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January 15, 2014

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

Filed electronically

Attention: Ms. Kirsten Walli
Board Secretary

Dear Ms. Walli:

Subject: Union 2014 Rates Application
EB-2013-0365
TransCanada PipeLines Limited (TCPL)
Interrogatories to Union Gas Limited (Union)

In accordance with the requirements in Procedural Order No. 1 dated December 20, 2013, please find attached TCPL's Interrogatories to Union.

Sincerely,
TransCanada PipeLines Limited

Original signed by

Catharine Davis
Vice President, Pipelines Law

cc: Chris Ripley, Union Gas Limited (electronic only)
Crawford Smith, Torys LLP (electronic only)

Attached

**ONTARIO ENERGY BOARD
EB-2013-0365**

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, C. 15, (Schedule B);

AND IN THE MATTER OF an Application by Union Gas Limited, pursuant to section 36(1) of the *Ontario Energy Board Act, 1998*, for an order or orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission, and storage of gas as of January 1, 2014.

To: Ms. Kirsten Walli
Board Secretary
Ontario Energy Board

**TRANSCANADA PIPELINES LIMITED
INTERROGATORIES TO UNION GAS LIMITED**

TCPL 1:

Reference:

- i) Application, Exhibit A, Tab 4, Section 6.2.2 (page 23 of 46)

Request:

- a) Please provide a table showing the Dawn-Parkway and Dawn-Kirkwall contract volumes in detail similar to the data posted by Union on its online Informational Postings of Transport Shippers. Please include the following information:
- Data by contract;
 - Include contractually committed volumes for the contract years starting Nov01/13, Nov01/14, Nov01/15 and Nov01/16 reflecting all renewal and non-renewal contract notifications to date;
 - Sort the contracts by contract holder and by receipt and delivery points;
 - Include total contractual volumes by receipt/delivery point combination for each shipper for each of the years listed above;
 - Include the total of all shipper contractual volumes by receipt/delivery point combination for each year;
 - Provide all the data requested above in spreadsheet format.

TCPL 2:

Reference:

- i) Application, Exhibit A, Tab 4, Section 6.2.2 (page 25 of 46)

Preamble:

Union discusses a new capacity open season for Dawn-Parkway and Kirkwall-Parkway capacity for service commencing Nov. 01, 2016. It is TCPL's understanding that this open season closes on Jan. 22, 2014. Union Gas states that it expects to award capacity on or before February 4, 2014.

Request:

- a) When available, please provide a summary of the bids received and the capacity awarded. The summary should include the amount of new capacity requested for each path by start date and expiry date.

TCPL 3:

Reference:

- i) Application, Exhibit A, Tab 4, Section 6.2.1 (page 25 of 46)

Preamble:

Union discusses its in-franchise customers who hold M12 Dawn-Parkway capacity. Union also states that there are currently seven customers with a total delivery obligation of 184 TJ/d holding a total of 187 TJ/d of M12 Dawn-Parkway capacity and that Union expects these customers to continue to hold their M12 capacity and voluntarily turn it back to Union as the Parkway Obligation transition to Dawn occurs, as depicted in Table 1.

Request:

- a) Please identify those seven customers and their associated Dawn-Parkway M12 capacity.
- b) Is it Union's proposal that, on April 01, 2014, those seven customers will be allowed to reduce their Parkway Obligation by 38% and be allowed to reduce their M12 capacity by the same volume. If this is not Union's proposal, please explain in detail.
- c) Please identify the reduction in volume of M12 and Parkway Obligation in GJ/d that each of the seven customers identified in (a) above will be allowed to shed on April 01, 2014.
- d) Please identify what M12 Dawn to Parkway Capacity Union will make available as existing capacity once the in-franchise customers are relieved of their obligation to deliver at Parkway.
- e) For what in-service date will Union make this capacity available?
- f) Under what terms and conditions will Union be making this capacity available?

TCPL 4:

Reference:

- i) Union's Response to TCPL Interrogatory Exhibit J27.11(a), EB-2005-0520
- ii) Application, Schedule 1, 2015 Cost Allocation by Rate Class Including the Decrease of 66 TJ/d in Parkway Obligation Delivery and M12 Demands

iii) Application, Schedule 5, 2019 Cost Allocation by Rate Class including the Decrease of 379 TJ/d in Parkway Delivery Obligation and M12 Demands

Preamble:

TransCanada seeks information to better understand the allocation units underpinning the reduction in costs allocated to ex-franchise rate classes of \$2.4 million in 2015 (reference ii) and \$15.4 million in 2019 (reference iii).

Request:

- a) Please provide the commodity-kilometers used to determine the reduction in costs allocated to ex-franchise customers in reference ii) in the same format as reference i).
- b) Please provide the commodity-kilometers used to determine the reduction in costs allocated to ex-franchise customers in reference iii) in the same format as reference i).

TCPL 5

Reference:

- i) Application, Exhibit A, Tab 4, Page 4 of 46, Table 1
- ii) Application, Schedule 8, M12/M12-X/C1 Transportation Demand Charges Including Parkway Delivery Obligation & M12 Demand Changes
- iii) Application, Exhibit A, Tab 4, Page 4 of 46, line 10-11
- iv) Application, Exhibit A, Tab 4, page 25 of 46, line 2

Preamble:

TransCanada seeks to better understand Union's Dawn-Kirkwall turn-back forecast.

Request:

- a) Please provide a description of any changes and impacts Union expects to its Parkway Obligation Proposal if the forecasted ex-franchise turn-back volumes in reference i) do not materialize, including the impact on the reduction in cost to ex-franchise customers of \$15.4 million (reference iii).
- b) Please reproduce the table in reference i) to reflect the changes and impacts Union expects to its Parkway Obligation Proposal if forecasted ex-franchise turn-back does not materialize as described in (a).

- c) Please reproduce the table in reference ii) to reflect the changes and impacts Union expects to its Parkway Obligation Proposal if forecasted ex-franchise turn-back does not materialize as described in (a). (i.e.: add an extra column titled, “Year 2018 Parkway Projects including 2019 Parkway Delivery Obligation assuming no ex-franchise turnback”).
- d) Please reproduce the table in reference ii) to include the cost of building incremental facilities which are needed assuming Union’s recently announced open season (reference iv) is fully subscribed. (i.e.: recalculate columns (b) and (c) to include the cost of incremental facilities if Union’s open season is fully subscribed).