

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO
BOARD STAFF INTERROGATORY #5

INTERROGATORY

Issue: A.5

Is the proposed timing of the various components of the projects appropriate?

REF: Exhibit A, Tab 2, Schedule 4, Page 5 of 9

Preamble

Enbridge notes that update No. 6 was filed to amend the application as a result of the termination of the Memorandum of Understanding ("MOU") with TransCanada. In TransCanada's letter dated July 24, 2013 it stated that it considers the MOU to be a valid and binding contract.

Questions

- a) What impact, if any, does Enbridge anticipate TransCanada's position that the MOU remains a binding contract will have on Enbridge's applications before the Board?

RESPONSE

- a) Enbridge considers the MOU agreement ('MOU') to be terminated. The MOU was a commercial agreement between two parties and its termination does not impact the applications before the Board.

Please see the response to CCC Interrogatory #28 at I.A1.EGD(Update).CCC.28. As outlined in this response, TransCanada's actions and failure to meet obligations in the MOU resulted in Enbridge not being able to meet the principles under the Board's Storage and Transportation Access Rule ('STAR'). Section 2.6 ii) of the MOU permits termination due to inability to meet applicable laws.

Enbridge continues to have discussions with TransCanada to pursue the same principles embodied in the MOU, including the coordinated build out of regional infrastructure for short haul transport and development of the Niagara to Parkway transport path. Enbridge has posted a new capacity open season in a STAR compliant, non-discriminatory fashion. TransCanada may bid for the capacity it requires along the Parkway to Maple path, and thus achieve similar benefit of economies of scale for this portion of the path as proposed under the MOU.

Witness: M. Giridhar

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO
CONSUMERS COUNCIL OF CANADA INTERROGATORY #34

INTERROGATORY

A5. Is the proposed timing of the various components of the projects appropriate?

Reference: Ex. A/T2/S1/p. 7

- a) EGD indicates that it is continuing to consult with stakeholders. To what extent could this need to continue consulting with stakeholders impact the timing of the project? Please explain. What is the nature of the remaining stakeholder consultation?

RESPONSE

- a) Consultation with stakeholders is not expected to impact the overall timing of the project. Enbridge will continue to have open consultation and communication with stakeholders and interested parties throughout the remaining stages of the GTA Project, including planning, design, construction, and post-construction.

Stakeholder consultation will be necessary to determine technical details of the pipeline design and construction, coordinate construction scheduling, define and meet permitting requirements, and address other issues as they arise.

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO
CONSUMERS COUNCIL OF CANADA INTERROGATORY #35

INTERROGATORY

A5. Is the proposed timing of the various components of the projects appropriate?

Reference: Ex. A/T2/S1/p. 9

- a) EGD is requesting a Decision and Order from the Board by December 15, 2013. What are the implications for the proposed project timing assuming a Board Decision and Order cannot be granted by December 15?

RESPONSE

- a) Please refer to Exhibit A, Tab 3, Schedule 9 paragraph 29. Enbridge has made a significant commitment to the GTA project for the reasons noted. Enbridge will not be able to order materials and make commitments to contract resources for the November 2015 in-service date without Board approval by December 15, 2013.

Witness: C. Fernandes

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO
CONSUMERS COUNCIL OF CANADA INTERROGATORY #36

INTERROGATORY

Issue A5. Is the proposed timing of the various components of the projects appropriate?

Reference: Ex A/T3/S9/p. 13

- a) The evidence states that specific items that require firm commitments in Q1 2014 to maintain timeline for a November 2015 in-service date are the pipe and mainline valves, and the contract resources for mainline construction and Horizontal Directional Drilling. Procurement of these items would require an additional commitment of \$30-45 million for potential cancellation charges were the project not to proceed. Please explain the significance of the \$30-45 million. What are the potential reasons as to why the project would not proceed, once approved?

RESPONSE

Please refer to CCC Interrogatory # 35 found at Exhibit I.A5.EGD (Update).CCC.35. Enbridge is not aware of any reason why the project would not proceed once Board approval is received.

Witness: C. Fernandes

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO
ENERGY PROBE RESEARCH FOUNDATION INTERROGATORY #94

INTERROGATORY

Issue A5 Is the proposed timing of the various components of the projects appropriate?

Ref: EB-2012-0451 General

What will the additional costs now that approval will not be by July 31 2013?

- Land option
- Equipment
- Contractor costs

RESPONSE

Question is for Union Gas

Witness: T. Horton