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November 7, 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
Updated Undertaking Responses

In accordance with the Ontario Energy Board's (the "Board") Procedural Order No. 13, enclosed please find the updated undertaking responses for J6.X and J9.1.

Information in relation to the LTAA will be filed by Union Gas Limited on behalf of the applicants.

The submission is being filed through the Ontario Energy Board's Regulatory Electronic Submission System and all of the GTA evidence can be found on Enbridge's website at www.enbridgegas.com/gtaproject.

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

UNDERTAKING J6.X

UNDERTAKING

On Hearing Day 2 (September 13, 2013)[1] and Hearing Day 3 (September 16, 2013)[2], the Joint Panel committed to provide an indicative impact of the Settlement Term Sheet with TransCanada. On Hearing Day 4 (September 17, 2013)[3], Union committed to provide the impact through Undertaking J4.5 and Enbridge committed to respond to the same request on Hearing Day 6 (September 26, 2013)[4], however no separate undertaking number was assigned. The following response is provided on behalf of Enbridge.

This is an update to the October 10, 2013 undertaking and is based on information from the Settlement Agreement filed on October 31, 2013.

RESPONSE

This response provides the impact of the Settlement Agreement with TransCanada. Impacts of the Settlement Agreement include an increase in transportation costs as a result of higher TransCanada tolls and a decrease in transportation costs as a result of access to short haul transport to the Enbridge EDA, made possible as a result of the Settlement Agreement.

The toll impacts of the Settlement Agreement provided by TransCanada are a 55% increase in short haul tolls to the Enbridge Franchise and a 19% increase in long haul tolls to the Enbridge Franchise. The tolls contained in the Settlement Agreement are within the ranges Enbridge provided in its original response to J6.X.

The impact on tolls stemming from the Settlement Agreement relative to compliance tolls and the tolls provided in the original response to J6.X for transportation service utilized by Enbridge are as follows:

[1] Refer to Hearing Day 2 (September 13, 2013) transcript at page 120, line 28 to page 121, line 7.
[2] Refer to Hearing Day 3 (September 16, 2013) transcript at page 127, lines 4 to 16.
[3] Refer to Hearing Day 4 (September 17, 2013) transcript at page 54, line 22 to page 55, line 21.
[4] Refer to Hearing Day 6 (September 26, 2013) transcript at page 63, lines 10 to 17.

Witnesses: J. Denomy
M. Giridhar

$/GJ	Compliance Filing Toll	13% Increase in Long Haul & 45% Increase in Short Haul	20% Increase in Long Haul & 55% Increase in Short Haul	Settlement Agreement Toll
Empress to Enbridge CDA	1.57	1.77	1.88	1.86
Empress to Enbridge EDA	1.62	1.83	1.94	1.92
Dawn to Enbridge CDA	0.24	0.34	0.37	0.37
Dawn to Enbridge EDA	0.44	0.63	0.68	0.68
Dawn to Iroquois	0.42	0.61	0.65	0.65
Parkway to Enbridge CDA	0.12	0.18	0.19	0.20
STS to Enbridge CDA	0.12	0.18	0.19	0.20
STS to Enbridge EDA	0.32	0.47	0.50	0.50
Parkway to Enbridge CDA SN	0.13	0.19	0.20	0.20

The annual increase in gas costs resulting from the Settlement Agreement tolls provided above relative to the compliance tolls and using the October 2013 QRAM gas supply portfolio is approximately $66.4 million. This calculation is provided in the table below. The bridging contribution accounts for approximately 1/3rd of the impact on gas costs with the remaining impact accounting for cost recovery of the Eastern Ontario Triangle.

$ Millions	Total TCPL Transportation Costs October 2013 QRAM	Total TCPL Transportation Costs Settlement Agreement Tolls
	234.7	301.0
Difference Relative to October 2013 QRAM		66.4

The average annual decrease in gas supply costs resulting from the ability to displace 170,000 GJ/d of long haul transport to the Enbridge EDA with short haul transport in 2016 is estimated to be approximately $49 million per year. This expected benefit was calculated using TCPL Compliance Filing Tolls, an average Empress to Dawn basis differential of $0.51 /GJ and 100% utilization of long haul capacity.

The table below shows the annual average expected gas supply benefits for Enbridge's ratepayers arising from the GTA Project over the 2015 to 2025 timeframe for a range of basis and utilization scenarios.

Witnesses: J. Denomy
M. Giridhar

Annual Average GTA Project Benefits Calculations for Current Base Case - Basis and Utilization Scenarios @ Compliance Filing Tolls - 2015-2025				
$ Millions		Average Empress-Dawn Basis = 0.51 $/GJ	Average Empress-Dawn Basis = 0.92 $/GJ	Average Empress-Dawn Basis = 1.50 $/GJ
Enbridge CDA				
Long Haul Load Factor = 100% (January to December)	System Gas	109	62	(2)
	Direct Purchase	64	39	5
	Total	173	101	3
Long Haul Load Factor = 42% (November to March)	System Gas	138	119	92
	Direct Purchase	64	39	5
	Total	202	158	96
Long Haul Load Factor = 25% (December to February)	System Gas	145	134	118
	Direct Purchase	64	39	5
	Total	210	173	122
Enbridge EDA				
Long Haul Load Factor = 100% (January to December)	System Gas	49	21	(15)
Long Haul Load Factor = 42% (November to March)	System Gas	65	53	38
Long Haul Load Factor = 25% (December to February)	System Gas	69	62	53
Grand Total				
Long Haul Load Factor = 100% (January to December)		222	122	(12)
Long Haul Load Factor = 42% (November to March)		267	211	134
Long Haul Load Factor = 25% (December to February)		279	235	175

Enbridge has not updated the benefits resulting from the GTA Project using the tolls provided in the Settlement Agreement. With other assumptions held constant, the expected gas supply benefits using the tolls in the Settlement Agreement would be higher. However, the reason why Enbridge has not updated the benefits using tolls in the Settlement Agreement is because, while the unit increase in long haul tolls is higher than the unit increase in short haul tolls, these increases are based on a six year surcharge recovery for long haul vs. a sixteen year surcharge recovery for short haul. Over the term of the Settlement Agreement the differential in tolls is expected to be approximately the same as the differential in compliance tolls.

The combined benefits of the GTA Project and the Settlement Agreement are substantial and far exceed the increase in short haul and long haul tolls resulting from the Settlement Agreement under all but the scenario where Enbridge uses all its contracts at a 100% load factor and the basis differential between Alberta and Dawn is $1.50 or more.

As noted in evidence, 100% utilization is an unrealistic assumption given that Enbridge operates its distribution system at approximately 30% utilization factor. In addition, Enbridge has not included upstream arrangements necessary to meet growth in peak demand. The absence of short haul supply will result in ever decreasing utilization of long haul transport increments resulting in a transfer of wealth from Enbridge rate payers to other shippers on the TransCanada system. Enbridge has or is in the process of firming up approximately 360 TJ/d of long haul transport in lieu of previously contracted STFT for 2014. Enbridge would note that while the determination of final

Mainline tolls were based on an average throughput from Alberta they did not explicitly incorporate firming up of Enbridge's 2013 peak day demand or growth in Enbridge's peak day demand over time.

Finally, the basis differentials reflected in the table do not reflect changes in Marcellus basis relative to Alberta. Enbridge notes that at TGP Zone 4 Marcellus, a trading point in the Marcellus formation, gas is currently trading at approximately $2.60 /GJ, a discount of approximately $0.60 /GJ relative to AECO in Alberta. Enbridge's analysis has assumed that Marcellus basis would trade above Alberta basis. In addition, Enbridge would note that current basis differential between AECO and Dawn is approximately $0.45 /GJ.

UNDERTAKING J9.1

UNDERTAKING

TR 9, page 43

EGD to provide the expected annual total bill impact for charges by rate class that flow from applications and the settlement agreement.

RESPONSE

The Company has determined that the impact on its gas costs stemming from the Settlement Agreement[1] will be $66.4 million relative to its October 1, 2013 gas costs[2]. The original undertaking response was based on the Settlement Agreement term sheet which estimated the impact on its gas costs to be approximately $60 million. The bill impacts are relative to the October 1, 2013 QRAM rates currently in effect.

Impact relative to October 1, 2013 QRAM

Rate Class	Total Bill Impact
1	2.3%
6	2.9%
9	2.0%
100	2.8%
110	2.9%
115	3.2%
135	3.2%
145	2.8%
170	3.4%
200	3.4%

The annual dollar impact for an average residential customer would be approximately $20. There is no impact on Unbundled rates 125 and 300.

[1] Settlement Agreement among TransCanada Pipelines Limited, Enbridge Gas Distribution Limited, Union Gas Limited and Gaz Métro Limited Partnership filed October 31 2013.
[2] Page 2 of Undertaking J6.X

Witness: A. Kacicnik