## Reference: Exhibit B, Tab 3, Schedule 2, Table 1

- 1) Please provide the supporting calculations for the unit rates in column 10 including the supporting assumptions.
- 2) Please file the interrogatory responses of EGD in EB-2014-0039 and the EGD reply submission of March 25, 2014 in that same proceeding.

Reference: EGD Reply Submission, March 25th, 2014, page 11

Preamble: The above reference includes the following sentences:

"As discussed above, the main difference between average unit costs incurred by Enbridge and Union occurred in the month of February. In order for Enbridge to have "layered" on its purchases, Enbridge would have been required to purchase additional volumes in January in order to maintain higher-than-target deliverability in February. Such an action would have been a significant deviation from the gas supply plan developed by Enbridge and approved by the Board and any such deviation would have meant attendant risks for Enbridge."

- 3) Please provide the specific aspects of the Enbridge Gas Supply Plan that EGD believed could not be varied due to Board approval and a reference to those specific approvals.
- 4) Please provide a description with specific numeric values the "higher-than-target deliverability" in February.

## Reference: EGD Reply Submission, March 25th, 2014, page 12

Preamble: EGD states that gas supply personnel met on a weekly basis.

- 5) Please provide all internal minutes from these meetings and all correspondence (emails, etc.) that include the analysis of alternatives reviewed and actions taken as a result of colder than normal temperatures from the meetings of December to February.
- 6) Please provide the specifics of the gas supply plan for December to February that showed gas supply to be received for each month by source including expectations of unutilized transport.
  - a) Please provide specific information that was used to draw the conclusion that the deficit in storage plan could be eliminated in the subsequent period by utilizing the full transport contracted.

- b) Please provide the daily prices for the forward prompt month at Dawn throughout the months of December to February.
- c) Please provide the daily price at Dawn from December to February.
- d) For the gas brought in by peaking service, please provide the nature of the contract(s) including demand charges, notice, delivery point, etc.

Reference: Exhibit I, Tab 1, Schedule 1, Attachment 1 and EB-2012-0459 Exhibit K8.2

Preamble: In response to Board staff inquiry, Enbridge prepared Attachment 1 and stated in their response:

"The attached table provides a breakdown of the effect of higher prices for Enbridge's planned or budgeted purchases as well as the effect higher prices had on the incremental purchases required to meet the increased demand."

We would like to understand another view of last winter. In Exhibit K8.2, Enbridge provided the targeted and actual levels for storage at the end of each month starting with November. The Exhibit has been updated subsequently to include March.

- 7) For the entire period of November to March and using the format provided in Attachment 1, between columns 8 and 9, please add additional columns for Target Volume showing the Budget and Actual price consistent with the monthly actual price for delivered supply for that month in the table (column 7) and the resulting variance for those volumes. Target Volume would be defined as the volume needed to be purchased (or not purchased in later winter months as a result of earlier purchases) to meet the Targeted Volume in storage per Exhibit K8.2. For greater clarify, the intent is to show a hypothetical case of buying delivered supply throughout the winter to meet the targeted level of storage at month end throughout the winter.
  - a) Please ensure to include subtotals similar to rows 3.5 and 3.6 and a grand total for the winter.