

Joint Interrogatories of OGVG, CME and FRPO

Reference: Exhibit A, Tab 8, Schedule 1; EB-2013-0074, Schedule 8-2, Page 1.

1. The Total Southern Ontario design day demands for Winter 2015/16 increased from 1,646,924 GJ in the EB-2013-0074 application to 1,788,013 GJ in this application.
 - a. Please explain the increase.
 - b. How does the increase in projected Total Southern Ontario design day demands affect the expansion facilities proposed in this application?
 - c. For facilities planning, is all of the 141,089 GJ increase in design day demands assumed to be supplied from Dawn?

Reference: Exhibit A, Tab 8, Schedule 1

2. We want to understand what is included in Firm Service Receipts.
 - a. Please provide a detailed breakdown of the Firm Service Receipts quantity for Winter 2015/16, including design day receipts for sales customers and bundled Direct Purchase customers, and the Parkway Delivery Obligations of Direct Customers with and without M12 capacity.
 - b. Does the Firm Service Receipts quantity include all of the 60,000 GJ that Union transports through Parkway using the TCPL Dawn to Union CDA FT contract?

Reference: Exhibit A, Tab 8, Schedule 2

3. Please provide a detailed breakdown of the Firm Service Receipts for Winter 2016/17, including design day receipts for sales customers and bundled Direct Purchase customers, and the Parkway Delivery Obligations of Direct Customers with and without M12 capacity.

Reference: Exhibit A, Tab 6

4. Please update Schedule 1 and Schedule 2 to reflect the actual Dawn-Kirkwall contract renewals for 2016.

2016 Dawn Parkway System Expansion (EB-2014-0261)

Reference: Exhibit A, Tab 7, Page 8; EB-2013-0074, Section 7, page 14.

5. The three contracts that Gaz Metro has executed for 144,941 GJ for service starting November 1, 2016 are in addition to 543,000 GJ of Dawn to Parkway service that Gaz Metro currently has under contract.
 - a. Please provide the contract quantity and expiration date for each of Gaz Metro's existing Dawn to Parkway transportation contracts.
 - b. When Enbridge acquired additional Dawn to Parkway service starting November 1, 2015, Enbridge agreed to extend the primary term of its largest Dawn to Parkway transportation contract to October 31, 2022 and increase the termination notice period from the standard two years to five years. Did Union attempt to negotiate a similar term extension for any of Gaz Metro's existing Dawn to Parkway transportation contracts? If not, why not?

Reference: Exhibit A, Tab 8, Page 10

6. Does the 2016/2017 System Shortfall assume that TCPL will continue to contract for 60,000 GJ of Dawn to Parkway M12 service after Union's contract for 60,000 GJ of Dawn to Union CDA FT service expires? If so, is this a change from Union's previous forecast for Dawn-Parkway turnback? If Union has assumed the TCPL M12 contract expires on November 1, 2016, please explain how this is reflected in Table 8-2.

Reference: Exhibit A, Tab 8, Page 11.

7. Union states that each of the nine listed facilities was analyzed separately and in combination.
 - a. How much Additional Capacity is created if only the Hamilton to Milton NPS 48 Pipeline (19.5 km) is constructed?
 - b. How much Additional Capacity is created if only the Lobo C Compressor (44,500 ISO HP) is constructed?

Reference: Exhibit A, Tab 8, Page 12.

8. Please explain what is meant by "Additional Capacity" as this term is used in Table 8-3. Is this the incremental capacity to transport gas from Dawn to Parkway(TCPL), or is this number based on a mix of receipts at Dawn and Kirkwall and a mix of deliveries at Parkway and other upstream delivery points?

2016 Dawn Parkway System Expansion (EB-2014-0261)

Reference: Exhibit A, Tab 7 and Tab 8.

9. We want to understand how Union will replace the gas that is currently sourced at Empress.
 - a. For facilities planning purchases, does Union assume that system sales gas that is being delivered using TCPL services from Empress to Union NDA and Union CDA will be sourced at Dawn beginning November 1, 2016?
 - b. How much do Union's design day purchases at Dawn increase for Winter 2016/17 as a result of the termination of the TCPL services from Empress?
 - c. Is the requirement for additional Dawn-Parkway system facilities for Winter 2016/17 reduced if the gas that is currently sourced from Empress is received at Kirkwall? Please explain.
 - d. Does Union Gas plan to contract for additional TCPL FT service from Niagara or Chippawa to Kirkwall?
 - e. When comparing a new contract for transportation service from Niagara or Chippawa to Kirkwall to other alternatives, does Union Gas consider the incremental costs of on-system transmission facilities would be required, or avoided, depending on where gas is received? Please explain.

Reference: Exhibit A, Tab 8; EB-2013-0074, Section 7, Page 12.

10. Union agreed to shift 400,000 GJ of Enbridge's firm delivery entitlement under existing Dawn to Parkway transportation contracts from the suction side of Parkway compression to the discharge side of Parkway compression, effective November 1, 2015. How much is the Additional Capacity required for Winter 2016/17 reduced if one-half of the shift (200,000 GJ of the 400,000 GJ) is pushed back to November 1, 2017?

Reference: Exhibit A, Tab 10, Schedule 1

11. Please provide the projected revenue requirement for the first 15 years of service.

Interrogatories of OGVG

Reference: Exhibit A, Tab 7, Page 3

12. Respecting that this was a confidential, commercial negotiation, please provide the high-level terms where agreement could not be reached with TransCanada.

Reference: Exhibit A, Tab 7, Page 7

13. What amount of the 70,000 GJ/day will commence November 1, 2016? If zero, could the Hamilton to Milton pipe be shortened (i.e., some pipe deferred)?

Reference: Exhibit A, Tab 7, Page 14

14. Please provide a more extensive description of why the upstream diversions were not available.

Reference: Exhibit A, Tab 7, Page 19

15. Please summarize the contracting changes (annual or monthly quantities), at the margin, that were evaluated to determine the estimated savings of \$25 million.

Reference: Exhibit A, Tab 7, Page 24

16. If the Board does not approve this application, who would be responsible for the cost of the TransCanada capacity from Parkway to the delivery areas?

Reference: Exhibit A, Tab 8, Page 12

We are trying to understand why Alternative 4) was not the most effective pipeline choice.

17. Please expand Table 8-3 to include Length of Pipeline (where applicable) and the Capacity increase per unit length of the pipeline section and Cost per Unit Length

- a) Please incorporate the results for Alternative 4) Kirkwall to Hamilton
- b) Please provide a list of major factors which increase the cost of Alternative 4) relative to Alternative 5).
- c) Why would the choice not be to build the pipeline between Kirkwall and some reasonable point between Milton and Hamilton? Please provide specific reasons why this alternative cannot be considered and evaluated.