

July 12th, 2013

By RESS and Courier

Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, Ontario
M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

RE: EB-2012-0451 – Greater Toronto Area (“GTA”) LTC Project
EB-2012-0433 – Parkway West Project
EB-2013-0074 – Brantford – Kirkwall/Parkway D Project

Dear Ms. Walli,

Please find attached Interrogatories on behalf of Union Gas Limited on the evidence filed by TransCanada Pipelines Limited.

If you have any questions with respect to this submission please contact me at (519) 436-5473.

Yours truly,

[original signed by]

Karen Hockin
Manager, Regulatory Initiatives

cc: Crawford Smith, Torys
All Intervenors

UNION GAS LIMITED
INTERROGATORIES ON TRANSCANADA PIPELINES LIMITED ("TCPL") WRITTEN EVIDENCE

1. *Reference:* Section 2.0, Lines 37-38, page 1 of 6 and Lines 1-2, page 2 of 6:
 - a) Please provide a copy of the 2010 open season package.
 - b) What contracts resulted from the 2010 open season? Please include Shipper, Quantity, Receipt Point(s), Delivery Point(s), Term and Commencement Date.
 - c) What facilities were constructed or are being constructed to serve the contracts from the 2010 open season? Please include the in-service date proposed in the open season and the actual or planned in-service date.
 - d) If facilities were placed into physical service later than originally planned, what were the reasons for the delay?
2. *Reference:* Section 3.0, Lines 4-12, Page 2 of 6:
 - a) Please provide a copy of the TCPL 2012 Firm Transportation New Capacity Open Season package which ran from March 30 to May 4, 2012.
 - b) What contracts resulted from this 2012 open season? Please include Shipper, Quantity, Receipt Point(s), Delivery Point(s), Term and Commencement Date.
 - c) What facilities were planned to be constructed to serve the contracts from the 2012 open season?
 - d) Please confirm that TransCanada now does not plan to place these facilities into service under the terms of the 2012 open season.
3. *Reference:* Section 3.0
 - a) Did TransCanada conduct any additional open seasons for firm, long-term, short haul transportation between the 2010 open season and the 2012 open season?
 - b) If not, why not?
4. *Reference:* Section 3.0, Lines 13-19, Page 2 of 6
 - a) Please confirm that in September 2012, TransCanada provided notice to shippers that entered the 2012 open season that service would no longer be available in 2014 and

was delayed to November 2015. Were there other shippers in addition to Union and Gaz Métro that were awarded capacity?

- b) When did Enbridge inform TransCanada that the in-service date for Segment A of the proposed GTA Project would be delayed until 2015? Please provide copies of any written correspondence to that effect.
- c) Please provide a copy of all internal presentations, correspondence including emails, Board of Director directives and any materials provided to the Board of Directors in connection with the suspension of the project and cancellation of the associated Precedent Agreements as per TCPL's letters of April 29, 2013.

5. *Reference:* Section 5.0, lines 30-34, page 5 of 6

- a) TCPL notes that one consequence of the RH-003-2011 Decision was a choice not to build to meet the service requests of Gaz Métro or Union. Are there any other consequences or decisions TCPL has undertaken as a result of the Decision? Please describe. Please provide all presentations and correspondence (including emails) related to these consequence and decisions.

6. *Reference:* Section 5.0, lines 1-3, page 6 of 6

- a) Please provide a copy of the recently posted new capacity open season.
- b) Please provide details and results of any other Firm Transportation open seasons conducted since April 29 2013 (including for short notice and non-renewable service).
- c) Please file copies of any letters of complaint that the NEB has received in regard to TCPL since the Compliance Toll appeal in May 2013.
- d) Please file any NEB correspondence in response to any complaint letters.
- e) Please file any responses to the NEB submitted at the time of filing this interrogatory response.

- f) Please confirm that the following table comparing the tolls for services offered in the recently posted new capacity open season to the tolls approved under RH-003-2011 is correct. If not, please provide a new table.

Receipt Point	Delivery Point	Compliance Tolls (RH-3-2011) (GJ/d)	2015/2016 NCOS Tolls (GJ/d)	Price Difference (GJ/d)	Increase
Empress	Union EDA	\$1.65	\$1.65	Nil	0%
Empress	GMi EDA	\$1.73	\$1.73	Nil	0%
Empress	Enbridge EDA	\$1.62	\$1.62	Nil	0%
Empress	East Hereford	\$1.83	\$1.40	-\$0.43	-24%
Parkway	Union EDA	\$0.25	\$1.65	\$1.40	560%
Parkway	GMi EDA	\$0.41	\$1.73	\$1.32	322%
Parkway	Enbridge EDA	\$0.32	\$1.62	\$1.30	406%
Parkway	East Hereford	\$0.51	\$1.40	\$0.89	175%
Niagara	Union EDA	\$0.32	\$1.75	\$1.43	447%
Niagara	GMi EDA	\$0.48	\$1.83	\$1.35	281%
Niagara	Enbridge EDA	\$0.39	\$1.72	\$1.33	341%
Niagara	East Hereford	\$0.58	\$1.50	\$0.92	159%
Chippawa	Union EDA	\$0.32	\$1.75	\$1.43	447%
Chippawa	GMi EDA	\$0.48	\$1.83	\$1.35	281%
Chippawa	Enbridge EDA	\$0.39	\$1.72	\$1.33	341%
Chippawa	East Hereford	\$0.58	\$1.50	\$0.92	159%

7. *Reference:* Section 6.0, lines 15-26, page 6 of 6

- a) TCPL states a \$150 million shortfall may be a potential consequence to Ontario gas users. How is this figure derived? Please show the rate impact by service type and path for all TCPL services and the point in time this would be effective. Please provide all calculations.
- b) Prior to the NEB decision in RH-003-2011, how would the quoted number of \$150 million been dealt with? After the fixed tolls period, how will the issue be dealt with?
- c) Has TCPL considered in the above calculation, the significant gas cost savings to customers in Ontario and Quebec that result from the proposed facilities.

8. *Reference:* Section 6.0, page 6, lines 16-21

Preamble: TCPL contends that de-contracting TCPL long-haul by Union and Gaz Métro will increase TCPL tolls. Union seeks to understand if TCPL or any of its affiliates are actively competing with their own long-haul capacity.

- a) Has or is TCPL, or any of its affiliates, marketing US-based supplies and short haul transportation options to Eastern Ontario shippers that would compete with Empress-based TCPL long haul capacity?

9. *Reference:* Section 4.0, Page 3 of 6, Lines 20-22:

Preamble : “TransCanada intended to utilize its share of capacity on the new Segment A and new TransCanada facilities from Albion to west of Maple (TransCanada’s King’s North project) to satisfy the capacity requirements in the precedent agreements with Union and Gaz Métro.”

- a) Please provide 2015/2016 operating year versions of the peak design day flow schematic provided in TCPL’s 2012 Eastern Mainline Expansion Section 58 application, Appendix 3-4, page 1, showing the operation of the eastern triangle (i) before and (ii) after the King’s North and GTA projects are constructed.

10. *Reference:* Section 4.0, Page 4 of 6, Lines 18-19:

Preamble: “Under design day conditions, TransCanada will be utilizing its full allotment of the capacity (50%) to meet its contractual obligations.”

- a) If TCPL fully utilized compression in the Eastern Triangle, and assuming unrestricted demand at TQM, how much gas could be transported from Parkway to Maple and along the Eastern Triangle system to the various delivery areas. Please update the two schematics provided in the previous question assuming; (i) current facilities as well as (ii) with the TCPL Kings North and the GTA projects in service.
- b) What is the capacity of the Eastern Triangle to the various delivery areas under TCPL’s 2015/2016 design day conditions?

11. *Reference:* Section 5.0, page 6, lines 4-6

Preamble: TCPL states they intend to apply to the NEB for approval to construct the King’s North Project.

- a) What is the status of the Environmental Assessment for the King’s North project? When does TCPL expect the Environmental Report to be finalized? If the report is

already finalized please provide a copy of the report.

b) Please provide a map showing the proposed route of the King's North pipeline.

12. *Reference:* Section 5.0, page 6, lines 4-6

Preamble: TCPL states they intend to apply to the NEB for approval to construct the King's North Project.

- a) What is the proposed diameter of the King's North Pipeline?
- b) What is the proposed capacity of the King's North Pipeline and what is the impact on the design day flows on the Eastern Triangle?
- c) What is the MOP of the King's North pipeline?
- d) Is TCPL proposing any compression facilities along the route of the King's North pipeline?
- e) If no compression is proposed, how can TCPL ensure that gas from the King's North pipeline can be received into the Parkway to Maple system?
- f) What contracts on TCPL will support the King's North project? How were these contracts secured (i.e through an open season or other) and when? Who are the shippers?
- g) How are revenues generated to support the project calculated?
- h) What is the targeted in-service date for the project?

13. *Reference:* Section 3.0, page 2, line 6

Preamble: TCPL states Union and Enbridge proposed their "Parkway Extension" project to bypass the TransCanada Mainline.

- a) Please confirm that where a transmitter is unwilling or unable to provide capacity requested by the market, it does not represent a bypass for a customer to build on the same or similar path when there is no other transportation option.

14. *Reference:* Section 3.0, page 2, line 12

Preamble: TCPL states Union and Gaz Métro bid successfully into TransCanada's open season.

- a) Please describe what the term “successful” means, having regard to the subsequent delay and then cancellation of the project.

15. *Reference:* Section 5.0, page 5, line 7

Preamble: The TSA relies on a forecast of throughput on the Mainline for the Fixed Tolls Period.

- a) Please confirm that TCPL filed an updated forecast in their 2012-2013 Mainline Tolls Application (RH-003-2011) in June 2012.
- b) Please provide a copy of the forecast as filed.
- c) How often does TCPL update this forecast? Please provide a copy of TCPL’s most recent forecast.
- d) Please provide all internal presentations and correspondence including emails that deal with TCPL’s throughput forecast since June 2012.
- e) Please confirm that volumes awarded in the TCPL 2012 Firm Transportation New Capacity Open Season are not included in the 2012 forecast. If not, why not?