



450 – 1 Street S.W.
Calgary, Alberta T2P 5H1

Tel: (403) 920-2107
Fax: (403) 920-2308
Email: catharine_davis@transcanada.com

May 21, 2013

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

Filed electronically

Attention: Ms. Kirsten Walli
Board Secretary

Dear Ms. Walli:

Subject: Enbridge Gas Distribution Inc. (EGD) – Greater Toronto Area Project (GTA)
Union Gas Limited (Union) – Parkway West Project
Union – Brantford-Kirkwall/Parkway D Compressor Station Project
OEB File Nos: EB-2012-0451, EB-2012-0433, and EB-2013-0074
TransCanada PipeLines Limited (TCPL)
Interrogatories to Union Gas Limited

In accordance with the requirements in Procedural Order No. 2 dated May 8, 2013, please find attached TCPL's Interrogatories to Union Gas Limited (Union).

TCPL would also like to update its contact information to include Legal Counsel. Please add the following:

Mr. Gordon Cameron
Telephone: (613) 788-2222
Facsimile: (613) 788-2247
E-mail: gord.cameron@blakes.com

Mailing Address:
Blake, Cassels & Graydon LLP
World Exchange Plaza
20th Floor, 45 O'Connor Street
Ottawa, Ontario K1P 1A4

Sincerely,
TransCanada PipeLines Limited

Original Signed by Joel Forrest on behalf of

Catharine Davis
Vice President
Pipelines Law

ONTARIO ENERGY BOARD
EB-2012-0451, EB-2012-0433, and EB-2013-0074

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. C. 15, Schedule B;

AND 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.

To: Ms. Kirsten Walli
Board Secretary
Ontario Energy Board

TRANSCANADA PIPELINES LIMITED
INTERROGATORIES TO UNION GAS LIMITED

A.1 - TCPL 1:

Reference:

- a) EB-2013-0074, Application Schedule 6-1; and
- b) EB-2012-0433, Application, Schedule 6-1.

Preamble:

Schedule 6-1 of EB-2012-0433 shows Union's Dawn-Parkway M12 contracts, and Schedule 6-1 of EB-2013-0074 shows Union's Dawn-Kirkwall M12 and C1 contracts.

Request:

- a) Please provide all M12, M12-X and C1 contracts on the Dawn-Parkway system that have a term of 1 year or longer in pdf and excel format showing the same columns as the referenced documents.
- b) Please sort the contracts by expiry date and by customer.

A.1 - TCPL 2:

Reference:

- a) EB-2012-0433, Application Schedule 6-1.

Preamble:

Schedule 6-1 of EB-2012-0433 shows a Dawn-Parkway M12 contract held by Greenfield South Power Corporation for 46,950 GJd with an expiry date of October 31, 2032. It is our understanding that this capacity is associated with the power plant that was moved from Mississauga to the Sarnia/Lambton area.

Request:

- a) Please comment on the current status of this contract and whether it is included in the Dawn-Parkway capacity requirements in this application.

A.1 - TCPL 3:

Reference:

- a) EB-2013-0074, Section 7, Page 1

Preamble:

Union states: “Demand for transportation on the Dawn-Parkway System continues to grow. Customers interested in contracting on the Dawn-Parkway System are generally driven by: ...

- 3) growing demand in central, eastern and northern Ontario as well as Québec and the U.S. Northeast.”

Request:

- a) Please provide the studies and analysis supporting this statement.

A.1 - TCPL 4:

Reference:

- a) EB-2013-0074, Application Section 7, Page 8, and Schedule 8-2.

Preamble:

- a) Union states: “The National Fuel Gas turnback is conditional upon National Fuel Gas management approval.”
- b) TransCanada also wishes to better understand the effect the Dawn to Kirkwall turnback quantity has on the applied for facilities

Request:

- a) Please confirm whether National Fuel Gas has received management approval to turn back its capacity.
- b) Is the National Fuel Gas capacity turnback now final?
- c) Assuming that the Dawn to Kirkwall turnback quantity (26,695 GJ/d) is not turned back please describe the impact on the proposed facilities and the impact to the shortfall in capacity.
- d) Please provide a winter design day 2015/16 schematic similar to the one in Schedule 8-2 assuming that the Dawn to Kirkwall quantity is not turned back.

A.1 - TCPL 5:

Reference:

- a) EB-2013-0074, Application Section 7, Page 9.

Preamble:

At lines 9 and 10 Union states: “Union now has binding transportation agreements with Enbridge, Gaz Métro and Vermont Gas subject to conditions precedent.”

Request:

- a) Please provide the “conditions precedent” for each of the contracts mentioned above.

A.3 - TCPL 6:

Reference:

- a) EB-2013-0074, Application Section 5 and Section 10.

Preamble:

Union discusses the net benefits to various groups of customers (Union North, Union South, EGD, GMi) in Section 5 and discusses the rate impacts on Rate M12 customers in Section 10.

Request:

- a) Please provide a table showing the net annual benefits or net annual costs to the following groups of customers resulting from the construction of the requested facilities in EB-2012-0433 and EB-2013-0074 and associated contractual changes:
 - (i) Union North
 - (ii) Union South
 - (iii) EGD
 - (iv) GMi
 - (v) All other M12 shippers individually.

A.1 - TCPL 7:

Reference:

- a) EB-2013-0074, Application, Schedule 8-2.

Preamble:

The Design Day Demand Table in the reference lists 81,571 GJ/d for Kirkwall-Dominion, 59,699 GJ/d for Hamilton #3 and 137,951 GJ/d for Burlington/Bronte.

TransCanada wishes to understand some of the delivery quantities to TransCanada at Kirkwall and Parkway.

Request:

- a) What, if any, of these demands are transported on the TransCanada System for delivery to the TransCanada Nanticoke, Hamilton Gate, Burlington or Bronte Meter Stations.
- b) If the answer to a) above is greater than zero, what contracts does Union have with TransCanada for delivery of those design day demands.

A.1 - TCPL 8:

Reference:

- a) EB-2013-0074, Application Section 8, Page 2 of 10, Lines 18 and 19; and
- b) EB-2013-0074, Application Schedule 8-2.

Preamble:

TransCanada wishes to understand the capability of the Dawn to Parkway System on winter days when all units are available including units designated as required for loss of critical unit conditions.

Request:

- a) Please provide a schematic similar to the schematic in Schedule 8-2 with all the same assumptions except that instead of assuming a critical compressor outage has occurred on the system assume that all units are available. That is to say that all three units at Lobo C/S and all four units at Parkway, including units C and D at Parkway West are available. Also, do not constrain the capacity of the Dawn to Parkway System based on any upstream or downstream constraints.

A.1 - TCPL 9:

Reference: EB-2013-0074, Application Section 10. pg. 6.

Preamble:

Union states: “Based on the current Board-approved allocation of Dawn-Parkway costs, adjusted to include the increase in Union North demands of approximately 70,000 GJ/d and M12 demands of 363,000 GJ/d associated with the Project (for a total of 433,000 GJ/d), in-franchise rate classes are allocated approximately 16% of

the costs directly attributable to the Project. The remaining 84% of costs directly attributable to the Project are allocated to ex-franchise rate classes.”

Request:

- a) Please explain the difference in M12 volumes of 433,000 GJd mentioned above and the M12 volumes shown in Figure 7-4 of 736,000 GJd and the 48,695 GJd of capacity turnback shown in Figure 7-3. If the difference is future capacity turnback please provide turnback volumes by delivery point and by year.