of STFT. This incremental STFT capacity is assumed to meet peak day demands only. Consequently the tables provided at Exhibit I, Issue D3, Schedule 1.13 do not have to be updated as requested. These tables were meant to provide an example of the cost consequences of procuring the incremental 350,000 GJ's of STFT to meet peak day demand under the proposed design criteria assuming the Company had to "call" on ten peaking bullets throughout the winter season.

Upon reviewing the tables provided at Exhibit I, Issue D3, Schedule 1.13, the Company realized a slight error in the calculation of the gas costs. The variable charge to the Eastern Zone was included in the derivation of demand charges. Under TransCanada's current toll design, variable charges are only incurred when capacity is utilized. Consequently the gas costs included in the tables are overstated by 80 days of variable charges. Updated tables are provided below. The net effect of removing the variable charges is to reduce overall costs of gas supply in the scenarios provided.

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

Central Weather Zone HDD/Design Criteria Sensitivity

Peak Day HDD	Incremental Gas Supply Required (gj/d)	Cost of Incremental Gas Supply ($ millions)	Cost of Incremental Capital Spending ($ millions)	Total Cost Associated with New Design Criteria ($ millions)
39.5 (Current)	0	0.00	0.00	0.00
40	32,288	6.93	0.00	6.93
40.5	64,576	13.87	0.00	13.87
41	96,863	20.80	0.00	20.80
41.5	129,151	27.74	0.00	27.74
42	161,439	34.67	0.00	34.67
42.5	193,727	41.61	0.05	41.66
43	226,014	48.54	0.17	48.71
43.7 (Requested)	271,217	58.25	1.63	59.88

Eastern Weather Zone HDD/Design Criteria Sensitivity

Peak Day HDD	Incremental Gas Supply Required (gj/d)	Cost of Incremental Gas Supply ($ millions)	Cost of Incremental Capital Spending ($ millions)	Total Cost Associated with New Design Criteria ($ millions)
45.1 (Current)	0	0.00	0.00	0.00
45.5	3,863	0.83	0.00	0.83
46	8,692	1.87	0.00	1.87
46.5	13,521	2.90	0.00	2.90
47	18,350	3.94	0.00	3.94
47.5	23,179	4.98	0.00	4.98
48	28,008	6.02	0.00	6.02
48.5	32,837	7.05	1.40	8.46
49	37,666	8.09	1.53	9.62
49.5	42,495	9.13	1.53	10.66
50	47,325	10.16	1.53	11.70
50.7 (Requested)	54,085	11.62	1.53	13.15

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

Niagara Weather Zone HDD/Design Criteria Sensitivity

Peak Day HDD	Incremental Gas Supply Required (gj/d)	Cost of Incremental Gas Supply ($ millions)	Cost of Incremental Capital Spending ($ millions)	Total Cost Associated with New Design Criteria ($ millions)
36.3 (Current)	0	0.00	0.00	0.00
37	3,602	0.77	0.00	0.77
37.5	6,175	1.33	0.00	1.33
38	8,748	1.88	0.00	1.88
38.5	11,321	2.43	0.00	2.43
39	13,894	2.98	0.00	2.98
39.5	16,467	3.54	0.00	3.54
40	19,040	4.09	0.56	4.64
40.5	21,613	4.64	0.56	5.20
41.2 (Requested)	25,215	5.42	0.56	5.97

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

UNDERTAKING JT2.5

UNDERTAKING

TR 2, page 61

To review TCPL STSN transportation service from Niagara or Kirkwall to the Niagara area to displace long-haul transport that otherwise would have gone there and use 50,000 gjs in the CDA as an alternative.

RESPONSE

STSN is a point-to-point transportation service provided by TCPL that allows for delivery from a receipt point (i.e., Niagara or Kirkwall) to a particular Gate Station. There is currently no TCPL STSN transportation service available from Niagara or Kirkwall to any gate station within EGD's Niagara region.

None of the gate stations within EGD's Niagara region can flow 50,000 Gj/day consistently throughout the winter period. In addition, the connectivity or integration of the distribution system within the Niagara region does not permit the movement of gas between gate stations. In order for this service to be a realistic alternative, Enbridge would have to build a substantial XHP lateral (essentially looping TCPL domestic line) in order to effectively move the gas to where it is required within the franchise area.

Therefore, STSN to a particular gate station within the Niagara Region is not feasible and the only viable solution is delivery to the broader CDA which provides the flexibility required to meet EGD's requirements.

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

UNDERTAKING JT2.6

UNDERTAKING

TR 2, page 65

To confirm that BGA balances flow to the PGVA and to explain whether they flow to system gas customers or all customers.

RESPONSE

The cost consequences of BGA dispositions are captured in the PGVA and are collected/refunded to all customers in accordance with the Company's Board approved cost allocation and rate design methodology.

For an illustration of BGA dispositions see the attachment from the Commodity Pricing, Load Balancing and Cost Allocation Methodologies for Natural Gas Distribution proceeding – EB-2008-0106, EGD Reply Argument pages 12 to 14 (attached).

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

(b) BGA Dispositions

21. FRPO's submissions address Enbridge's BGA disposition provisions that apply when a direct purchase customer allows its BGA balance to move outside of the prescribed tolerance. Enbridge's objective is to encourage direct purchase customers to manage their BGAs appropriately.[38] Enbridge makes available to customers a number of BGA management tools[39] and the EnTRAC system is very thorough in providing reports and alerts to customers about their BGA balances.[40] As long as a customer stays within the allowed tolerance of 20 times MDV, the customer is given 180 days after the end of the contract term to deal with any imbalance in the BGA.[41]

22. In the event that a direct purchase customer allows its BGA balance to move outside the prescribed tolerance, Enbridge will dispose of the (long or short) volume of gas that is over 20 times MDV at the end of the contract term. Also, if a customer does not deal with an imbalance within 180 days of the end of the contract term, Enbridge will dispose of the (long or short) volume of gas needed to rectify the imbalance.[42] These dispositions occur at prices that are intended as an incentive to direct purchase customers to manage their BGAs in an appropriate manner.[43] Disposition of a long BGA balance (*i.e.*, purchase of gas from the customer) is at 80% of the average Empress price over the contract year and disposition of a short BGA balance (*i.e.*, sale of gas to the customer) is at 120% of the average Empress price.[44]

23. FRPO apparently believes that some form of cross-subsidization results from Enbridge's treatment of BGA dispositions. Enbridge does not accept that any issue of cross-subsidization arises from incentives for appropriate management of BGA balances. To the extent that the incentive is fully effective, there would be no need to

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[38] 2Tr.144.
[39] 2Tr.144.
[40] 2Tr.135; 2Tr.143.
[41] 2Tr.133-134; 2Tr.142
[42] 2Tr.134.
[43] 2Tr.133.
[44] Ex. J2.3; 2Tr.142.

dispose of long or short BGA balances and there would be no cost implications by reason of penalties.[45]

24. In any event, though, FRPO concludes its submissions on this point by outlining a "remedy" that is, in fact, the practice currently followed by Enbridge. FRPO says that "a simple remedy would be for Enbridge to move the commodity cost to the system gas pool at the AECO price Imbedded in the PGVA and to allow the remaining economic value, after paying for UDC incurred, to accrue to the Load Balancing account".[46] As explained in the response to Undertaking J2.3, this is actually Enbridge's current methodology.[47]

25. A numerical example may help to illustrate the methodology described in the response to Undertaking J2.3. In order to make the example a simple one, one can assume that the Empress (AECO) price of gas is $10. With this assumption, dispositions of long and short BGA balances would be treated in the following manner:

Long BGA Balance (Enbridge purchases gas from the customer)

- The Empress price in the PGVA is $10;
- Enbridge purchases gas from the customer at 80% of the average Empress price over the contract year, or $8;
- The variance of $2 between the purchase price and the price embedded in the PGVA is credited to the commodity component of the BGA;
- This would have a negligible downward influence on the commodity component of the PGVA – while Enbridge's commodity purchases in the three years from January 2006 to December 2008 were in the range of $5 billion, the commodity impact of long BGA dispositions over that time period was approximately $14 million (or less than 0.3%).[48]

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[45] 2Tr.141-142.
[46] FRPO Submission, p. 12.
[47] Ex. J2.3.
[48] Ex. J2.3.

Short BGA Balance (Enbridge sells gas to the customer)

- The Empress price in the PGVA is $10;
- Enbridge sells gas to the customer at 120% of the average Empress price over the contract year, or $12;
- $10 recovers the cost of the commodity at the Empress price;
- The remaining $2 is credited to the load balancing component of the PGVA.[49]

26. This treatment of BGA dispositions mirrors the manner in which commodity and load balancing costs are reflected in rates.[50] There are a number of reasons why it would be inappropriate to change this methodology, such that, on the disposition of long BGA balances, the difference between the purchase price and the Empress price embedded in the commodity component of the PGVA would accrue to the load balancing component of the PGVA. Such a change would mean that the treatment of BGA dispositions would no longer be symmetrical with the manner in which commodity and load balancing costs are recovered in rates; it would have imperceptible monetary impact, because the amounts of BGA dispositions are so small compared to the gas costs recovered through rates; and it would allow customers that have not appropriately managed their BGAs to share in the penalties that are charged to them for not properly managing their BGAs.

IV. Points of Clarification

(a) MDV Re-establishment

27. IGUA's submission contains the following statement about the proposal by Enbridge to implement MDV re-establishment (as well as weather-normalized MDV establishment):

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[49] Ex. J2.3
[50] Ex. E1, p. 42, para. 141.

UNDERTAKING JT2.7

UNDERTAKING

TR 2, page 67

To provide the quantity of delivery service under different types listed in part(c) of Exhibit 1, Issue D2, Schedule 8.7 for the last three years

RESPONSE

The table below provides the quantity of long haul FT service (before assignments) and the quantity of long haul STFT service held by Enbridge Gas Distribution for each of the past three gas years.

Gas Year	Annual TCPL Long Haul FT Service[1]	Seasonal STFT Service	Term	Monthly STFT Service	Term	Weekly STFT Service	Term
2009/2010	291,130			75,000	Jan 1, 2010-Feb 28, 2010		
2010/2011	260,438	50,000	Nov 1, 2010-Mar 31, 2011	200,000	Dec 1, 2010-Feb 28, 2011	70,000 70,000	Mar 1, 2011-Mar 7, 2011 Mar 8, 2011-Mar 31, 2011
2011/2012	287,394	50,000	Nov 1, 2011-Mar 31, 2012	175,000 100,000	Dec 1, 2011-Feb 29, 2012 Jan 1, 2012-Mar 31, 2012		

Notes: [1] Annual long haul FT service as of November 1 of each gas year

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

UNDERTAKING JT2.8

UNDERTAKING

TR 2, page 74

To provide answers as to whether Enbridge puts on the public record the storage space and deliverability that it has, and whether it separates this out between utility and non-utility

RESPONSE

Enbridge posts all of the storage information required by the Board under the Storage and Transmission Access Rule (STAR) on the Enbridge website (under the "gas storage" tab). The capacity information (working gas, base gas, total storage, design peak withdrawal and design peak injection) are all aggregate numbers for the utility and non-utility customers.

In addition, all of the unregulated storage contracts are posted on the website as required by STAR. These requirements include:

- customer name
- contract identifier
- receipt/delivery point
- maximum storage quantity
- maximum firm daily injection/withdrawal
- effective/expiration dates
- affiliate (yes/no)

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

UNDERTAKING JT2.9

UNDERTAKING

TR 2, page 76

For Exhibit I, B1, Schedule 7.1, response to (d), split out three cost elements of monthly gas storage for volumes used and costs supplied.

RESPONSE

As per the response to Energy Probe Interrogatory #7.1 (Exhibit I, Issue B1, Schedule 7.1) there are three components that make up the average of average balance of gas in storage. They are 1) the value of gas in inventory held for purposes of meeting seasonal load balancing needs of system gas and direct purchase customers, 2) the impact of Western T-Service transportation costs, and 3) Storage Demand charges including associated fuel costs.

The average of average balance of gas in storage is $249.3 million as seen in the Impact Statement #1 (Exhibit M).

The average of averages balance is broken down as follows:	$ Millions
Gas in Storage (avg of avgs volume X PGVA Ref. price) – 1,109.3 10*6 m*3 X $194.098/10*3 m*3	174.6
Western T-Service	38.7
Demand & In Charges	36.0
Total	249.3

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

UNDERTAKING JT2.10

UNDERTAKING

TR 2, page 82

To advise whether TCPL tariff allows assignment of peak day supplies

RESPONSE

The TransCanada tariff does not allow for the assignment of STFT capacity. TransCanada STFT service does not provide the same general service flexibility as TransCanada FT service. Basic attributes of STFT service are provided below:

- Service priority is firm
- No renewal rights
- TransCanada will not build for service
- Diversions are not available
- Alternate receipt points are not available
- Shifts are not available
- RAM is not available
- Assignments are not available

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

UNDERTAKING JT2.11

UNDERTAKING

TR 2, page 88

On a monthly basis for the last 18 months, to provide the percentage of capacity in use at Lisgar and suction side of Parkway

RESPONSE

Temperature sensitive residential customers comprise over 90% of all customers on the Enbridge distribution system. Enbridge designs its supply portfolio to meet design conditions subject to upstream contractual and operational considerations. The distribution system is operated in a integrated manner and is designed to meet the seasonal and peak day demands of its customers and therefore operates at a low load factor. At peak or near peak conditions the load factor on these two interconnects will typically be at or near full capacity.

The table below provides the percentage of capacity utilized at the Parkway Consumers and Parkway Lisgar interconnections with Union Gas for the last 20 months. Data have not been normalized to design conditions. Maximum capacity at Parkway Consumers (the suction side of Parkway) is approximately 1.4 million GJ/d. Maximum capacity at Lisgar is approximately 0.8 million GJ/d. The operating agreement between Enbridge and Union stipulates an aggregate flow to both interconnects of a maximum of approximately 1.8 million GJ/d. Capacity utilization at these interconnects was low over the last heating season due to the mild winter experienced throughout the 2011/2012 heating season.

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

Monthly Capacity Utilization and Maximum Daily Capacity Utilization		
	Parkway/Lisgar Monthly	Parkway/Lisgar Maximum
Jan-11	57%	79%
Feb-11	54%	71%
Mar-11	44%	63%
Apr-11	30%	47%
May-11	15%	34%
Jun-11	11%	14%
Jul-11	9%	12%
Aug-11	8%	11%
Sep-11	8%	13%
Oct-11	19%	35%
Nov-11	27%	44%
Dec-11	38%	58%
Jan-12	46%	78%
Feb-12	43%	59%
Mar-12	29%	60%
Apr-12	24%	35%
May-12	12%	23%
Jun-12	10%	14%
Jul-12	10%	12%
Aug-12	10%	12%

Witnesses: K. Culbert
J. Denomy
J. Sarnovsky
D. Small

UNDERTAKING JT2.12

UNDERTAKING

TR 2, page 105

To provide any transcript of or correspondence with Mr. Daniel.

RESPONSE

The comments reported in the Calgary Herald article dated December 9, 2008, referenced in CME Interrogatory #2 at Exhibit I, Issue E2, Schedule 4.2, were obtained in an interview conducted with Mr. Daniel by Shaun Polczer of the Calgary Herald. The interview was verbal and no transcriptions were recorded.

Witnesses: K. Culbert
R. Fischer
M. Lister
D. Yaworsky

UNDERTAKING JT2.14

UNDERTAKING

TR 2, page 116

For Issue E2, Energy Probe Interrogatory No. 2, Schedule 7.2, to review the list of risks; and for each risk, state if they have increased since 2007; and, if so, to provide a reference for the increase

RESPONSE

The risk assessment table below should be considered in the context of EGD's and Concentric's view that the evaluation of Enbridge's proposed change in equity thickness must go beyond the simple question of whether or not risks have changed since its last application. EGD and Concentric believe the Board's policy in this regard should be evolved to allow for a response to shifts in market fundamentals external to the Company's own operations, and to provide relief if the previously awarded equity thickness no longer satisfies the Fair Return Standard. EGD and Concentric further believe that it would be unfair to establish that the only test to evaluate the appropriateness of the utility's equity ratio is whether or not its risks have increased or decreased since the last Board decision.

The table below represents EGD's and Concentric's assessment of various risk factors since 2007:

	Risks:	***Assessment of Risk since 2007***	***Comments***
1.	Infrastructure or Safety Issues	Increase	More and older physical assets = higher probability of infrastructure or safety issues Increased capital spending for safety and integrity
2.	Training	Increase	Larger workforce, more physical assets equates to a higher need for training
3.	Price of materials	Increase	Increased risk of higher future inflation
4.	Interest Rates or Utility Credit Spreads	Increase	Volatility in credit spreads reached peak in 2008, may increase again Interest rates have likely bottomed out and will likely increase
5.	Cost of labour	Increase	Increased risk of higher future inflation
6.	Insurance Costs	Increase	Insurance costs continue to increase at a pace faster than inflation since 2007
7.	Cost of Litigation	Increase	More and older physical assets = higher probability of infrastructure or safety issues & higher probability of litigation

Witnesses: K. Culbert
R. Fischer
M. Lister
D. Yaworsky
J. Coyne – Concentric
J. Lieberman - Concentric

Risks:	***Assessment of Risk since 2007***	***Comments***
8. Cost of bad debts	Increase	Poor economic conditions today compared to 2007: higher unemployment rate, more bankruptcies, foreclosures, business failures
9. Ability to generate other revenues as forecast	Increase	Greater uncertainty regarding the prospects for TS revenues
10. Economic Impacts on Volumes Generally	Increase	Average uses have continued to decline resulting in higher per unit costs, all else equal
11. Economic Impacts on Industrial Uses	Increase	With a stronger dollar than in 2007, this can have a material impact on Ontario's export business, and specifically on the manufacturing sector
12. Ageing Workforce	Increase	Compared to 2007, heightened imperative to hire and train replacements as current workforce retires
13. Technical, Safety, or Compliance Standards	Increase	Greater requirements under applicable technical, safety or compliance standards
14. Operational Risks associated with underground facilities	Increase	Greater system size and complexity
15. Third party damages	Increase	Greater system size and complexity
16. Employee Health and Safety	Increase	Greater workforce = higher risk of employee health and safety Aging workforce
17. Environment and Physical risks of ruptured or leaking infrastructure	Lower	Number of leaks per year is slightly lower than in 2007
18. Weather	Neutral	Weather may be just as variable now as it was in 2007
19. Demand for gas across North America	Increase	Total demand for natural gas in North America continues to increase
20. Availability and Access to Supply	Lower price risk	Greater production from Shale Gas
21. Storage Spreads	Increase	Lower storage spreads threaten the ability to generate TS revenues
22. Price of Fuel Oil or Other Energy Alternatives	Lower price risk	Gas prices are lower than in 2007; uncertainty regarding whether this will be maintained for the long run
23. Advancement of other technologies	Neutral	Technologies remain relatively comparative now and in 2007
24. Regulatory or legislative impacts	Increase	Several examples of government interference in Ontario energy markets since 2007 Uncertainty around possible next generation IRM including form or term length

Witnesses: K. Culbert
R. Fischer
M. Lister
D. Yaworsky
J. Coyne – Concentric
J. Lieberman - Concentric

UNDERTAKING JT2.15

UNDERTAKING

TR 2, page 121

To reconcile the August and the September answers to Interrogatory E2, 7.3.

RESPONSE

Attached is a reconciliation and explanation of the change in utility income and the deficiency amount between the August and September responses to Interrogatory E2, Schedule 7.3.

Witnesses: K. Culbert
R. Fischer
M. Lister
D. Yaworsky

UNDERTAKING JT2.16

UNDERTAKING

TR 2, page 139

To update two VECC Interrogatories, E2, 20.1 and 20.3.

RESPONSE

The Company has filed updated Interrogatories for Exhibit I, Issue E1, Schedules 20.1 and 20.3.

As can be seen in reviewing pages 138 and 139, Lines 4 and 23 of the Transcript from September 6, 2012 of the Technical Conference, the discussion between the Company witness and the intervenor was about updating issue E1 Interrogatories not issue E2 Interrogatories.

Witnesses: K. Culbert
R. Fischer
M. Lister
D. Yaworsky
J. Coyne – Concentric
J. Lieberman - Concentric

UNDERTAKING JT2.18

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TR 2, page 150

To map risks listed in Exhibit E2, Schedule 20.1, Appendix B, page B2 to the risks in the May 12 DBRS report

RESPONSE

Ten Key Criteria used by DBRS to determine regulatory risk	Risks Analyzed By Concentric in Appendix B, page B-2	Risks Analyzed by Concentric Elsewhere in Report	Risk Not Addressed by Concentric Report
Deemed Equity		Subject matter of Concentric Evidence, analysis primarily found on pp 28-33, and Table 14 p. B-1, of Concentric's Evidence	
Allowed ROE		Analysis primarily found on p 31 of Concentric's Evidence	
Energy Cost Recovery	Analysis of Purchased Gas Cost Adjustment, Appendix B, pp. B-2 – B-5.		
Cost of Service vs. Incentive Regulation Mechanism			Not specifically analyzed but Concentric agrees with DBRS that Incentive Regulation increases risk for the utility.
Capital Cost Recovery	Analysis of Test Year and CWIP, Appendix B, pp. B-2 to B-6.		
Political Interference			Not analyzed by Concentric
Retail Rate			Not analyzed by Concentric
Stranded Cost Recovery	Analysis of Revenue Stabilization addresses certainty and timing of cost recovery, Appendix B, pp. B-2 – B-6		
Rate Freeze			Not analyzed by Concentric
Market Structure (Deregulation)			Not analyzed by Concentric

Witnesses: K. Culbert
R. Fischer
M. Lister
D. Yaworsky
J. Coyne – Concentric
J. Lieberman - Concentric

UNDERTAKING JT2.19

UNDERTAKING

TR 2, page 154

To map Gaz Met on Appendix B, Figure 10

RESPONSE

		Test Year	Purchased Gas Adjustment	Revenue Stabilization	CWIP	Overall
	Enbridge Gas Distribution Inc.	●	●	◑	◔	◕
	North American Proxy Group Average	◕	◕	◕	◕	◕
Canada	ATCO Gas	●	●	◑	◕	◕
Canada	FortisBC Energy Inc.	●	●	●	◕	●
Canada	Gaz Met	●	●	●	●	●
Canada	Union Gas Ltd.	●	●	◑	◔	◕
United States	Atlanta Gas Light Company	●	●	●	●	●
United States	Brooklyn Union Gas Company	●	●	●	◕	●
United States	Northern Illinois Gas Company	●	●	◑	●	●
United States	Piedmont Natural Gas Company, Inc.					
United States	- North Carolina	○	◑	●	●	◕
United States	- South Carolina	○	◑	●	●	◕
United States	- Tennessee	●	◑	◑	●	◕
United States	Questar Gas Company					
United States	- Utah	●	●	●	◕	●
United States	- Wyoming	◑	●	●	◕	◕
United States	Southern California Gas Company	●	●	●	◕	●
United States	Washington Gas Light Company					
United States	- District of Columbia	●	●	◑	●	●
United States	- Maryland	○	●	●	●	◕
United States	- Virginia	○	●	●	●	◕

Witnesses: K. Culbert
R. Fischer
M. Lister
D. Yaworsky
J. Coyne - Concentric
J. Lieberman - Concentric

Key:	
Test Year:	
●	Fully forecasted test year
◐	Partially forecasted test year
○	Historic test year
Purchased Gas Adjustment:	
●	Rates adjusted more than semiannually
◐	Rates adjusted less than semiannually
○	No purchased gas adjustment
Revenue Stabilization:	
●	Decoupling and weather normalization, or SFV rate design
◐	Conservation tariff or weather normalization
○	No revenue stabilization
Return on CWIP	
●	Full return earned on CWIP; or CWIP allowed in rate base
◕	AFUDC includes long term debt rate and equity component
◐	IDC at long term debt rate
○	No performance-based rates

Witnesses: K. Culbert
R. Fischer
M. Lister
D. Yaworsky
J. Coyne - Concentric
J. Lieberman - Concentric

Proxy Company	Rating	Justification	Source
Enbridge Gas Distribution Inc.			
Test Year	●	Incentive Plan provides for many forward looking elements	2008 IR Settlement, p. 38
Purchased Gas Adjustment	●	Quarterly purchased gas adjustment mechanism	2010 Annual Information Form p. 4
Revenue Stabilization	◑	AUTVA and LRAM but no protection against weather	2010 Annual Information Form p. 5
CWIP	◔	EGDI recovers IDC at short term debt rate for CWIP	OEB Letter re.: IDC for CWIP, EB-2006-0117, November 28, 2006
ATCO Gas			
Test Year	●	Forecast Test Year	AUC Decision 2011-2013
Purchased Gas Adjustment	●	Risk mitigated - no commodity exposure	AUC Decision 2011-2013
Revenue Stabilization	◑	Weather deferral only	AUC Decision 2011-2013
CWIP	◕	AFUDC w/ long term debt rate and equity component	ATCO Group letter re.: AFUDC vs. IDC accounting, October 6, 2008
FortisBC Energy Inc.			
Test Year	●	Forecast test year	2010 Annual Report, p. 10
Purchased Gas Adjustment	●	Quarterly purchased gas cost adjustment mechanism	2010 Annual Report, p. 10
Revenue Stabilization	●	Full decoupling for residential and small commercial customers	2010 Annual Report, p. 10
CWIP	◕	AFUDC w/ long term debt rate and equity component	Fortis Inc. 2010 Annual Report, p. 81
Gaz Met			
Test Year	●	Revenue required based on forward test year	Incentive Regulation Plan R-3599-2006, p. 12
Purchased Gas Adjustment	●	Automatic monthly adjustment mechanisms for gas costs	Valener Inc., Annual Information Form, September 30, 2011, p. 33
Revenue Stabilization	●	Variances due to conservation and weather are treated as exogenous variables in IR Plan	Incentive Regulation Plan, R-3599-2006, p. 10, 14
CWIP	●	Rate base includes construction work in progress	R-3752-2011
Union Gas, Ltd.			
Test Year	●	Incentive Plan provides for many forward looking elements	2010 Annual Report p. 31
Purchased Gas Adjustment	●	Quarterly purchased gas adjustment mechanism	2010 Annual Report p. 8
Revenue Stabilization	◑	Protected against declining average use but not against weather	2010 Annual Report p. 8, 16-17
CWIP	◔	Union recovers IDC at short term debt rate for CWIP	OEB Letter re.: IDC for CWIP, EB-2006-0117, November 28, 2006
Atlanta Gas Light Company			
Test Year	●	Forecast test year	GPC, Final Order, Docket No. 31647, Nov. 3, 2010, pg. 3
Purchased Gas Adjustment	●	Risk does not exist for AGL since it does not sell gas to customers	AGL Resources Inc. 2010 10-K, pp. 5-6
Revenue Stabilization	●	Straight Fixed Variable rate design, fixed cost recovery is entirely mitigated	AGL Resources Inc. 2010 10-K, p. 5
CWIP	●	AGL earns cost of debt and equity capital on construction projects	AGL Resources Inc. 2010 10-K, p. 62
The Brooklyn Union Gas Company			
Test Year	●	Rates based on forecast rate base, revenues and expenses	NYPSC, Case No. 06-G-1185, Order, December 21, 2007, pg. 29
Purchased Gas Adjustment	●	Monthly cost of gas surcharge and variance account	Schedule for Gas Service, Leaf No. 66, Leaf No. 79.2 and Leaf No. 79.6
Revenue Stabilization	●	Full decoupling mechanism reconciles actual billed service revenues to allowed	Schedule for Gas Service, Leaf No. 138.52
CWIP	◕	CWIP is included in calculation of rate base	Joint Proposal Case 06-M-0878, Appendix 3

Witnesses: K. Culbert
R. Fischer
M. Lister
D. Yaworsky
J. Coyne - Concentric
J. Lieberman - Concentric

Proxy Company	Rating	Justification	Source
Northern Illinois Gas Company			
Test Year	●	Forecast test year	ICC, Docket No. 08-0363, Order, March 25, 2009, pp. 91, 94
Purchased Gas Adjustment	●	Monthly gas cost adjustment, subject to subsequent prudence reviews	Northern Illinois Gas Company Schedule of Rates, Sheet No. 58
Revenue Stabilization	◑	Recovers fixed costs through customer charge (80% residential and 50% C&I)	ICC, Docket No. 08-0363, Order, March 25, 2009, pp. 91, 94
CWIP	●	CWIP included in rate base	ICC, Docket No. 08-0363, testimony of Rocco J. D'Alessandro
Piedmont Natural Gas Company, Inc. NC			
Test Year	○	Historical test period adjusted for known and measureable changes	NCUC, Docket No. G-9, Sub 550, Order, October 24, 2008, pg. 5
Purchased Gas Adjustment	◑	Company may request rate change as required for gas costs	North Carolina Tariff & Service Regulations, Appendix A
Revenue Stabilization	●	Margin decoupling tracker, recovers margin variance due to volume	Piedmont Natural Gas Company, Inc. 2010 Form 10-K, pg. 72
CWIP	●	Company uses overall rate of return as AFUDC rate	Docket No. G-9, Sub 550
Piedmont Natural Gas Company, Inc. SC			
Test Year	○	Historical test year	PSC of SC, Docket No. 2002-63-G, Order No. 2002-761, Nov. 1, 2002, pg. 7
Purchased Gas Adjustment	◑	Recovery of gas costs subject to annual gas cost proceedings	South Carolina Tariff & Service Regulations, Appendix A
Revenue Stabilization	●	Rate stabilization adjustment mechanisms, effectively margin decoupling	Piedmont Natural Gas Company, Inc. 2010 Form 10-K, pp. 25, 73
CWIP	●	Original cost rate base includes construction work in progress	Docket No. 2010-7-G
Piedmont Natural Gas Company, Inc. TN			
Test Year	●	Forecast test year	Tennessee Regulatory Authority, Docket No. 03-00313, Order, July 15, 2004, p. 7
Purchased Gas Adjustment	◑	Purchased gas cost adjustment included in rates annually and recover/refund variances	Tennessee Tariff & Service Regulations, Rate Schedule No. 311
Revenue Stabilization	◑	Weather normalization adjustment	Piedmont Natural Gas Company, Inc. 2010 Form 10-K, pp. 24
CWIP	●	Construction work in progress included as an addition to rate base	Docket No. 03-00313
Questar Gas Company - UT			
Test Year	●	Forecast test year	Utah Code § 54-4-4
Purchased Gas Adjustment	●	Gas costs recovered at least semiannually through surcharge	Questar Gas Company Tariff for Gas Service in the State of Utah, Page 2-6
Revenue Stabilization	●	Weather normalization adjustment and conservation enabling tariff	Questar Gas Company Tariff for Gas Service in the State of Utah
CWIP	◕	AFUDC rate earned on CWIP	Questar Corporation 2010 10-K, pg. 54
Questar Gas Company - WY			
Test Year	◑	Partially forecast test year	Wyoming PSC, Docket 30010-94-GR-08, Record No. 11846, Jun 17, 2009, p. 2
Purchased Gas Adjustment	●	Gas costs recovered at least semiannually through surcharge	Questar Gas Tariff for Gas Service in the State of Wyoming, pp. 12 - 14
Revenue Stabilization	●	Weather normalization adjustment and conservation enabling tariff	Questar Gas Company Tariff for Gas Service in the State of Wyoming
CWIP	◕	AFUDC rate earned on CWIP	Questar Corporation 2010 10-K, pg. 54
Southern California Gas Company			
Test Year	●	Forecast test year	General SoCal Gas Rate Application No. 10-12-006, December 15, 2010
Purchased Gas Adjustment	●	Monthly purchased gas adjustment	SoCal Tariff, Cal. P.U.C. Sheet No. 46487-G & Cal. P.U.C. Sheet No. 42246-G
Revenue Stabilization	●	Gas company is effectively decoupled through various balancing accounts	SoCal Tariff, Cal. P.U.C. Sheet No. 47158-G & Cal. P.U.C. Sheet No. 47158-G
CWIP	◕	AFUDC rate earned on CWIP	Sempra Energy 2010 10-K, p. 156

Witnesses: K. Culbert
R. Fischer
M. Lister
D. Yaworsky
J. Coyne - Concentric
J. Lieberman - Concentric

Proxy Company	Rating	Justification	Source
Washington Gas Light Company - DC			
Test Year	●	Forecast test year	Application of Washington Gas Light Company, No. 1054, December 21, 2006
Purchased Gas Adjustment	●	Quarterly gas adjustment	Tariff Rate Schedules and General Service provisions No. 44, 45, 48, and 51
Revenue Stabilization	◑	Weather derivatives to hedge weather risk	WGL Holdings, Inc. 10-Q, June 30, 2011, p. 20
CWIP	●	Commission allows CWIP in rate base under certain conditions	Order in Case No. 1016
Washington Gas Light Company - MD			
Test Year	○	Historical test year	PSC of MD, Case No. 9104, Proposed Order, October 5, 2007, pg. 8
Purchased Gas Adjustment	●	Quarterly adjustment recovered annually in rates	Tariff Rate Schedules and General Service Provisions, Page No. 70, 71 and 73
Revenue Stabilization	●	Revenue normalization adjustment - full decoupling mechanism	WGL Holdings, Inc. 2010 10-K, p. 4
CWIP	●	13-month average CWIP is included in rate base	Case No. 9104 references precedent in Case No. 8959
Washington Gas Light Company - VA			
Test Year	○	Historical test year with known and measureable changes	Application Washington Gas Light Co., No. PUE-2006-00059, Sept 2006, p. 4
Purchased Gas Adjustment	●	Quarterly adjustment recovered annually in rates	Tariff Rate Schedules and General Service Provisions, Page No. 75, 76, 77 and 79
Revenue Stabilization	●	Conservation / Efficiency (CARE) Adjustment and Weather Normalization Adjustment	WGL Holdings, Inc. 10-Q, June 30, 2011, pg. 32; and 2010 10-K p. 4
CWIP	●	SCC allows CWIP in rate base for facilities that will be operable within 1 yr of test year	RRA, Construction Work In Progress, Special Report, April 7, 2009

Use the following numbers to produce a given Harvey Ball:
● 4
◕ 3
◑ 2
◔ 1
○ 0

Witnesses: K. Culbert
R. Fischer
M. Lister
D. Yaworsky
J. Coyne - Concentric
J. Lieberman - Concentric

UNDERTAKING JT2.20

UNDERTAKING

TR 1, page 154

To inquire how many of the Canadian utilities have DSM programs and also are able to have access to a shared savings mechanism incentive

RESPONSE

Utility	**Jurisdiction**	**DSM Program**	**DSM Incentive Mechanism**	**Reference**
ATCO Gas	Alberta	ATCO EnergySense	None	*AUC Decision 2011-450*, December 5, 2011, page 150[i]
Enbridge Gas Distribution Inc.	Ontario	2012-2014 Demand Side Management Plan	Maximum incentive for 2012 is $10.45 million[ii]	*Decision and Order on Unsettled Issue*, EB-2011-0295, February 9, 2012
FortisBC Energy Inc.	British Columbia	Energy Efficiency and Conservation Program	None	*Energy Efficiency and Conservation Application Decision*, April 16, 2009 and *Energy Efficiency and Conservation Program – 2011 Annual Report*
Gaz Métro	Québec	Global Energy Efficiency Plan (GEEP)	Target reward of $4 million[iii]	*Performance Incentive Mechanism*, R-3599-2066, pages 27-28
Union Gas Ltd.	Ontario	2012-2014 Demand Side Management Plan	Maximum incentive for 2012 is $10.45 million[iv]	*Decision and Order on Settlement Agreement*, EB-2011-0327, February 21, 2012

[i] "Consequently, the Commission concludes that DSM was not intended by the legislature to be among the functions of a gas distributor… If the legislative scheme does not provide for DSM activities to be carried out by a gas distributor, that is sufficient to conclude that DSM activities would not result in just and reasonable rates and should be denied… The Commission denies AG's request to include in revenue requirement for the test years all

Witnesses: K. Culbert
R. Fischer
M. Lister
D. Yaworsky
J. Coyne – Concentric
J. Lieberman - Concentric

costs associated with current and proposed DSM activities. The Commission directs that all DSM related costs, both capital and operating, be removed from rate base and revenue requirement for the test years."

[ii] *Demand Side Management Guidelines for Natural Gas Utilities* dated June 30, 2011 dictate that the maximum incentive for 2012 is $9.5 million. Targets are established for each DSM program and no incentive is provided for achieving a weighted score of less than 50%. To encourage performance beyond the 100% target level, 40% of the available incentive is provided for a weighted score of 100% and the remaining 60% is provided for a weighted score at 150% of the DSM targets. Per the *Decision and Order on Unsettled Issue* in EB-2011-0295 dated February 9, 2012, the Board awarded a maximum incentive for 2012 of $10.45 million based on a total DSM budget of $30.91 million which includes a 10% increase in low-income DSM programs and explains the 10% increase in the maximum incentive over $9.5 million.

[iii] The GEEP performance incentive formula compensates for the disincentives of implementing DSM programs that are not neutralized by the Exogenous Factor for volume variations. The target to receive the full incentive of $4 million is 24,000,000 m^3 per year (annualized volume of measures implemented in the year), starting with the 2007-2008 rate year. The target will be cumulative thereafter, for example the target in 2008-2009 will be 48,000,000 m^3 and 72,000,000 m^3 in 2009-2010 etc. If the target is partially achieved, then Gaz Métro is entitled to a prorated portion of the $4 million.

[iv] *Demand Side Management Guidelines for Natural Gas Utilities* dated June 30, 2011 dictate that the maximum incentive for 2012 is $9.5 million. Targets are established for each DSM program and no incentive is provided for achieving a weighted score of less than 50%. To encourage performance beyond the 100% target level, 40% of the available incentive is provided for a weighted score of 100% and the remaining 60% is provided for a weighted score at 150% of the DSM targets. Per the *Partial Decision on Settlement Agreement*, in EB-2011-0327 dated February 8, 2012, the Board awarded a maximum incentive for 2012 of $10.45 million based on a total DSM budget of $30.954 million which includes a 10% increase in low-income DSM programs and explains the 10% increase in the maximum incentive over $9.5 million.

Witnesses: K. Culbert
R. Fischer
M. Lister
D. Yaworsky
J. Coyne – Concentric
J. Lieberman - Concentric

UNDERTAKING JT2.21

UNDERTAKING

TR 1, page 161

To confirm whether meters have less accuracy at very low flows and much more accuracy at medium to high flows.

RESPONSE

All else being equal, it is confirmed that meters in general have less accuracy in terms of percentage at very low flows (volumes) than the meters at medium to high flows. This is based upon the industry's metering technology that the Company cannot control.

As mentioned in Exhibit D2, Tab 6, Schedule 1, the Company calibrates and maintains measurement equipment with the objective of keeping both low flows and high flows metering variations within Measurement Canada's mandated tolerances. In fact, the Company's own meter accuracy policy even requires all of the new or re-worked meters to be calibrated within the tolerance level of +/-0.3% which is even lower than the tolerance level of +/-1% as prescribed by Measurement Canada.

Witness: I. Chan

UNDERTAKING JT2.22

UNDERTAKING

TR 1, page 165

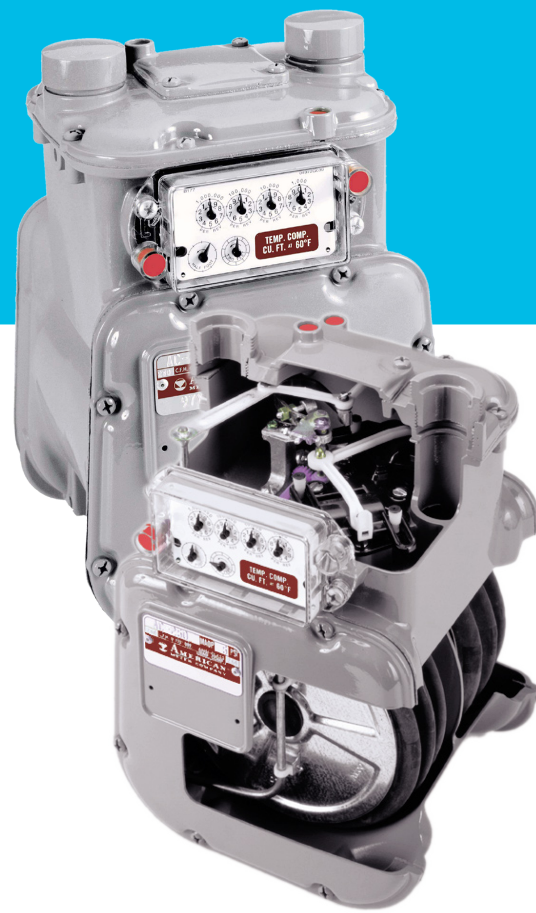
To provide manufacturer's accuracy curve for residential and small commercial meters.

RESPONSE

Please find attached a file which illustrates the manufacturer’s accuracy curve for residential and small commercial meters. As mentioned in response to Exhibit JT2.21, the Company calibrates and maintains measurement equipment with the objective of keeping all customer metering variations within Measurement Canada’s mandated tolerances.

Witness: I. Chan

AC-250 Diaphragm Meter



The standard for measuring a variety of hydrocarbon gases at pressures up to 10 PSIG and flow rates up to 250 cubic feet per hour

Features

- Die-cast aluminum case
- Oil-impregnated, self-lubricating bushings
- Molded, convoluted diaphragms for smooth operation and long life
- Rigid, reinforced flag rods for positive alignment and sustained accuracy
- Graphite-filled phenolic valves to minimize wear
- Long-life, low friction, grommet seals
- Single coat polyester primer with high solids polyurethane top coat
- Security seals that indicate tampering

Advantages

- Temperature compensation available from -30°F to 140°F (-34°C to 60°C)
- 250 SCFH (7.1 m^3/h) (0.60 specific gravity gas) at 1/2-inch W.C. differential
- AMR/AMI compatibility
- Meets ANSI B109.1 specifications
- Measurement Canada accredited

Applications

The Elster American Meter class AC-250 is the industry's most cost-effective gas meter for residential and small commercial applications. It is unequaled for accuracy retention and for life cycle maintenance economies.

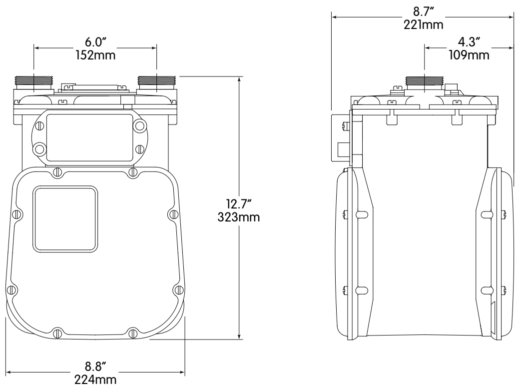
Options

- Regular or Temperature Compensated
- Pointer or odometer index
- 1ft^3, 2ft^3, or 0.05m^3 drive
- 10 LT, 20 LT, 30 LT, and other connection sizes
- 5 or 10 PSIG (345 or 690 mbar) Maximum Allowable Operating Pressure (MAOP)
- Pressure compensating indexes
- Standard or UV protected index covers
- Meter bars
- Connection sets
- Remote Volume Pulsers

elster
American Meter

AC-250 Diaphragm Meter

Weight = 12 lbs

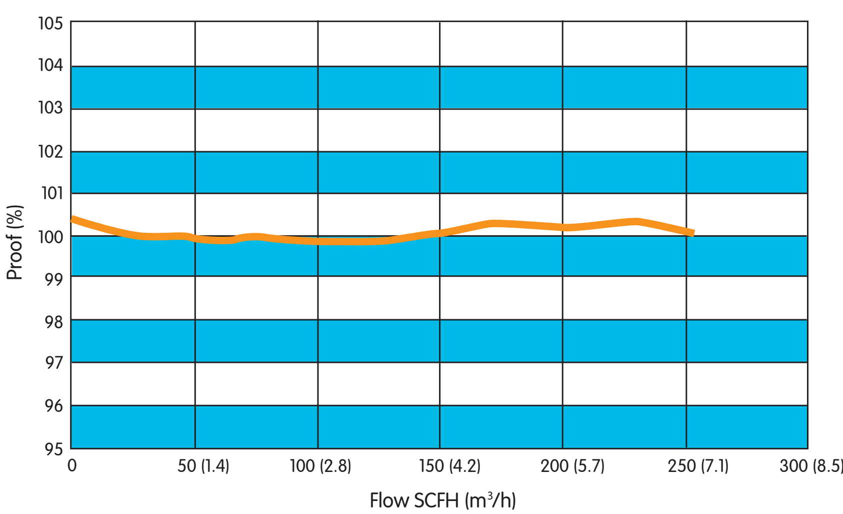


Capacities (0.60 specific gravity gas)

Line Pressure PSIG (mbar)	Differential Inches W.C. (mbar)	SCFH (m³/h)
0.25 (17)	1/2 (1.2)	250[1,2] (7.1)
1 (69)	2 (5)	583 (16.5)
2 (138)	2 (5)	600 (17.0)
5 (345)	2 (5)	656 (18.8)
10 (690)	2 (5)	742 (21.0)

1 - Propane - 158 SCFH (4.5 m^3/h)
2 - Butane - 138 SCFH (3.9 m^3/h)

AC-250 Proof Curve



About Elster Group

A world leader in advanced metering infrastructure, integrated metering, and utilization solutions to the gas, electricity and water industries. Elster's metering and system solutions reflect over 170 years of knowledge and experience in measuring precious resources and energy.

Elster provides solutions and advanced technologies to help utilities more easily, efficiently and reliably obtain and use advanced metering intelligence to improve customer service, enhance operational efficiency, and increase revenues. Elster's AMI solutions enable utilities to cost-effectively generate, deliver, manage, and conserve the life-essential resources of gas, electricity, and water.

Elster has a staff of over 7,500 serving customers globally in North America, Central America, South America, Europe, Asia, Africa and the Middle East.

ISO 9001:2000

QMI REGISTERED

Certification No. 006697

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EAM-DS3535.6-EN-P - November 2008
Supersedes EAM-DS3535.5-EN-P

UNDERTAKING JT2.23

UNDERTAKING

TR 1, page 166

To provide typical reason for a meter failing.

RESPONSE

As stated in Exhibit D2, Tab 6, Schedule 1, page 5, Paragraph 13, if a meter's accuracy has deteriorated, the meter is replaced. Meter accuracy is monitored on a regular basis in accordance with the Measurement Canada standard since the metering technology is beyond the Company's control. Based upon 2011 actual data, there were only 177 doubtful meters which was merely 0.01% of the Company's total 1.96 million customers. All of the doubtful meters are replaced. A sample of these meters is required to be further analyzed and tested for performance management. 70% of the doubtful meters were sampled and of those approximately 50% were over-registered and under-registered. Therefore, it appears that over-registering or under-registering is a typical reason for a meter failure.

Witness: I. Chan

UNDERTAKING JT2.24

UNDERTAKING

This Undertaking number was not used.

UNDERTAKING JT2.25

UNDERTAKING

TR 1, page 173

To confirm whether roughly half the gas delivered in aggregate through the year goes directly to the meter for consumption and the other half goes to storage for balancing purposes.

RESPONSE

Not confirmed.

The assumption that half the gas delivered in aggregate through the year goes to the meter for consumption and the other half goes to storage is incorrect.

In fact, approximately 75% of the gas delivered through the year goes to the meter for consumption and 25% of it goes to storage. The amount injected into storage will then be withdrawn the following winter to supplement deliveries to meet gas demand.

Unaccounted for Gas is the difference between the gas delivered into the distribution system being billed by the third party transmission pipelines (i.e., TransCanada Pipelines Limited (“TCPL”), and Union Gas Limited (“Union”)) and the gas measured out of the utility system. Therefore, the volumes that go to storage for balancing purposes prior to delivering into the distribution system are not relevant to the Unaccounted for Gas calculation.

Witnesses: I. Chan
D. Small

UNDERTAKING JT2.26

UNDERTAKING

TR 1, page 180

To provide reference to NGEIR proceeding on forecast for unaccounted-for gas for bundled and unbundled customers

RESPONSE

The reference should actually be to EB-2005-0001 (2006 Test Year), not to the NGEIR proceeding.

In EB-2005-0001 the Company proposed to include the Test Year forecast unaccounted for gas percentage in the Rate 125 rate schedule for ease of reference. Prior to this change in 2006, the unaccounted for gas provision of Rate 125 was as follows:

> The Applicant is required to provide the Company with Unaccounted for Gas equal to the forecast system average percentage times the volume that the Applicant is required to deliver to the Company. In the case of dedicated facilities where volume is measured from a custody transfer meter, the Unaccounted for Gas volume requirement is not applicable.

A copy of the proposed changes to the unaccounted for gas provision from EB-2005-0001 is attached to this undertaking response.

Parties reached a complete settlement on the proposed changes to the Company's Rate Handbook in the EB-2005-0001 proceeding.

The wording of the unaccounted for gas provision has not changed since the EB-2005-0001 proceeding.

Witnesses: I. Chan
K. Culbert
A. Kacicnik
S. Kancharla
M. Suarez

RATE NUMBER: **125**	**EXTRA LARGE FIRM TRANSPORTATION SERVICE**

APPLICABILITY:

To any Applicant who enters into a Service Contract with the Company to use the Company's natural gas distribution network for the transportation, to a single terminal location ("Terminal Location"), of a specified maximum daily volume ***(Contract Demand)*** of natural gas of not less than ***600,000 cubic metres.***

CHARACTER OF SERVICE:

Service shall be firm except for events as specified in the Service Contract including force majeure. The Applicant shall not take a volume of gas at the Terminal Location that varies, in any day, by more than two percent (2%) from the Delivered Volume.~~The hourly volume shall not exceed five percent~~ ~~***(5.0%)***~~ ~~of the Delivered Volume,~~ ~~***4.2% of the Maximum Daily***~~ ~~Volume without the Company's prior consent~~. ***The Contract Demand shall be 24 times the Hourly Demand, and the Applicant shall not exceed the Hourly Demand.***

RATE:

The following rates and charges, as applicable, shall apply for deliveries to the Terminal Location.

Demand Charge

Per cubic metre of Contract Demand per month	**8.4589 ¢/m³**
Direct Purchase Administration Charge	**$480.00 Per Year***
* billed in the first month of the contract year.	
Forecast Unaccounted For Gas Percentage	***0.3%***

AUTHORIZED DEMAND OVERRUN:

The following Authorized Demand Overrun Rate is applied to any quantities of gas transported in excess of the Contract Demand. Overrun will be authorized by the Company at its sole discretion.

Automatic authorization of transportation overrun will be given in the case of Dedicated ***Service*** to the Terminal Location provided that pipeline capacity is available ***and subject to a maximum volume as specified in the Service Contract.***

Authorized Demand Overrun Rate	**0.28 ¢/m³**

The Authorized Demand Overrun Rate may be applied to commissioning volumes at the Company's sole discretion, for a contractual period of not more than one year, as specified in the Service Contract.

MINIMUM BILL: ***See Terms and Conditions of Service***

TERMS AND CONDITIONS OF SERVICE:

1. The provisions of PARTS III and IV of the Company's **HANDBOOK OF RATES AND DISTRIBUTION SERVICES** apply, as contemplated therein, to service under this Rate Schedule.

2. ~~The Applicant is required to provide the Company with Unaccounted for Gas equal to the forecast system average percentage times the volume that the Applicant is required to deliver to the Company. In the case of dedicated facilities where volume is measured from a custody transfer meter, the Unaccounted for Gas volume requirement is not applicable.~~
The Applicant is required to deliver to the Company on a daily basis the sum of: (a) the volume of gas to be delivered to the Applicant's Terminal Location; and (b) a volume of gas equal to the forecast unaccounted for gas percentage as stated above multipied by (a). In the case of a Dedicated Service where volume is measured from a custody transfer meter, the Unaccounted for Gas volume requirement is not applicable

3. a) Any volume of gas taken by the Applicant on a day at the Terminal Location which exceeds the sum of:
   i. any applicable Load Balancing Demand pursuant to Rate 310 ***and/or*** any applicable Storage Demand pursuant to Rate 315, plus

highlighted in revision marking mode at Exhibit H2, Tab 6, Schedule 1, pages 1 to 9. Changes to the Rate 125, 135, 310 and 315 are highlighted in bold and italic text and are found in the respective rate schedules at Exhibit H2, Tab 6, Schedule 1.

Rate Schedule Changes – Rates 125, 310 and 315

10. The Company is proposing to remove implicit load factor requirements for Rate 125 customers in recognition that most potential customers on this rate class are likely to be merchant power generators responding to electricity dispatch orders. These customers are unlikely to have much control over their load factors. On the other hand, distribution revenue under this rate is recovered solely through fixed charges, so the Company would recover its fixed distribution costs irrespective of the customer's take. Accordingly, the Company is proposing to remove the minimum annual volume requirement of 200 10^6m^3 under this rate. The minimum contract demand requirement of 600 10^3m^3 will be retained to maintain the cost and pricing characteristics of this rate. The annual minimum volume requirement has also been removed for the Rate 125 commissioning rate.

11. In addition, the Company is proposing to change the hourly demand requirement from 1/20 or 5% of delivered volume to 1/24 or 4.2% of contract demand. This change better reflects the size of the customers, and the fact that pipeline capacity is sized to meet the customer's needs on an hourly basis. The Company is also proposing to include the test year forecast unaccounted for gas percentage in the rate schedule for ease of reference.

12. The Company proposes to modify the eligibility requirements for Rate 310 and 315 to restrict availability to customers for whom it had determined that load balancing and storage capability is available. This clause is intended to protect existing rate payers from potential cost and quality of service consequences from addition of loads with unpredictable load balancing and storage needs. This clause recognizes

UNDERTAKING JT2.27

UNDERTAKING

TR 1, page 183

To confirm 4.2 percentage used in Exhibit I, D1, 1.14, page 3.

RESPONSE

The average vacancy rate from 2007 to 2011 is 4.1 percent. If the vacancy credit increases from 2.25% to 4.1%, at a high level estimate, O&M budget in 2013 would decrease roughly $2.1 million.

Witnesses: I. Chan
K. Culbert
A. Kacicnik
S. Kancharla
M. Suarez

UNDERTAKING JT2.28

UNDERTAKING

TR 1, page 196

To advise what 200 degree days would have impact on the revenue and revenue forecast.

RESPONSE

An increase in 200 degree days for the Central region, applying existing rates, would result in an $8.1 million increase in the distribution margin for residential customers.

Witnesses: I. Chan
K. Culbert
A. Kacicnik
S. Kancharla
M. Suarez

UNDERTAKING JT2.29

UNDERTAKING

TR 1, page 196

To check for and produce if possible CGA study of unaccounted for gas within the LAST five years

RESPONSE

Based upon information available from Internet sites, the Company's Canadian Gas Association ("CGA") membership information and paper records, as inquiries to the Director at CGA , there was no unaccounted for gas benchmarking study conducted by CGA within the last five years.

Witness: I. Chan

UNDERTAKING JT2.30

UNDERTAKING

TR 1, page 201

To provide a response to the following question: To the extent that the Enbridge 3-D seismic program determines there has been a migration of gas to the A1 structure, would Enbridge recognize that the gas that has migrated would have been lost and unaccounted for, and, therefore, funded by ratepayers and not the shareholder?

RESPONSE

No. If there has been migration to any A1 structure, only one component of the LUF provision would have been attributable to migration. The LUF provision for EGD storage was put in place in the 1990's while any A1 migration could have started at the beginning of the storage operations in 1964. The information and the process to reach any conclusions on this issue is not currently available and is not going to be available for at least one year.

Witnesses: I. Chan
K. Culbert
A. Kacicnik
S. Kancharla
J. Sanders
M. Suarez

UNDERTAKING JT2.31

UNDERTAKING

This Undertaking number was not used.

UNDERTAKING JT2.32

UNDERTAKING

TR 1, page 206

To calculate the impact on residential average use consumption and the resulting impact on the revenue requirement of having no gas price increase in 2013.

RESPONSE

Using the results of the updated models for Rate 1 average use consumption, an 18% reduction in the level of 2013 gas price (which effectively keeps 2012 and 2013 prices constant) increases average use for Rate 1 by 0.72%. The impact of this change results in an approximate $1.7 million decrease in revenue deficiency.

Witnesses: I. Chan
K. Culbert
A. Kacicnik
S. Kancharla
M. Suarez

UNDERTAKING JT2.34

UNDERTAKING

TR 1, page 209

To provide the regression statistics for the Niagara weather zone when the time variable is excluded.

RESPONSE

The results of the regression equation with the removal of the time variable from the original Niagara average use model are provided below. The exclusion of the time variable in the Niagara equation reduced the significance of the gas price variable in both long run and short run models and weakened the diagnostic test results. It is for these reasons that the Company chose to retain the time variable in the model used to determine Rate 1 Revenue Class 20 average use for the Niagara Weather Zone.

Witnesses: I. Chan
K. Culbert
A. Kacicnik
S. Kancharla
M. Suarez

Niagara Weather Zone without Time Variable

Long Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	2.40	4.72	0.00
LOG(NDD)	0.70	11.06	0.00
LOG(REALNRCRPG)	-0.03	-1.17	0.25
LOG(NRC20VINT)	0.83	10.69	0.00
DUM2008	-0.08	-4.71	0.00
R-squared	0.98		
Adjusted R-squared	0.97		
S.E. of regression	0.02		
F-statistic	221.41		0.00

Short Run Equation

Variable	Coefficient	t-Statistic	p-Value
C	-0.01	-2.93	0.01
DLOG(NDD)	0.72	21.17	0.00
DLOG(REALNRCRPG)	-0.04	-1.35	0.19
DUM2008	-0.02	-1.67	0.11
ECM_NRC20(-1)	-0.53	-3.31	0.00
R-squared	0.96		
Adjusted R-squared	0.95		
S.E. of regression	0.02		
F-statistic	125.10		0.00

Witnesses: I. Chan
K. Culbert
A. Kacicnik
S. Kancharla
M. Suarez

UNDERTAKING JT2-APPRO.1

UNDERTAKING

Please confirm that there is no field testing or field maintenance conducted on smaller general service rate meters.

RESPONSE

Not confirmed.

As stated in Exhibit D2, Tab 6, Schedule 1, paragraph 13, mass market customer meters are inspected in accordance with the Measurement Canada sampling standard. The Company has an annual program where meters are evaluated based on Measurement Canada's legislative requirements. Meter accuracy is monitored on a regular basis. If a meter's accuracy has deteriorated, the meter is replaced.

Witness: I. Chan

UNDERTAKING JT2-APPRO.2

UNDERTAKING

Please also confirm that general service rate meters are replaced once the sample tests of similar meters of the same vintage fail the accuracy tests.

RESPONSE

Confirmed. Meters are sampled and evaluated in accordance with Measurement Canada Regulations under current LMB-EG-04: Statistical Sampling Plans for the Verification and Reverification of Electricity and Gas Meters. All meters from the same manufacturer, model, and year are removed from service once the sample tests of similar meters of the same vintage fail the accuracy tests.

Witness: I. Chan

UNDERTAKING JT2-APPRO.3

UNDERTAKING

Please confirm that axial flow or turbine meters are used for measurement of large industrial contract loads, and further that these axial flow meters are tested for accuracy at least annually.

RESPONSE

Confirmed.

As stated in Exhibit D2, Tab 6, Schedule 1, all the large volume meter stations are inspected annually.

Witness: I. Chan

UNDERTAKING JT2-APPRO.4

UNDERTAKING

Please confirm that large gas generators generally operate at or above 50% of the daily contract demand level

RESPONSE

Not confirmed.

Four out of five large unbundled gas generators have been generally operating below 50% of the daily contract demand level.

Witnesses: I. Chan
A. Kacicnik

UNDERTAKING JT2-APPRO.5

UNDERTAKING

Please confirm that EGD corrects for temperature, pressure and supercompressibility for large Rate 125 customers taking high pressure gas?

RESPONSE

Confirmed.

In accordance with the Measurement Canada regulatory requirements, the Company utilizes the Measurement Canada approved NX-19 calculation to correct for supercompressibility for all meters that have pressure delivery greater than 100 psig.

In addition, the Company goes beyond Measurement Canada's required standard and utilizes the Measurement Canada approved NX-19 calculation to correct for supercompressibility for other meters that have pressure delivery greater than 20 psig in order to achieve greater levels of measurement accuracy for ratepayers cost effectively.

Witness: I. Chan

UNDERTAKING JT2-APPRO.6

UNDERTAKING

Does Enbridge correct for supercompressibility for other billing accounts or rate classes, if so please identify the nature of the accounts that have this correction factor applied.

RESPONSE

Please refer to the Undertaking response at Exhibit JT2-APPrO.5.

Witness: I. Chan

UNDERTAKING JT2-APPRO.7

UNDERTAKING

For gas losses resulting from third party damage to pipelines, please confirm that the vast majority of damages, where the damage results in gas venting to atmosphere, occurs on smaller lower pressure pipelines other than the X-HP mains?

RESPONSE

For gas losses resulting from third party damage to pipelines, EGD confirms that the vast majority of damages, where the damage results in gas venting to atmosphere, occurs on smaller lower pressure pipelines.

Witness: I. Chan

UNDERTAKING JT2-APPRO.8

UNDERTAKING

What is the leak survey frequency on typical distribution piping and the leak survey frequency X-HP mains?

RESPONSE

As the extra high pressure ("XHP") mains are vital mains, they are surveyed once annually (i.e., once per year). KOL lines (a type of vital main) are also surveyed yearly because they have many fittings. Distribution piping that is at a higher risk of leaking due to its age, e.g., copper services, bare steel, rooftop headers and cast iron, is surveyed annually at a minimum. Distribution piping that is located in areas that present a higher consequence if leaking, e.g., wall to wall areas is also surveyed yearly.

All other distribution mains and services, with the exception of post 1985 plastic services are surveyed on a five year frequency. Post 1985 plastic services are surveyed on a ten year frequency.

The Company's leak survey program is in accordance with the Canadian Standard Association's CSAZ662-07 standards. According to the standards, leakage survey frequencies shall be determined by considering such factors as the age and condition of the system, the population density, and the soil conditions, and shall be documented in the operating company's operating and maintenance procedures.

Please also see Exhibit D2, Tab 6, Schedule 1, paragraphs 23 to 25 for the other leak reduction initiatives that the Company has been undertaking continuously. The leak survey program mentioned above is just one of these initiatives.

Witnesses: I. Chan
A. Kacicnik

UNDERTAKING JT2-ENERGY PROBE 1

UNDERTAKING

Please provide the 2013 forecasts, as opposed to the equation specifications, for the western region central weather zone, the northern region central weather zone, and the Niagara weather zone, both with and without the time variable in the equations.

RESPONSE

Normalized 2013 Average Use Forecast (m^3)

	As Filed		Undertaking	
	With Time Trend	No Time Trend	With Time Trend	No Time Trend
Western region, Central Weather Zone		2,428	2,393	
Northern region, Central Weather Zone		2,518	2,491	
Niagara Weather Zone	2,128			2,113

Witnesses: M. Suarez
H. Sayyan