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March 6, 2015

VIA RESS, Email and COURIER

Ms. Kirsten Walli
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 26th Floor
Toronto, ON M4P 1E4

Re: Ontario Energy Board ("Board") File No.: EB-2014-0351
Application under section 38(3) of the OEB Act – Gas Storage
Compensation
Enbridge Gas Distribution Inc. – Interrogatories

In accordance with the Board's Procedural Order issued on January 15, 2015, enclosed please find the interrogatories filed by Enbridge with the Board for the above noted proceeding.

The submission will be available on Enbridge's website under the "Other Regulatory Proceedings" tab at www.enbridgegas.com/ratecase.

Please contact me if you have any questions.

Yours truly,

(Original Signed)

Bonnie Jean Adams
Regulatory Coordinator

Encl.

cc: Mr. Paul Babirad (via email and courier)

ENBRIDGE GAS DISTRIBUTION INC. ("ENBRIDGE")
INTERROGATORIES ON BABIRAD EVIDENCE

1. Please confirm the identity and relationship of each member of the Babirad family whose name appears in the land ownership records for the Property¹ (Theresa Babirad, Theresa A. M. Babirad and two people named James Babirad).
2. Please provide a copy of the document by which the applicant Jim Babirad acquired ownership of the Property. If it is not possible to provide a copy of this document, please, at a minimum, describe the nature of the transaction and the nature of the document evidencing the transaction and give the date upon which the transaction took effect.
3. Please indicate whether the size of the Property now owned by the applicant Jim Babirad is the same as the size of the property that was owned by one or more members of the Babirad family as of the date when the Crowland Pool was designated as a gas storage area (the "Designation Date"). If there has been any sale or disposition of any part of the property that was owned by one or more members of the Babirad family as of the Designation Date, please provide full details of any such sale or disposition, including the dates upon which any sales or dispositions took effect, the person or persons to whom sales or other dispositions were made, the size of the property sold or disposed of in each instance and, if possible, the names of the current owners of any parcel or parcels that were sold or disposed of.
4. Also, if possible, please provide a map or sketch showing the property that was owned by one or more members of the Babirad family as of the Designation Date and showing any parcel or parcels that have been sold or otherwise disposed of and that are not now owned by any member of the Babirad family.
5. Attached at Tab Q to Enbridge's Responding Material is a letter dated June 25, 2013 from Terry Chupa to James Babirad (the "2013 Letter"). Please confirm that the applicant Jim Babirad received the 2013 Letter. Please confirm that the applicant Jim Babirad did not respond in writing to the 2013 Letter and that he has not indicated to Enbridge that he disagrees with any of the contents of the 2013 Letter.

¹ In these questions, the "Property" is as described in the Responding Material filed by Enbridge on February 27, 2015.

6. Please confirm that the applicant Jim Babirad spoke with Mr. Chupa prior to the 2013 Letter and that Mr. Jim Babirad related to Mr. Chupa the information set out in the five “bullet points” in the 2013 Letter. If the applicant Jim Babirad is unable to confirm that the five bullet points accurately reflect statements made by him to Mr. Chupa, please provide details of any aspects of the five bullet points that Mr. Jim Babirad does not agree with, based on Mr. Jim Babirad’s recollection of the conversation with Mr. Chupa.
7. To the extent that either Mr. Jim Babirad or Mr. Paul Babirad has relied on any source not already identified in the application material for any of the information filed with the Board in connection with the application, please identify such source of information. In particular, please provide the source of the information in the “Peak Day Deliverability” column of Appendix 2 of the material filed with the Board by the applicant on January 29, 2015. Please provide the source of the information in Appendix 1 of the same filing under the column headings “Name”, “Year”, “Owner”, “DSA Acres”, and “Working Capacity”.
8. Attached (labelled Exhibit I) is a revised version of Appendix 2 from the material filed with the Board by the applicant on January 29, 2015. Please confirm that the applicant agrees with the changes that have been made in the revised version of Appendix 2 in the column headed “Peak Day Deliverability”. Should the applicant disagree with any of these changes, please provide a full explanation of the reasons for any such disagreement.
9. Attached (labelled Exhibit II) is a schematic of Union Gas’ Dawn Operations Centre. The Union Gas Limited (“Union”) schematic of the Dawn Operations Centre Storage Pools and Pipelines shows that the Edy’s Mill Pool is integrated into Union’s Lambton area storage system. Please confirm that, as shown in the schematic, the Edy’s Mill Pool is integrated into Union’s Lambton area storage system.
10. Attached (labelled Exhibit III) is a map showing the location of the Jacob Pool. This map shows that the Jacob Pool is integrated into Union’s Lambton area storage system by way of a connection to the Panhandle gas transmission line. Please confirm that, by reason of the connection to the Panhandle gas transmission line shown in the map or sketch, the Jacob Pool is integrated into Union’s Lambton area storage system.
11. The material filed in support of the application refers to “cycling” of the Crowland Pool. Please provide all information of which Mr. Jim Babirad or Mr. Paul Babirad are aware with respect to the differences between: (1) cycling of the Crowland Pool, which is connected only to the distribution system; and (2) cycling of the Lambton/Kent storage areas that can be operated (cycled) so as to address market changes and opportunities, including impacts or opportunities arising from market price volatility.

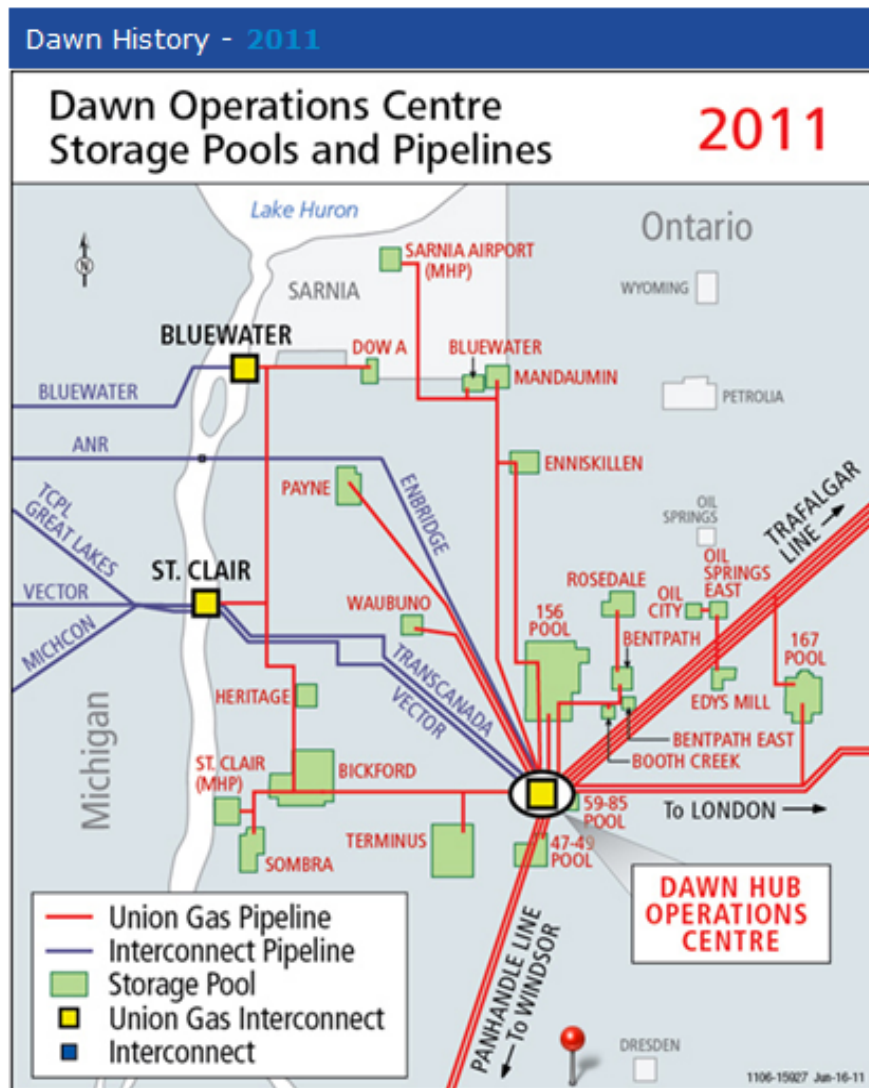
12. It appears from the Board's report regarding designation of the Crowland Pool as a gas storage area (Tab I of the Responding Material) that James Babirad participated in the designation proceeding before the Board. The Board granted an order to The Consumers' Gas Company Limited authorizing it to inject gas into, store gas in, and remove gas from the Crowland Pool on February 12, 1965 (Tab K of the Responding Material). In or about July/August of 1965, The Consumers' Gas Company Limited paid the sum of \$800 to Theresa A. M. Babirad and Theresa Babirad (Tab N of the Responding Material). Please confirm that, from the time of these events until the filing of the current application in November of 2014, no member of the Babirad family made any application for a determination of compensation payable in respect of Crowland Pool storage rights. Please explain why no application for a determination of compensation payable in respect of Crowland Pool storage rights was made until almost 50 years after the Board granted the leave to inject, store and withdraw order.

Exhibit I - Revision to EB-2014-0351 20150129 Evidence Appendix 2

| Appendix 2 Option Value "Cycling" | | | | |
|-----------------------------------|------------------------------------|------------------|-------------------------|--|
| | | Working Capacity | Peak Day Deliverability | |
| | | mmcf | Mmcf/day | |
| 1 | Crowland Storage | 297 | 35 | |
| 2 | Sombra 8-6-xv (heritage) | 950 | 50 | |
| 3 | Sombra 7-A-x1 (st Clair) | 1,116 | 55 | |
| 4 | Tipperary South | 1,437 | 45 | |
| 5 | Sarnia 2-11-VIII Pool (airport) | 5,262 | 159 | |
| 6 | Tipperary North | 1,568 | 45 | |
| 7 | Kimball-Colinville Pool | 34,093 | 635 1850 | |
| 8 | Mandaumin Pool | 3,666 | 63 | |
| 9 | Ladysmith Pool | 5,668 | 974 10 | |
| 10 | Sombra Pool | 2,066 | 35 | |
| 11 | Oil Springs East Pool | 3,708 | 62 | |
| 12 | Sombra 2-23-XII Pool (Black creek) | 862 | 147 0 | |
| 13 | Dawn 7-28-V Pool (Booth Creek) | 1,840 | 28 | |
| 14 | Oil City Pool | 1,723 | 26 | |
| 15 | Dawn 1-27-VI Pool (Bentpath east) | 4,718 | 71 | |
| 16 | Enniskillen 28 Pool | 3,500 | 50 | |
| 17 | Dawn 156 Pool | 26,369 | 371 | |
| 18 | Bickford Pool | 20,935 | 286 | |
| 19 | Payne Reef Pool | 24,734 | 337 | |
| 20 | Waubung Pool | 9,546 | 130 | |
| 21 | Sarnia 5-3-II Pool (bluwater) | 1,995 | 27 | |
| 22 | Dawn 59-85 Pool | 5,604 | 75 | |
| 23 | Terminus Pool | 11,054 | 147 | |
| 24 | Bentpath Pool | 5,046 | 67 | |
| 25 | Dawn 47-49 Pool | 4,630 | 59 | |
| 26 | Rosedale Pool | 3,147 | 40 | |
| 27 | Wilkesport Pool | 7,872 | 1003 10 | |
| 28 | Coveny Pool | 4,361 | 541 60 | |
| 29 | Dawn 167 Pool | 4,679 | 57 | |
| 30 | Sarnia 1-8-A Pool (block a) | 6,371 | 70 | |
| 31 | Edys Mills Pool | 2,426 | 26 | |
| 32 | Dow Moore 3-21-XII Pool | 26,620 | 285 910 | |
| 33 | Corunna Pool | 5,117 | 592 60 | |
| 34 | Seckerton-Seckerton North Pool | 13,045 | 1204 90 | |
| 35 | Chatham 7-17-XII Pool | 2,387 | 156 0 | |

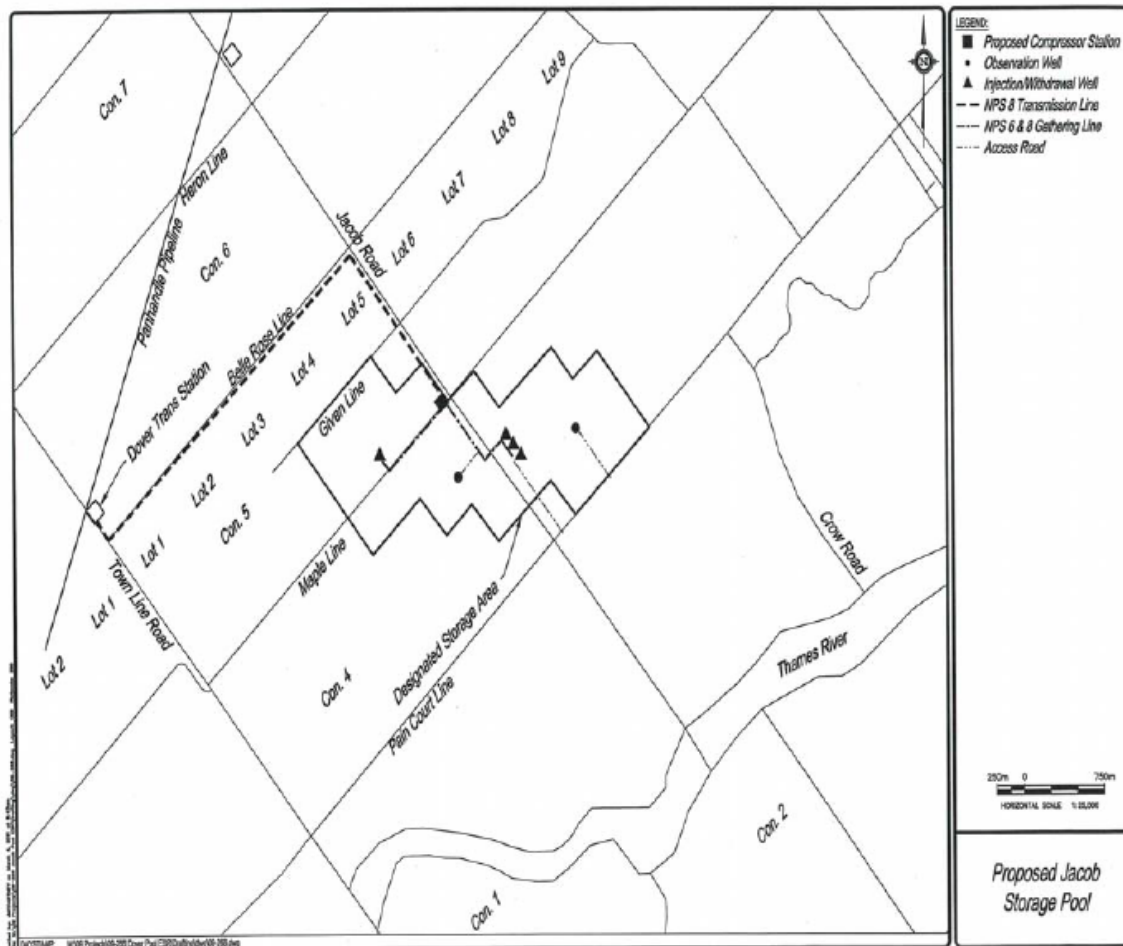
Revisions have been made only to those pools where Enbridge has access to data.

Exhibit II - Union Gas Dawn Operations Centre.



Reference: <http://www.uniongas.com/about-us/our-legacy/dawn-hub/Facilities#www.union>

Exhibit III - Jacob Storage Pool



Reference: *EB-2011-0013, 0014, 0015 Decision with Reasons Report dated July 19, 2011 Appendix B*