



Jay Shepherd

Professional Corporation
2300 Yonge Street
Suite 806, Box 2305
Toronto, ON M4P 1E4

BY EMAIL and RESS

May 21, 2013

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2012-0433/EB-2012-0451/EB-2013-0074 – Interrogatories

We are counsel to the School Energy Coalition (“SEC”). Enclosed please find the interrogatories on behalf SEC in the above-noted proceedings.

Yours very truly,
Jay Shepherd P.C.

Original signed by

Mark Rubenstein

cc: Applicant and Intervenors (by email)

T. (416) 483-3300 F. (416) 483-3305

mark.rubenstein@canadianenergylawyers.com
www.canadianenergylawyers.com

IN THE MATTER OF an application by Enbridge Gas Distribution Inc. for: an order or orders granting leave to construct a natural gas pipeline and ancillary facilities in the Town of Milton, City of Markham, Town of Richmond Hill, City of Brampton, City of Toronto, City of Vaughan and the Region of Halton, the Region of Peel and the Region of York; and an order or orders approving the methodology to establish a rate for transportation services for TransCanada Pipelines Limited;

AND IN THE MATTER OF an application by Union Gas Limited for: an Order or Orders for pre-approval of recovery of the cost consequences of all facilities associated with the development of the proposed Parkway West site; an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in the Town of Milton; an Order or Orders for pre-approval of recovery of the cost consequences of all facilities associated with the development of the proposed Brantford-Kirkwall/Parkway D Compressor Station project; an Order or Orders for pre-approval of the cost consequences of two long term short haul transportation contracts; and an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in the City of Cambridge and City of Hamilton.

INTERROGATORIES
ON BEHALF OF THE
SCHOOL ENERGY COALITION

[Note: All interrogatories have been assigned to issues. However, please provide answers that respond to each question in full, without being restricted by the issue or category. Many interrogatories have application to multiple issues, but all have been asked only once to avoid duplication.]

Interrogatories to Enbridge Gas Distribution – GTA Reinforcement (EB-2013-0451)

A1-SEC-1

Please detail the impacts on the proposed GTA Project of the Board rejecting Union's proposed Parkway West (EB-2012-0443) and/or Brantford-Kirkwall-Parkway D Project (EB-2013-0074).

A1-SEC-2

[Ex.A/4/1/p.8] Please provide details about each major gas supply outage that Enbridge has experienced in the Greater Toronto Area in the past 20 years.

A1-SEC-3

[Ex.A/3/1/p.12, Ex.E/1/2] With respect to Enbridge's and TransCanada's "continuing dialogue regarding the details of the shared use of the pipeline segment from Bram West Interconnect to Albion":

- a) What is the status of those discussions?
- b) When is it expected that the Transportation Service Agreement will be finalized and signed?
- c) Please detail the consequences on the proposed GTA Project if no Transportation Service Agreement is reached.
- d) Please detail the cost consequences to each rate class if no Transportation Service Agreement is ultimately entered into.
- e) Please provide any MOUs, letter of intent, or other documents, either binding or non-binding, between Enbridge and TransCanada that outline the proposed terms of the pipeline shared use.

D5-SEC-4

[Ex.E/1/2] Please provide the rate impacts on each customer class, for the shared used pipeline with TransCanada.

D5-SEC-5

[Ex.E/1/2] Please provide the incremental revenue requirement that would be allocated to TransCanada if the cost allocation methodology used in EB-2012-0354 were utilized.

Interrogatories to Union Gas -- Parkway West (EB-2012-0433)

A1-SEC-6

Please detail the impacts on the proposed Parkway West Project, of the Board rejecting Enbridge's proposed GTA project (EB-2012-0451) and/or Union's proposed Brantford-Kirkwall-Parkway D Project (EB-2013-0074).

A1-SEC-7

[RH-003-2011 TCPL Mainline Restructuring Decision] Please provide all impacts of the TransCanada National Energy Board Mainline Restructuring Decision on the assumptions that underlie the business case for the Parkway West project.

A1-SEC-8

Please provide the probability of failure of:

- a) the Dawn to Parkway System
- b) a single compressor at Parkway
- c) the Dawn to Parkway system with the addition of the proposed facilities

A1-SEC-9

Is Union aware of any industry or standards outlining the level of an acceptable pipeline and/or compressor failure? If so, please provide details.

A1-SEC-10

[p.65] Please provide a copy of the report and/or findings prepared by the third-party consultant engaged to perform a risk assessment of Parkway to identify likelihood of a failure to impacting delivered to the TransCanada Mainline.

A1-SEC-11

[p.71] Please provide a copy of the report and/or findings prepared by the third-party consultant engaged to perform a risk assessment of Parkway to identify likelihood of a failure to impacting delivered to the Enbridge.

A1-SEC-12

[EB-2011-0210, Decision p.126] Has Union engaged in a consultative process, the purpose of which to jointly consider the need for the Parkway West project, explore reasonable alternatives (including the repurposing of existing facilities) in order to maximize the benefit to Ontario ratepayers? If so please provide details and the results of the consultations.

A4-SEC-13

[p.86-96, Attachment 10-1] Please provide a cost estimate for each LCU alternative.

A3-SEC-14

[p.102-106] Please reconcile the estimated \$15.3m annual revenue requirement for the projects (paragraph 4) with the statement that in-franchise customers will bear 16% or \$3.4m of the costs directly attributable to the program (paragraph 17), which would indicate total annual revenue requiring of \$21.25m .

Interrogatories to Union Gas -- Brantford-Kirkwall-Parkway D Project (EB-2013-0074)**A1-SEC-15**

[Section 1, p.3] Please provide further details and the current status of the proposed TransCanada expansion of the Parkway to Maple corridor.

A1-SEC-16

[Section 1, p.3] Please detail the impacts on the proposed Brantford-Kirkwall-Parkway D Project, of the Board rejecting Enbridge's proposed GTA project (EB-2012-0451) and/or Union's proposed Parkway West Project (EB-2012-0433),

A1-SEC-17

[Section 6/p.6] When did Union complete modifications to Kirkwall to enable gas from Niagara and Chippewa to access Daw and Parkway.

A1-SEC-18

[RH-003-2011 TCPL Mainline Restructuring Decision] Please provide all impacts of the TransCanada National Energy Board Mainline Restructuring Decision on the assumptions that underlie the business case for the Brantford-Kirkwall-Parkway D Project.

A3-SEC-19

[Section 8, p.9] Please provide an update on discussions with TransCanada about a potential purchase of a used compressor.

A3-SEC-21

[Schedule 9-2, p.1] Please explain why there are no land costs associated with the Parkway D Station.

A3-SEC-22

[Schedule 9-3, p.2-3] Please explain why Gas Supply Cost Savings decrease from \$28,200/year in years 1-10 to \$1,755 in years 11-20.

Submitted by the School Energy Coalition on this 21st day of May, 2013

Original signed by

Mark Rubenstein
Counsel for the School
Energy Coalition