

EB-2012-0451
EB-2012-0433
EB-2013-0074

ONTARIO ENERGY BOARD

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.

Energy Probe Research Foundation

Interrogatories on the Supplementary Evidence Filed by

TransCanada Pipelines Limited

August 20, 2013

Energy Probe Interrogatories on the Supplementary Evidence

(August 16, 2013)

TransCanada Pipelines Limited

Note IR numbering continues from EP July IRs

Energy Probe IR TCPL #4

Ref: TCPL Supplementary Evidence (August 16, 2013) Page 2, line 21 and following

Preamble: It is TransCanada's intent today and always has been to use its capacity on Segment A on an open access basis to serve customers wishing to move gas on the Mainline.

Please indicate whether TCPL will/will not contract for capacity on the revised Segment A and if so under what conditions.

Energy Probe IR TCPL #5

Ref: TCPL Supplementary Evidence (August 16, 2013) Page 2, lines 35-37 and following

Preamble: TransCanada's original evidence in this proceeding was premised on the February 12th version of Enbridge's GTA Project. The parts of that evidence that are not premised on the MOU remain valid; this supplementary evidence addresses the further Amended Application.

Please indicate in summary form, which parts of TCPLs July 5, 2013 evidence do not remain valid.

Energy Probe IR TCPL #6

Ref: TCPL Supplementary Evidence (August 16, 2013) Page 2, line 35-37 and following

Preamble: The premise of the Amended (EGD) Application and of the Union compression and looping applications being considered in these proceedings is that there will be available capacity on Segment A above the Enbridge distribution requirements and an interconnection between whatever pipeline takes gas from Albion, to the Mainline near Vaughan. That premise is the subject of a contested proceeding before the National Energy Board.

a) Please provide extract(s) of the main relief requested in the cited NEB applications.

- b) Please indicate in some detail, why TCPL is indicating there will not be available capacity on the revised Segment A and also indicate what, if any, other regulatory approvals are required.
- c) Has TCPL filed an application to transport gas from Albion to Maple in competition with the Union/GMi proposal? Summarize the main parameters of this Application (Capacity, Cost and In-service date, etc.).

Energy Probe IR TCPL #7

Ref: TransCanada Supplementary Evidence Page 4, line 18-21 (August 16, 2013)

Preamble: If the projects proceed, TransCanada's revenues will decline by approximately \$455 million per year, based only on the first phase of the proposed Union / Gaz Métro bypass. The replacement revenue from short-haul service would be approximately \$55 million per year. Thus the net revenue reduction experienced by TransCanada would be approximately \$400 million per year.

- a) Please confirm/provide data and assumptions for the Mainline de-contracting that TCPL asserts could occur prior to the end of 2017 for
 - i. EGD. Union and GMi
 - ii. Indicate FT/ STFT contract termination/non-renewal assumptions and capacity and toll revenue impacts for each LDC
 - iii. Directly as a result of the short-haul by-pass for each of the two projects, EGD Segment A and Union/GMi Albion to Maple
- b) Relate the response and data used to TCPL's \$455 m cited above, to the 767,000 GJ/d in section 5 and projected (\$960) 2017 Toll Stabilization Account (TSA) total and how much of the latter could be allocated to each of the Eastern LDCs

Energy Probe IR TCPL #8

Ref: TransCanada Supplementary Evidence (August 16, 2013) Page 5, lines 2-5 and following

Preamble: If Enbridge does not rely on the MOU to justify the sizing of Segment A, then its only known need is for the reinforcement of Enbridge's distribution system, and the appropriate size of Segment A is NPS 24.

- a) Confirm that EGD has held an open season for capacity on the revised Segment A.
- b) Confirm that TCPL has not bid into this OS and if this is not the case, the capacity and dates requested.

- c) **Is TCPL contesting the use of Segment A as a Transmission pipeline under the (NEB) Guidelines? If so, please explain in some detail.**
- d) **How do the Guidelines fit/reconcile with the OEB STAR guidelines? Please discuss.**
- e) **Further to Energy Probe IR #3 related to JT 2.37, please confirm whether TCPL will provide the upstream capacity feeding into EGD GTA Project and if so on what pathways, capacity and under what conditions.**

Energy Probe IR TCPL #9

Ref: TransCanada Supplementary Evidence (August 16, 2013) Page 5, lines 16-18 and following

Preamble: TransCanada has previously determined that in the context of the configuration contemplated in the MOU, that the capacities of Segment A with NPS 36 and NPS 42 pipe are 1600 TJ/d and 2000 TJ/d respectively.

- a) **If shippers use Segment A for transportation from Parkway to Albion (assuming an onward connection to Maple) indicate TCPLs assessment of the sizing of Segment A for the following capacities:**

**357TJ/d
400TJ/d
800TJ/d**

- b) **Please state all assumptions used for the analyses.**
- c) **Reconcile answers to TCPL's Tables 4.1 and 4.2.**

Energy Probe IR TCPL #10

Ref: TransCanada Supplementary Evidence (August 16, 2013) Page 9 lines 29-31 and following and Table 6.1

Preamble: TransCanada submits that, especially from an LDC perspective, transportation path diversity is as important as supply diversity, because the latter goes to economic opportunities whereas the former goes to both economic opportunities and security of supply.

- a) **Confirm that as Footnote 9 indicates, EGD has requested 200TJ/d from Niagara on the Hamilton line.**

- b) **Is more capacity available on this pathway and could EGD increase its diversity further.**
- c) **Indicate any assumptions regarding incremental capacity on Niagara-Hamilton.**
- d) **Indicate TCPLs views regarding availability of STFT and STS beyond 2015 and project this Table 6.1 to 2017/18**

Energy Probe IR TCPL #11

Ref: TransCanada Supplementary Evidence (August 16, 2013) Page 15, Chart 7.5

- a) **Please provide a chart that shows for 2017 the WCSB conventional and unconventional Production from Western Canada.**
- b) **Please provide a projection/discussion of how this expanded/new production (2017) will impact the TSA and projected \$905m loss to be disposed of.**
- c) **Please provide relevant major assumptions and support for estimates.**

Energy Probe IR TCPL #12

Ref: TransCanada Supplementary Evidence (August 16, 2013) Page 17, lines 17-19

Preamble: For these reasons, TransCanada opposes the Amended Application and submits that it is not in the best interest of the nation, Ontario, or Ontario's consumers.

- a) **What does TCPL want the Board to do with the three specific Applications? In the response, please be specific to each application.**
- b) **What solutions does TCPL propose to meet EGD and Union/GMi's future transportation needs?**
- c) **Include a list of options TCPL considers viable and in the public interest.**
- d) **Confirm whether TCPL will/will not oppose the current leave to construct applications before the NEB whether or not the OEB approves these.**
- e) **Confirm TCPL will oppose a Union/GMi application for a transmission pipeline from Albion to Maple.**
- f) **In each of the circumstances/scenarios discussed in the responses to the questions, please provide a summary of reasons for TCPL's position(s), including the impact on its revenues and its exposure to the TSA.**