



## Jay Shepherd

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### BY EMAIL and RESS

July 11, 2013

Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto, Ontario  
M4P 1E4

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

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

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

Yours very truly,  
**Jay Shepherd P.C.**

*Original signed by*

Mark Rubenstein

cc: TransCanada, Applicants and Intervenors (by email)

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**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 TO TRANSCANADA PIPELINES LIMITED**

### **ON BEHALF OF THE**

### **SCHOOL ENERGY COALITION**

1. [p.5] TransCanada states that as a result of the RH-003-2011 Decision, “TransCanada requires greater assurances than it has had in the past that it will recover its investment in any new facilities and its existing rate base from customers”. What type of additional assurances does TransCanada now require that it did not require before the RH-003-2011 Decision?
2. [p.6] With respect to TransCanada’s intention to apply “to the NEB by the end of the 2013 to construct the interconnections required to accommodate Segment A of Enbridge’s GTA Project and the facilities associated with TransCanada’s King’s North Project.”
  - a) What has changed since the TransCanada’s Board of Directors’ cancelled the Eastern Mainline Expansion Project?
  - b) What assurances can TransCanada provide that it will file for NEB approval of the facilities?
  - c) When would the expected in-service date be for these facilities?

3. Please provide a copy of the reply to Enbridge's July 5<sup>th</sup>, 2013 letter to TransCanada that was referenced by its counsel during the hearing on July 11<sup>th</sup>, 2013 (Transcript page 20).
4. Please provide TransCanada's position on the status on the Memorandum of Understanding between itself and Enbridge. Please detail all legal and and/or commercial steps TransCanada is taking as a result of Enbridge's letter of July 10, 2013.

Submitted by the School Energy Coalition on this 11<sup>th</sup> day of July, 2013.

*Original signed by*

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Mark Rubenstein  
Counsel for the School  
Energy Coalition