

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

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.

CROSS-EXAMINATION COMPENDIUM OF
LONDON PROPERTY MANAGEMENT ASSOCIATION
("LPMA")

UNION GAS LIMITED

Answer to Interrogatory from
Board Staff

Ref: EB-2013-0074, Section 8 – Proposed Facilities, General Questions

- a) Please discuss the effects of either the Board rejecting Enbridge's proposed GTA Project facilities and/or TCPL's system expansion projects not proceeding.
- b) In the event that Enbridge's GTA Project is denied and/or TCPL's system expansion does not proceed please discuss if Union will still require the facilities it has requested in this application in order to adequately serve its in-franchise and ex-franchise customers. Please discuss if the project would be scaled back with regard to pipeline size, contract length, compressor size, etc.

Response:

a) and b)

1. Effects of Rejection or Delayed Approval of the Proposed Enbridge GTA Project

Impact to Union's Parkway West Project

A rejection of the proposed Enbridge GTA Project or a delay in the proposed Enbridge GTA Project does not impact the facilities or timing of Union's proposed Parkway West Project. As provided in Exhibit I.A1.UGL.CCC.26, Union expects that Enbridge would build its proposed Parkway West Gate Station for November 2014 to connect to Parkway West and provide security of supply for current Parkway(Consumers) and Lisgar deliveries.

Impact to Union's Brantford-Kirkwall Pipeline and Parkway D Compressor

Board Rejects Proposed Enbridge GTA Project

If the Board rejects all or a portion of the proposed Enbridge GTA Project then Union assumes that:

- Enbridge could not shift natural gas supply to the Dawn Hub as planned and would not require its incremental 400 TJ/d of Dawn-Parkway capacity
- Enbridge would no longer require the shift of 400 TJ/d of current Dawn-Parkway demand from Parkway(Consumers) deliveries to Parkway(TCPL) deliveries

In this case, Union would not build either the Parkway D Compressor or the Brantford-Kirkwall pipeline.

Without the construction of the proposed Enbridge GTA Project then the expansion of the Parkway-Maple pipeline capacity required by Gaz Métro and Union will also be impacted. Specifically, the efficiencies of sharing usage of Segment A of the proposed GTA Project would be lost resulting in no pipeline build from the Enbridge Albion Road Station to Maple or a point along the Parkway-Maple corridor. TransCanada or third parties would be forced to look at other alternatives to expand the Parkway-Maple corridor.

Once the Parkway-Maple corridor was expanded by TransCanada or a third party, Union would be able to flow the Gaz Métro and Union volumes without either the Brantford to Kirkwall pipeline or the Parkway D Compressor.

Board Delays Approval of Proposed Enbridge GTA Project

If the Board delays the approval of the proposed Enbridge GTA Project, then the Parkway D Compressor and the Brantford-Kirkwall pipeline projects would be delayed as well.

2. Effects of Suspension of TCPL System Expansion

The effects of TCPL's system expansion projects not proceeding is discussed in Exhibit I.A1.UGL.Staff.7.

UNION GAS LIMITED

Answer to Interrogatory from
London Property Management Association ("LPMA")

Ref: EB-2013-0074, Schedule B

- a) What would be the impact, if any, on the Brantford to Kirkwall and Parkway D compressor project if the Enbridge pipelines as requested in EB-2012-0451 were not approved or modified or the timing was changed?
- b) What would be the impact, if any on the Brantford to Kirkwall and Parkway D compressor project if the Union Parkway West expenditures in EB-2012-0433 were not approved or modified of the timing was changed?

Response:

- a) Please see the response to Exhibit I.A1.UGL.Staff.8.
- b) The incremental demand for Dawn-Parkway transportation capacity will require the Brantford-Kirkwall and the Parkway D Compressor to be constructed.

If the Parkway West Project was not approved by the Board, there would be a direct impact on the Parkway D Compressor project which, in turn, would result in an indirect impact on the Brantford-Kirkwall project. Union notes that Enbridge may re-evaluate its proposed GTA Project if the Parkway West Project was not approved given the significance of the supply and reliability risks detailed in EB-2012-0433 Section 8 and in Enbridge's EB-2012-0451 pre-filed evidence as may be amended.

Without the approval of the Parkway West Project some of the costs included in the Parkway West Project would have to be included in the Parkway D Compressor project. Specifically those costs would include the site development and station infrastructure costs, replacement of the NPS 26 and NPS 34 Dawn-Parkway pipelines, the Dawn-Parkway valve site, the station headers, and the land costs. This would increase the cost of the Parkway D Compressor by approximately \$90 million.

Union notes that Enbridge may re-evaluate its proposed GTA Project if the Parkway West Project was not approved given the significant concentration of supply and the reliability risks detailed in EB-2012-0433, Section 8 and in Enbridge's EB-2012-0451 pre-filed evidence.

UNION GAS LIMITED

Answer to Interrogatory from
Board Staff

Ref: EB-2012-0451, Pipeline Proposal
EB-2013-0074, Section 7 – New Dawn-Parkway System Demands, Page 10 of 14, Lines 13-14

Preamble: Union notes that it entered into a TCPL open season for transportation starting November 1, 2014 to support natural gas deliveries to Union North. However, in September 2012, Union was informed by TCPL that the incremental capacity to serve the TCPL open season bids would not be available for November 1, 2014 as provided in the open season but rather it would be available November 1, 2015. Union notes that it is expecting TCPL to expand capacity between Parkway and Maple to serve this incremental interest.

- a) To what extent are the subject OEB applications dependent on any TCPL facilities expansions, such as the Parkway to Maple Expansion Project noted above? Please explain how any delays in TCPL's facilities expansions will affect the Union and Enbridge proposals?
- b) Please discuss the potential risks of a further delay of incremental capacity from TCPL past November 1, 2015.
- c) Please discuss Union's plans to mitigate any risks from a further delay.
- d) Please discuss the potential effects of TCPL not expanding capacity between Parkway and Maple to serve the incremental interest.

Response:

(a) Gaz Métro and Union require expansion of the pipeline capacity between Parkway and Maple to realize the benefits of reduced natural gas costs for their customers. These gas cost savings are estimated to be \$103-\$138 million annually and are a result of Ontario and Québec customers having increased access to the liquid Dawn Hub. In order to support an efficient marketplace for energy, it is critical that natural gas be able to flow unimpeded to meet market demands. Restricting flow into, within and out of Ontario undermines the development of an efficient marketplace to the detriment of all energy consumers. The expansion of the Parkway to Maple corridor is necessary to provide Ontario industry, power generators, businesses and residents with increased access to the diverse and affordable natural gas supply of the Dawn Hub. The depth and liquidity of the Dawn Hub depends on the ability to move natural gas supplies to and from that trading point.

Union filed a letter with the National Energy Board dated April 29, 2013 that was received from TransCanada (see Exhibit I.A4.UGL.CCC.23) providing notice to Union that TransCanada did not receive its own Board of Directors approval to construct the proposed expansion project downstream of Parkway as expected in 2015, and as a result TransCanada had suspended further work. Union is very concerned by TransCanada's decision to suspend development activities for the 2015 build between Parkway and Maple. The following is an assessment of the impacts of the suspension of TransCanada's 2015 Parkway to Maple expansion.

Impact on Union's Parkway West Project

The facilities and timing of the proposed Parkway West Project are not impacted by a lack of pipeline capacity expansion downstream of Parkway or a delay in such a project. The Parkway West Project does not depend on system growth, but rather is predicated on providing loss of critical unit coverage for the compression at Parkway and increased reliability for the substantial interconnection with Enbridge at Parkway.

As discussed in response to Exhibit I.A5.UGL.CCC.26, Union and TransCanada are discussing an alternative to the NPS 42 pipeline proposed as part of the Parkway West Project to connect the existing Parkway Compressor Station to the new Parkway West Compressor Station. This alternative would provide a new interconnection between Union and TransCanada on the west side of Highway 407 and will require new facilities to be built by TransCanada at an existing valve site. Union considers the construction of this interconnection independent of expansion of the Parkway-Maple corridor.

Impact on Union's Brantford-Kirkwall Pipeline/Parkway D Compressor Projects

The incremental Dawn-Parkway transportation demands of Gaz Métro and Union require expansion of the pipeline capacity downstream of Parkway to serve markets beyond the GTA in northern and eastern Ontario and Québec. Without expansion of the Parkway-Maple corridor and, as such, without these incremental Dawn-Parkway demands, Union would not construct the Brantford-Kirkwall pipeline project. The Parkway D Compressor would still be required to meet the gas supply needs of Enbridge.

Impact on Proposed Enbridge GTA Project

It is Union's understanding that the only potential impact to the proposed Enbridge GTA Project as a result of a TransCanada delay in the Parkway to Maple expansion could be the size of the pipe that Enbridge builds in Segment A between Parkway and the Albion Road Station. Enbridge has identified this line as being either an NPS 36 line or an NPS 42 line. It is Union's view that this line should be built as NPS 42 given the one time opportunity to right size this critical pipeline to facilitate future expansion of the Parkway-Maple corridor, allowing Ontario customers the opportunity to increase access to the liquidity and diversity

of the Dawn Hub and to new affordable supply sources such as Marcellus and Utica shale production.

(b) Delay of the expansion of the Parkway to Maple corridor beyond 2015 creates a number of risks:

- i. Gas Cost Savings - The customers in northern and eastern Ontario and Québec that initially requested access to Dawn in 2014, would have a further delay in increased access to the diversity, liquidity and affordability of supply at the Dawn Hub. Without access to the Dawn Hub and new supply sources, natural gas cost savings in the order of \$103-\$138 million annually, will not be realized for Union North and Gaz Métro customers.
- ii. Access to Dawn - Without expansion of the Parkway to Maple corridor, Ontario customers in Union North will lose the benefit of increased access to the diversity of the Dawn Hub. As discussed in Exhibit I.A1.UGL.Staff.1 part a), the proposed crude oil pipeline conversion will leave eastern markets short of capacity to meet firm demand and to meet the significant demand for discretionary services (interruptible service and short term firm service) from northern and eastern Ontario industrials and power generators. As a result, Union expects that some Ontario customers will seek access to the Dawn Hub as well as firm transportation capacity from Dawn to the market area. It is unclear at this time given TransCanada's decision to suspend development of its 2015 Parkway to Maple expansion whether TransCanada's next open season for new capacity will allow access to Dawn and other points upstream of Parkway, such as Niagara and Chippawa (and if they do, under what terms and conditions), or just long haul paths back to Empress. Restricting access only to Empress should be a concern to Ontario and Québec industrials and power generators that would go without increased access to the diverse and economic supply of the Dawn Hub.
- iii. Liquidity at Dawn - Another risk associated with delay of incremental pipeline capacity downstream of Parkway is the impact on liquidity at the Dawn Hub. The Dawn Hub gets its liquidity today from being an attractive place to transact for both buyers (customers) and sellers (producers and marketers). The constraint in pipeline capacity between Parkway and Maple creates risk to the liquidity at Dawn because it restricts the market driven movement of supply away from Dawn making Ontario and the Dawn Hub a less attractive trading point for both buyers and sellers. Any further delay in expansion of the Parkway-Maple corridor increases risk to the health and liquidity of the Dawn Hub. Increasing access to the Dawn Hub will help attract new

supply sources to Ontario supporting a more competitive marketplace to the benefit of all Ontario energy consumers.

- iv. Turn Back Management - A delay in removing the constraints downstream of Parkway will impact Union's ability to manage future turn back of Dawn-Kirkwall capacity by limiting the ability to resell it as Dawn-Parkway capacity. A discussion of this impact can be found in Exhibit I.A1.UGL.CME.14 a).

In summary, a significant delay would compromise a number of project benefits, which are summarized at EB-2013-0074, Section 9, pages 8-11.

(c) Union remains committed to serving the needs of its Union North customers and the requested demands of Gaz Métro in 2015. Union has stated in the past that a TransCanada expansion through the Parkway to Maple corridor is preferred. To that end, Union is continuing discussions with TransCanada and other market participants to determine if a build in 2015 is possible. Given the significant risk that TransCanada is not able to or not prepared to build, Union and Gaz Métro, have initiated an environmental assessment for a pipeline between Enbridge's Albion Road Station (the end of Segment A of the proposed GTA Project) and a point at or near Maple. If required, this will support an application for regulatory approval and preserve an expansion of the Parkway-Maple corridor in 2015.

(d) Please see parts a)-c) above.

UNION GAS LIMITED

Answer to Interrogatory from
London Property Management Association ("LPMA")

Ref: EB-2012-0433, Section 1

- a) What would be the impact, if any, on the Parkway West project if the Enbridge pipelines as requested in EB-2012-0451 were not approved or modified or the timing was changed?
- b) What would be the impact, if any on the Parkway West project if the Union Brantford to Kirkwall and Parkway D compressor expenditures in EB-2013-0074 were not approved or modified or the timing was changed?

Response:

- a) Please see Exhibit I.A1.UGL.Staff.8.
- b) The Parkway West Project would not be impacted if the Brantford-Kirkwall and Parkway D Compressor facilities were not approved. The Parkway West Project would also not be impacted if the timing of the Brantford-Kirkwall and Parkway D Compressor facilities were changed.

8. The total design day flow at Parkway and Lisgar for the 2014-2015 gas-year, is forecast to be 3.9 PJ/d. To put the natural gas deliveries at Parkway into perspective and emphasize the critical nature of the Parkway facility, 3.9 PJ/d on an hourly basis is the energy equivalent of over 45,000 MW of electrical generation, an amount approximately 50% greater than the highest peak electricity demand in Ontario (27,005 MW in August 2006). Parkway is a critical infrastructure point in the delivery of natural gas for customers in Ontario, Québec and the U.S. Northeast. Ontario's industry, businesses and residents are dependent upon reliable supplies of natural gas through Parkway.

Deliveries into the TCPL system at Parkway

9. Contracted deliveries at Parkway(TCPL) have increased nearly 0.4 PJ/d since the 2011-2012 gas-year as a result of new Dawn-Parkway and new Kirkwall-Parkway contracted transportation capacity starting November 1, 2012. This new contracted capacity required the completion of the TCPL 2012 Eastern Canadian Mainline Expansion project that increased capacity between Parkway and Maple. The contracted deliveries are forecast to increase further in 2013 and require the completion of the TCPL 2013 Eastern Canadian Mainline Expansion project.

10. A number of market participants contract for deliveries at Parkway(TCPL) including Enbridge, Ontario gas-fired power generators, Gaz Métro, U.S. Northeast LDCs through the Alberta North East group, marketers, in-franchise end users and ex-franchise end users. The contracted deliveries at Parkway(TCPL) include 0.4 PJ/d for Union's bundled customers in the northern, eastern and southern franchise areas as well as 0.5 PJ/d for Enbridge. A list of the 2014-2015 gas-year contracts for transportation on the Dawn-Parkway System with a Parkway(TCPL) delivery point is provided as Schedule 6-1.

11. At Parkway, Plant A and Plant B work in parallel and on a 2014/2015 design day can deliver a maximum of approximately 2.48 PJ/d into the TCPL Mainline. When isolated, Plant A and Plant B have individual delivery capability of 1.3 PJ/d and 2.0 PJ/d, respectively, based on a 2014-2015 gas year design day. That individual capability can vary slightly depending upon design day conditions. For instance, if the design day flow requirements increase, the suction pressure decreases, which causes a decrease in the individual capabilities of each compressor. Parkway and the TCPL Mainline downstream of Parkway are highly utilized. With the

1 changing North American natural gas supply dynamics, the requirement to operate Parkway
2 compression has increased dramatically. Between November 1, 2008 and March 31, 2009,
3 the Parkway Plant B operated for 51 days, or 33% of the time. In the 78 days between
4 November 1 2012 and January 15, 2013, Parkway Plant B has for operated 58 days, or 74% of
5 the time.

6 12. The changing operation at Parkway will continue to increase reliance on Parkway
7 compression, resulting in more operating time for both compressors and an increased
8 likelihood of a failure during a period of peak demand.

9 *Deliveries to Enbridge at Parkway and Lisgar*

10 13. Enbridge contracts for deliveries of approximately 1.64 PJ/d with flexibility to designate the
11 delivery of natural gas through a combination of the Parkway(Consumers) and Lisgar
12 interconnections. The Parkway(Consumers) interconnection has a maximum capacity of
13 approximately 1.4 PJ/d and the Lisgar interconnection has a maximum capacity of
14 approximately 0.8 PJ/d. The majority of the natural gas delivered to Enbridge on a daily basis
15 is delivered at Parkway(Consumers). Lisgar is typically used as a secondary delivery point at
16 a fraction of its maximum capacity but is necessary to meet Design Day commitments.

17 14. Enbridge is the only shipper that contracts for transportation on the Dawn-Parkway System
18 with Parkway(Consumers) and Lisgar delivery points. A listing of the current long term
19 Enbridge Dawn-Parkway transportation contracts is provided as Schedule 6-2.

20 15. From the Parkway(Consumers) and Lisgar interconnections, Enbridge moves natural gas
21 directly into its distribution system through the Parkway Belt Line and Mississauga Southern
22 Link pipeline systems for delivery to consuming markets located in the western and central
23 portions of the GTA from Lake Ontario to the northern reaches of the GTA. Communities
24 served through Parkway(Consumers) and Lisgar include Mississauga, Brampton, Vaughan,
25 Richmond Hill and the City of Toronto.

26 16. Parkway(Consumers) provides natural gas supply for 58% of Enbridge's design day demand
27 within the GTA. Lisgar provides natural gas supply for another 12% of Enbridge's design
28 day demand within the GTA (EB-2012-0451:Exhibit A, Tab 3, Schedule 3, Page 20 of 24).

UNION GAS LIMITED

Answer to Interrogatory from
Building Owners and Managers Association ("BOMA")

- a) Please confirm that Union's evidence in the EB-2011-0210 case was that in the event of an outage of the 44,000 HP compressor (Unit B) at Parkway, seventy-two percent of the shortfall could be met by the smaller compressor (Unit A) at Parkway, and that absent a catastrophic incident at Parkway, there is a requirement to provide LCU protection for twenty-eight percent of volumes compressed by Unit B, and that, absent such an incident, Enbridge would continue to take up to 1646 TJ/day of gas at its Parkway gate station.
- b) Please confirm that the proposed Unit C at Parkway West will be used only as for LCU purposes and that Union does not intend to use the compressor to compress incremental gas supplies moved over the Union/Dawn/Parkway system, or from Niagara via Kirkwall to Parkway, or over any other system. Would Union use the compressor for these purposes if it were the only compressor approved in the proceeding for Parkway West?
- c) Please confirm that given the seventy-two percent coverage of LCU at Compressor B at Parkway by Unit A at Parkway, the construction of a 44,000 HP LCU compressor at Parkway West would provide (on a combined basis with Unit A) LCU protection from an outage of Compressor B at Parkway of one hundred and seventy-two percent, or almost twice the required capacity.
- d) Please provide the proposed and forecast percentage utilization of the Parkway compressor, Units A and B and the gas throughput of the compressors in each of the years 2012, 2013, 2014, 2015 to 2025, inclusive.
- e) At what percentage capacity are the existing compressor units at Parkway currently operating and what are the throughputs of the units? Please provide the analysis on a monthly basis, for design day, actual peak day, average winter day, and average summer day for each of the years, 2010, 2011, 2012, 2013 (to date), and forecast for 2014, 2015, and each year thereafter to 2025.
- f) Please discuss whether the proposed Unit D at Parkway West, the "growth compressor" will take any of the current gas currently compressed at Parkway, and whether there is any need for it to do so, or whether it will be used to compress incremental gas volumes that are not now compressed at Parkway station, which come from Marcellus or are moved on the Union Dawn-Parkway pipeline, from Dawn or to displace gas that currently is transported over the TCPL mainline, its Northern, Central, and Eastern Delivery Areas, or to compress gas for Enbridge to take at Bram West which Enbridge currently takes at Parkway (suction) or Lisgar; or incremental gas required by Enbridge. Please discuss the amounts that fall into each category.

- g) Please discuss the extent to which volumes, over the years 2010 to 2013, and projected for 2014, 2015 to 2025, consumed by Union's Central Delivery Area customers (Hamilton/Oakville area) are currently supplied by:
- i. laterals off the Dawn-Parkway system;
 - ii. laterals off the TCPL Niagara or Hamilton lines;
 - iii. by gas compressed at Parkway and moved through either Union or TCPL facilities, and which facilities. For this category of gas, please provide the transportation arrangements by which the gas is moved from Parkway to the CDA customers;
 - iv. the amount of gas currently consumed on an annual, peak, seasonal average day, both in absolute terms and in percentage of total or franchise system, in Union's Central Delivery Area. Please provide a map showing the boundaries of that area.
- h) Please provide the particulars of each contract Union currently holds on the TCPL mainline, including the capacity, the termination date, and main features, eg. FT, STFT, STS, etc. Has Union been declined to renew any of its existing TCPL contracts that end November 1 (October 31) of 2013, 2014, 2015?
- i) Please provide, by contract, the contracts that Union has declined to renew on the TCPL mainline for each of the years 2008 through 2014, with particulars for each as described in the preceding question.
- i. Does it intend not to renew any contracts that expire in future years?
 - ii. Does Union anticipate that TCPL proposed conversion of some of its facilities to oil service will cause Union, effective November 1, 2016 (or later), to be unable to renew or complete the initial term of any of its existing contracts? To what extent? Please discuss fully.
 - iii. What is Union's estimate of the likely TCPL tolls to its (Union) various delivery areas, in the event its oil east project proceeds? Compare that estimate to the current TCPL toll, the toll derived from the NEB's RH-003-2011, the tolls proposed by TCPL in its Application for Review and Variance (none of which take into account the proposed oil east project).
 - iv. To what extent is Unit D going to compress incremental volumes (that is, volumes of gas that are not now provided through another transportation path, including Union's Dawn-Parkway) for the Enbridge/GTA Influence Area, and other parts of the Enbridge system, in each of the years from 2015 to 2025, inclusive?
 - v. To what extent is the Unit D compressor to be used to compress gas that is destined for the Union northern delivery area:
 - a) to replace gas that is now supplied through Union contracts on the mainline;
 - b) incremental volume forecast to be required in the northern delivery area for the period 2015 to 2025;
 - c) please discuss the geographic part of the Union's northern delivery area to which such gas will be delivered;
 - d) provide the same analysis for Union's eastern delivery area.
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Response:

- a) Not confirmed. Parkway A does not provide LCU coverage. Although an individual unit is capable of providing a percentage of the total required flow, both Parkway A & B are required to run at full capacity to meet contracted demands.

The Enbridge contracted demands to the Parkway (Cons) and Lisgar interconnect are not dependent on the compressor, however, there are several failure modes associated with the Parkway (Cons) interconnection that would impact the flow of natural gas into the Enbridge system as outlined in EB 2012-0433, Section 8, page 71, paragraph 29.

- b) Confirmed. If the Parkway LCU unit is approved the compressor capacity will be held in reserve for loss of critical unit coverage.

Please see Exhibit I.A4.UGL.Staff 23, Part (b) for the response to a single compressor being approved.

- c) Not confirmed. Due to the requirement for Parkway A and Parkway B to operate at full capacity on design day, a loss of Parkway B would require a unit of similar size, such as the proposed Parkway C, to allow for Union to continue to provide 100% of firm contracted demands.
- d) Union does not complete forecasts beyond a 5 year horizon. Please see the table below for percentage utilization of the Parkway compressors and throughput for 2012-2018. Please note, forecast volumes assume any available surplus has been sold and utilization after 2015 is a combination of A, B & D.

Winter	Total Volume Required through Parkway Compression (TJ/d)	Power Available (MW)	Power Utilized (MW)	Utilization (%)
12/13	2235	52.9	49.3	93.2
13/14	2537	52.9	52.8	99.8
14/15	2465	52.9	52.9	100
15/16	3290	87.9	75.0	85.3
16/17	3316	87.9	74.9	85.2
17/18	3435	87.9	75.8	86.2

- e) See the response d) above for the percentage capacity and design day throughput.

Please find the actual peak, average winter day, and average summer day for 2010-2012 below. Please note, Union has calculated the utilization to respond to this question, and does not typically track this information. Additionally, Union does not track individual throughput of

the compressors, and can only provide utilization percentage. Union is not able to forecast actual peak, average winter day, and average summer day.

Binding Contracts for Dawn to Parkway Capacity

Union has moved to execution of binding contracts with Enbridge, Gaz Métro and Vermont Gas as listed in Figure 7-4 below.

Figure 7-4

<u>Shipper</u>	<u>Start Date</u>	<u>Term (years)</u>	<u>Path</u>	<u>Awarded Quantity (GJ/d)</u>
Vermont Gas	01-Nov-2014	10	Dawn to Parkway	8,100
Enbridge	01-Nov-2015	10	Dawn to Parkway	400,000
Gaz Métro	01-Nov-2015	10	Dawn to Parkway	257,784
Union Gas	01-Nov-2015	N/A	Dawn to Parkway	70,157
Total				736,041

The Open Season requested that binding transportation contracts be executed, including precedent agreements and financial backstopping agreements, thirty days after the close of the Open Season. This date was extended in order to allow parties to negotiate related downstream transportation agreements concurrently. Union now has binding transportation agreements with Enbridge, Gaz Métro and Vermont Gas subject to conditions precedent.

Related Projects

In addition to their new Dawn to Parkway System capacity, Enbridge, Gaz Métro and Union require downstream transportation to reach the intended market area.