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August 20, 2013

VIA COURIER, EMAIL and RESS

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

Re: Enbridge Gas Distribution Inc. ("Enbridge") EB-2012-0451 - Greater Toronto Area ("GTA") LTC Project Interrogatories of TransCanada PipeLines Ltd. Evidence Update

Further to the Ontario Energy Board's ("Board") Procedural Order No. 7 dated July 29, 2013, enclosed please find Enbridge's interrogatories to TransCanada PipeLines Ltd. of their evidence update.

This submission is being filed through the Board's Regulatory Electronic Submission System.

Please contact me if you have any questions.

Yours truly,

[Original Signed]

Shari Lynn Spratt Supervisor Regulatory Proceedings

Encl.

cc: EB-2012-0451, EB-2012-0433, and EB-2013-0074 Interested Parties

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Enbridge Gas Distribution Inc. Interrogatories for TransCanada - Evidence Update

1. Reference

TransCanada Supplemental Evidence, Page 5

Preamble

TransCanada states that Enbridge's capacity calculations are the same as TransCanada for a NPS 36 and NPS 42. TransCanada then states: "However these calculations (i.e. both those of TransCanada and of Enbridge) are based on the requirements of TransCanada's integrated system. These requirements include a pressure at Parkway of 6000 kPa (870 psi) to account for area transient effects, and a pressure requirement of 4800 to 5000 kPa (700-725 psi) at Albion. Neither of these requirements would apply for a Segment A that is being used exclusively for Enbridge's distribution needs."

Request

- a) Please provide the assumptions underlying the calculations in Table 4.1.
- b) Using the same assumptions, please provide the flows for the two additional scenarios shown in the table below:

Inlet Pressure	6450 kPa	6000 kPa	3654 kPa
	(935 psi)	(870 psi)	(530 psi)
Outlet Pressure	3344 kPa	3999 kPa	3344 kPa
	(485 psi)	(580 psi)	(485 psi)
NPS 24	950 TJ/d		
NPS 30	1725 TJ/d		
NPS 36	2780 TJ/d		
NPS 42	4100 TJ/d		

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2. Preamble

Enbridge wishes to better understand the current and future operating capability of the Mainline.

<u>Request</u>

a) Please fill in the following table based on current capability:

Current Capability	Total Capacity	Total Capacity
	With Loss of	Without Loss of
	Critical Unit (TJ/d)	Critical Unit (TJ/d)
Prairies		
Northern Ontario Line		
Eastern Ontario Triangle		
Parkway to Maple Line		
Barrie Line		
Montreal Line		
North Bay Shortcut		

b) Please fill in the following table assuming that all lines are in-service and fully operational (i.e. all lines operating at MAOP):

Current Capability Assuming	Total Capacity	Total Capacity
Line 1 and Line 2 are Fully	With Loss of	Without Loss of
Operational	Critical Unit (TJ/d)	Critical Unit (TJ/d)
Prairies		
Northern Ontario Line		
Eastern Ontario Triangle		
Parkway to Maple Line		
Barrie Line		
Montreal Line		
North Bay Shortcut		

c) Please fill in the following table assuming current capability and that the Energy East Pipeline Project is approved and placed into service:

Capability With Energy East	Total Capacity	Total Capacity
Pipeline Project in Service,	With Loss of	Without Loss of
Line 1 and Line 2 at Current	Critical Unit (TJ/d)	Critical Unit (TJ/d)
Capability		
Prairies		
Northern Ontario Line		
Eastern Ontario Triangle		
Parkway to Maple Line		
Barrie Line		
Montreal Line		
North Bay Shortcut		

 d) Please fill in the following table assuming that all lines are in-service and fully operational (i.e. all lines operating at MAOP) and that the Energy East Pipeline Project is approved and placed into service:

Capability With Energy East	Total Capacity	Total Capacity
Pipeline Project in Service,	With Loss of	Without Loss of
Line 1 and Line 2 are Fully	Critical Unit (TJ/d)	Critical Unit (TJ/d)
Operational		
Prairies		
Northern Ontario Line		
Eastern Ontario Triangle		
Parkway to Maple Line		
Barrie Line		
Montreal Line		
North Bay Shortcut		

3. <u>Reference</u>

TransCanada Supplemental Evidence, Pages 9-10

Preamble

TransCanada asserts that 83% of 2015 gas supply contracts will rely on the Dawn to Parkway system and that Enbridge has risked a further reduction in supply diversity by purporting to cancel the MOU.

<u>Request</u>

- a) Please provide the size, maximum operating pressure, and age of each of the three pipelines (Line 1, Line 2, and Line 3) that comprise the Northern Ontario segment of the TransCanada Mainline?
- b) Please confirm which of the three lines described in Part (a) will be removed from service as part of the proposed Energy East oil conversion?
- c) Please provide an engineering diagram for the Northern Ontario segment of the TransCanada Mainline which shows, *inter alia:*
 - i. Those sections of Line 1, Line 2 and Line 3 which have been de-rated or for which TransCanada plans to de-rate;
 - ii. Those sections of Line 1, Line 2 and Line 3 which have been shut in and no longer flow gas.

4. <u>Reference</u>

TransCanada supplemental evidence, page 7.

Preamble

Enbridge wishes to understand TransCanada's forecast on the NIT-Dawn price differential.

<u>Request</u>

- a) Please provide TransCanada's forecast of the NIT-Dawn price differential each year from 2013-2025.
- b) Please provide any reports that TransCanada is relying upon for its NIT-Dawn price differential forecast.
- c) To the extent that TransCanada believes that the current price differential will continue, please explain the assumptions that support this belief.

5. <u>Reference</u>

TransCanada Supplemental Evidence, Pages 10-11

Preamble 199

TransCanada states that based on WCSB Remaining Technical Resource Estimates, there are ample supplies in the WCSB to satisfy eastern LDC markets for many decades to come.

<u>Request</u>

- a) For both the WCSB Conventional Supply forecast shown in Figure 7-3 and the WCSB Unconventional Supply forecast shown in Figure 7-4, for each year from 2013-2025 please provide the following:
 - i. TransCanada's estimate of the minimum NIT price that underpins each forecast, and;
 - ii. TransCanada's tolling assumptions that underpin each forecast, and;
 - iii. TransCanada's NIT-Dawn price differential assumption that underpins each forecast.
- b) Please provide the numerical data underlying Figures 7-3, 7-4 and 7-5 in table format.
- c) Please provide a list of all projects that TransCanada is currently involved in which would allow for increased flows of gas from the WCSB to the United States or the West Coast of Canada.

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d) For each of the projects listed above please provide the transportation capacity of each project along with, if applicable, the capacity that each project could be expanded to.

6. Preamble

Enbridge wishes to better understand TransCanada's intentions related to shipper contracting.

<u>Request</u>

a) If shippers were to sign contracts with TransCanada such that long haul contracts were to increase to a point where the Prairies and Northern Ontario segments of the Mainline were fully contracted based on current Mainline capabilities would TransCanada proceed with the Energy East Pipeline Project?

7. Preamble

Enbridge wishes to better understand TransCanada's pricing of discretionary services.

Request

- a) Please provide copies of all of TransCanada's open seasons for STFT since July
 1, 2013. Please include the open season notices along with the minimum bid
 floors for STFT in each open season.
- b) Please provide a table, or tables, showing TransCanada's minimum bid floors for IT service by path since July 1, 2013
- c) Please provide the forecast of discretionary revenue, broken out by path and discretionary service type, which underpins TransCanada's Compliance filing tolls.

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 d) Please provide the forecast of the discretionary revenue service premium, broken out by path and discretionary service type, which underpins TransCanada's Compliance filing tolls.

8. Preamble

Enbridge wishes to better understand current contracting on the Mainline.

Request

- a) Please provide a table showing the total STFT contract demand for the Mainline, by month, for the period January 2011 to March 2014. Please break out the table by long haul and short haul.
- b) Please provide a table showing the total FT contract demand for the Mainline, excluding STFT, by month for the period January 2011 to March 2014. Please break out the table by long haul and short haul.
- c) Please provide a table showing the total IT contract demand for the Mainline, by month, for the period January 2011 to August 2013 (to date). Please break out the table by long haul and short haul.

9. Reference

TransCanada Supplemental Evidence, Page 8

Preamble

TransCanada claims the LDC calculated savings have a net impact that is negative.

Request

 a) For the Net Impact calculated in Table 4.5, please provide the details of the calculation, including all assumptions, and including assumptions regarding the type and utilization of transport contracts. Please describe whether the Net Filed: 2013-08-20 EB-2012-0451/EB-2012-0433/EB-2013-0074 Page 8 of 8

Impact is based on TransCanada's understanding of the LDC's current contracting practices.

10. Reference

TransCanada Supplemental Evidence, Page 10

Preamble

TransCanada discusses supply diversity and states, "By connecting to the Mainline at Bram West, Enbridge would be able to access gas supplies delivered from the north through the Mainline in the event of an incident on Union's Dawn to Parkway system. Connecting the GTA project as now proposed by Enbridge in the Amended Application eliminates this supply option, and leaves Enbridge distribution customers with an increased level of exposure to an incident on Union's Dawn to Parkway system."

Request

a) Please describe the limitation that would prevent supplies to be delivered from the north through the Mainline to Parkway/Parkway West under the assumption there is an incident on Union's Dawn to Parkway System and Segment A is connected at Parkway West. For the purpose of this response, assume it would be possible to deliver gas to Bram West providing that Segment A is connected to Bram West, as stated in the above reference. If there are specific physical limitations on the Mainline system that would prevent gas from flowing to Parkway or Parkway West from the north, please describe them and roughly estimate the cost to eliminate these restrictions.