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March 27, 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. – Interrogatory Responses

In accordance with the Board's Procedural Order issued on January 15, 2015, enclosed please find the interrogatory responses 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.
RESPONSE TO BOARD STAFF #1

Ref: Written Evidence filed by Enbridge, February 27, 2015, paragraphs 5-37

Preamble:

Enbridge provided a history of the Crowland Pool including description of several agreements (relating to petroleum and natural gas rights and compensation) between Enbridge and previous and current landowners of the property owned today by Mr. Babirad. It appears that Enbridge offered an \$800 consideration to Mr. Babirad, which he accepted, for mineral rights under the property. In 1967 Mr. Babirad's storage rights were expropriated as he refused to sign a storage rights lease. In 1964 the Crowland pool was designated for storage and in 1965 Enbridge was granted the authority to operate the storage pool.

Starting in 2013 and continuing in 2014, Enbridge and Mr. Babirad have been meeting and communicating with regard to storage compensation issue. Paragraph 37 of Enbridge's evidence states that "...[Enbridge] did offer two options for payment of annual storage rental payments in exchange for the Babirads entering in the standard form of gas storage lease with Enbridge. The Babirads did not accept this offer..."

Question 1:

In Enbridge's view, what are the prospects of successful negotiations between Mr. Babirad and Enbridge?

RESPONSE

Enbridge had attempted settlement discussions with Mr. Babirad and due to the parties holding different views about compensation for storage rights Enbridge does not anticipate a reasonable prospect of a settlement.

ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #1

Referring to Enbridge Submission Background point #11

From the Crozier Report,

“The Board has therefore concluded that for lenticular pools, annual storage acreage rental could range from \$1.00 to \$4.00 per acre of the designated area depending on the capacity and other characteristics of the pool.”

The Crozier report also offered a range of fair and reasonable compensation rates for pinnacle reef pools. This range was \$5 - \$15 per acre.

Question #1 for Enbridge:

Given that the better quality lenticular pool would receive almost the same compensation as the poorer quality pinnacle reef pool (\$4 vs \$5), does Enbridge agree that it is fair to conclude that the Crozier Report endorsed compensation rates that were almost identical between a lenticular pool and a pinnacle reef pool?

RESPONSE

No, Enbridge does not agree that the Crozier Report endorsed compensation rates that were almost identical between a lenticular pool and a pinnacle reef pool.

As set out in Enbridge’s Responding Material (paragraph 11), the Crozier Report indicated that: (1) the annual rental figures for lenticular pools were substantially lower than any of those for pinnacle reef pools and this was consistent with the lower capacities for holding gas per productive acre of lenticular pools; (2) the formula used to determine compensation for pinnacle reef pools would not be appropriate for lenticular pools; (3) owners of more than 99% of the lands over the Crowland Pool had agreed on an annual storage rental of \$1.00 per acre; and (4) the rates agreed upon for the Crowland Pool (\$1.00 per acre) were fair and reasonable.

The Crozier Report recognized that using a capacity-per-acre measure to determine rental payments was problematic for lenticular pools. For this reason a minimum rental payment of \$1.00 per acre was determined to be reasonable, regardless of capacity or performance. This actually had the effect of increasing the Crowland Pool payment from that calculated using the capacity-per-acre measure by four to eight times (i.e., from 12 cents to 24 cents per acre up to \$1.00 per acre).

Enbridge believes that payments made to Crowland Pool landowners have been consistent with the intent of the Crozier Report.

ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #2

Referring to Enbridge Submission Background point #11

From the Crozier Report,

“The Board has therefore concluded that for lenticular pools, annual storage acreage rental could range from \$1.00 to \$4.00 per acre of the designated area depending on the capacity and other characteristics of the pool.”

The Crozier report also offered a range of fair and reasonable compensation rates for pinnacle reef pools. This range was \$5 - \$15 per acre.

Question 2 for Enbridge:

Does Enbridge agree that it is fair to conclude that the Crozier Report recognized that a wide range of compensation rates would apply to both lenticular pools and pinnacle reef pools depending on their capacity and other characteristics?

RESPONSE

While the Crozier Report referred to the possibility that there “could” be a range of rentals for lenticular pools, there is only one lenticular gas storage pool operating in Ontario and that is the Crowland Pool. The Crozier Report confirmed that the rate (\$1.00 per acre) agreed upon with owners of most of the Crowland Pool lands is fair and reasonable. In this regard, please see the response to Babirad Question #2 found at Exhibit I.EGDI.Babirad.2.

The Crozier Report referred to a range of compensation rates for pinnacle reef pools, but it has become apparent since the time of the Crozier Report that a range of rates for Enbridge’s Lambton area pinnacle reef pools is not appropriate, because the Lambton area pools are operated as an integrated system.

ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #3

Referring to Enbridge Submission Background point #17 and #19

Accompanying this Submission of Questions are copies of documents presented to Mr. Babirad upon taking ownership of the property in 1957.

Quoting from the Charles A. Kramer Declaration,
“That the Gas Lease Registered #12457 dated 23rd June 1930 and registered on the 5th day of December 1930 in favour of W. C. Patterson has terminated and no renewal has been executed.”

Mr. Babirad has never signed a P&NG lease with Consumers Gas Syndicate/Consumers Gas/Enbridge or any other entity.

Mr. Babirad has never received any compensation from a P&NG lease.

Question #3 for Enbridge:

Does Enbridge assert that a valid P&NG lease existed between Enbridge (Crowland Gas Syndicate/Consumers Gas) and Mr. Babirad at any time?

RESPONSE

Enbridge does not have full knowledge of the history of the Petroleum and Natural Gas rights relating to the property owned by the applicant Jim Babirad. Enbridge was not previously aware of the lease referred to in this question, namely, the Gas Lease dated June 23, 1930, and registered on December 5, 1930, in favour of W. C. Patterson.

As set out in Enbridge's Responding Material (paragraph 17, pages 5 to 6), Enbridge is aware that a previous owner of the property, Charles Kramer, entered into a lease with Crowland Gas Syndicate on August 27, 1951. In 1962, the Consumers' Gas Company Ltd. (now Enbridge) acquired whatever interest the Crowland Gas Syndicate held under the Kramer lease at that time. As for the indication in this question that Mr. Babirad has never received any compensation pursuant to a P&NG lease, the Kramer lease contains provisions relating to annual rentals and delay payments. While the property was purchased by James Babirad and Theresa Babirad on April 24, 1957 and later conveyed to Theresa Babirad and Theresa A. M. Babirad on March 4, 1959, Enbridge is not in a position at this time to provide evidence regarding any payments made to the Babirad family under the Kramer lease.

ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #4

Referring to Enbridge Submission Background point #32

A clarification of Mr. Chupa's summary of a conversation between Mr. Chupa and Mr. Babirad on June 25, 2013.

With reference to point (a),
Mr. Babirad communicated to Mr. Chupa that he had rejected a proposal from Enbridge (Consumers Gas) to sign a storage lease that offered Mr. Babirad \$1 per acre for 42 acres for the next 20 years.

Mr. Babirad told Mr Chupa that he received \$800 from Enbridge (Consumers Gas) around the summer of 1965 in exchange for the property's mineral rights.

With reference to point (b),
Mr. Babirad never contacted Consumers Gas about future payments (or anything else) in 1984.

Referring to Enbridge Submission Background point #39(a) and #41

According to data obtained from the Ontario Oil, Gas and Salt Resources Library, the Crowland Pool's peak day deliverability is 35mmcf/day. However, on September 6, 1977 Enbridge (Consumers Gas) applied to the Minister of Natural Resources under the Petroleum Resources Act 1971 for permits to drill wells "in order to increase the deliverability of the Crowland Pool from 35mmcf/day to 45 mmcf/day."

Question #4 for Enbridge:

As of March 2015, what is the Crowland Pool's peak day deliverability expressed in mmcf/day?

RESPONSE

For gas distribution purposes, peak day deliverability has a different meaning than peak deliverability. Peak day deliverability is the day (the peak day) the utility experiences the highest demand for gas. For storage purposes the term peak deliverability is the maximum amount of gas that can be withdrawn from a storage pool.

The Crowland Pool has a maximum deliverability of 30 mmcf/day ($35.4 \cdot 10^3 \text{ m}^3/\text{hour}$). This rate can be sustained for two to three days after which it falls to 70% of the maximum and continues to fall by approximately 10% per day. Maximum deliverability is restored once gas is moved back (i.e., injected) into the reservoir.

ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #5

Based on the OGSR Library data there are at least 7 pinnacle reef pools whose peak day deliverability (expressed as mmcf/day) is less than or equal to the Crowland Pool.

Enbridge's background point #41 states that,

"By any reasonable measure, the Crowland Pool is significantly outperformed by any pinnacle reef pool in respect of which Enbridge makes storage lease payments."

Question #5 for Enbridge:

Why does Enbridge not consider peak day deliverability (expressed as mmcf/day) as a reasonable measure?

RESPONSE

Enbridge recognizes the importance of pool deliverability, but deliverability is only one of several measures considered important in evaluating a reservoir's performance and usefulness. In this regard, please refer to Enbridge's Responding Material, at paragraphs 38, 39 and 40.

As stated in Enbridge's response to Babirad Question #4 (Exhibit I.EGDI.Babirad.4), the Crowland Pool can sustain maximum deliverability for about three days. Even at the maximum rate it only provides approximately 20% of the Niagara Region's average winter-day gas demand.

ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #6

Referring to Enbridge Submission Background point #39(b)

Question #6 for Enbridge:

On a dollars basis, what percentage of the company's operating and maintenance budget does the Crowland Pool absorb?

RESPONSE

Although the cost to operate and maintain the Crowland Pool is typically less than one-tenth of one percent ($< 0.1\%$) of the total Enbridge annual budget for Operating & Maintenance expenses, the cost per unit of storage is about ten times that of Enbridge's Lambton area storage system. In this regard, please refer to Enbridge's Responding Material, at paragraph 39(c), pages 12 to 13.

ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #7

Referring to Enbridge Submission Background #39(c)

Quoting from background point #39(c)

“In contrast, the Crowland Pool is not operated as part of an integrated system. It is isolated and primarily used to support Enbridge’s Niagara Region gas distribution system.”

Question #7 for Enbridge:

What percentage of the Crowland Pool’s storage operations are devoted to utility versus non-utility (unregulated storage) services?

RESPONSE

The Crowland Pool is operated entirely for the purposes of the regulated gas distribution utility.

ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #8

Quoting from Section 4.3 of the Enbridge financed Elenchus Report: An Assessment of Reasonable Compensation Amounts to the Enbridge Gas Distribution Inc. Crowland Gas Storage Leaseholders

“The one exception to the integrated nature of the LCKHC reservoirs would be the Tipperary Reservoir that feeds into Union’s local distribution system...”

Question #8 for Enbridge:

Is it not true that despite being isolated and not being connected to the “integrated system” the landowners of the Tipperary Pool receive the Lambton benchmark rate?

Enbridge Response

The Tipperary Pool is not one of Enbridge’s gas storage areas. Enbridge does not pay compensation to the Tipperary Pool landowners and it has played no role in the determination of the amount of compensation to be paid to those landowners. Enbridge and Elenchus are not aware of the specific compensation amounts paid to the Tipperary Pool landowners, although they understand that, in an Order¹ dated May 31, 2005, the Ontario Energy Board approved a compensation agreement with the landowners, the details of which were not made public.

¹ RP-2003-0253/EB-2003-0315

ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #9

At an OEB hearing on July 14, 2006 (EB-2005-0551) Mr Robert Craig who at the time was Director of Gas Storage for Enbridge commented,

“Now, beyond the pinnacle reef belt there hasn’t been a lot of storage that’s been developed in Ontario. Enbridge Gas Distribution has the only sandstone pool that is in the Niagara peninsula, the Crowland pool. It’s a small pool, and its strategically located within their franchise area”

There must be strategic benefits to being located within the franchise area.

Question #9 for Enbridge:

Would Enbridge please provide some examples of the strategic benefits of being located within a franchise area that its Director of Gas Storage in 2006 was referring?

RESPONSE

Unlike all of Enbridge’s other gas storage areas, which operate as an integrated system in close proximity to gas transmission pipelines and the Dawn hub, the Crowland Pool is located in one of Enbridge’s franchise areas and is connected to the distribution system. The benefit of having the Crowland Pool connected to the Niagara Region’s distribution system is that it can offset some need for gas to be delivered into the area during high-demand periods. Of course, the relatively small capacity of the Crowland Pool limits this benefit to a few days and less than 20% of the overall gas demand on an average winter day.

ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #10

Under the heading CME INTERROGATORY #9 of EB-2014-0276 Enbridge noted,

“Included in the Company’s 2015 supply plan is the acquisition of 11.4 Bcf during the months of November and December 2015 to be delivered at Niagara. While the Company is negotiating with various suppliers for the delivery of gas at the Niagara inter-connect, it can be assumed that these supplies will originate from the Appalachin Basin.”

The Appalachin Basin is currently the least expensive source of natural gas for Ontario’s end users. The two main import points of Appalachin Basin shale gas are located 20km (Chippewa interconnect) and 40km (Niagara interconnect) from the Crowland Pool.

Question #10 for Enbridge:

Would it be accurate to suggest that the Crowland Pool’s location in Niagara will save Enbridge’s customers in the Niagara Region the operating cost of shipping the Appalachin Basin gas through TCPL’s Niagara pipeline then Union’s Kirkwall interconnect and then down Union’s pipeline to the Dawn Hub and then back again to the Niagara Region?

RESPONSE

No, the location of the Crowland Pool in Enbridge’s Niagara franchise area does not result in any material difference in the cost of shipping gas along the transportation path described in this question. The Crowland Pool is so small that any impact it could have on the cost of shipping gas along this path is insignificant.

For the purposes of managing its gas supply, Enbridge includes the Niagara region in a much larger distribution area known as the Central Delivery Area (“CDA”). Enbridge manages the reliability and security of its gas supply, as well as its gas supply costs, by using multiple sources and receipt points for the delivery of gas into the CDA. Enbridge takes a balanced approach to reliance on non-traditional sources of gas supply (such as shale gas) as it seeks to act in the best interests of all customers, not just customers in a specific geographic area.

ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #11

Under the heading CME INTERROGATORY #9 of EB-2014-0276 Enbridge noted,

“Included in the Company’s 2015 supply plan is the acquisition of 11.4 Bcf during the months of November and December 2015 to be delivered at Niagara. While the Company is negotiating with various suppliers for the delivery of gas at the Niagara inter-connect, it can be assumed that these supplies will originate from the Appalachin Basin.”

The Appalachin Basin is currently the least expensive source of natural gas for Ontario’s end users. The two main import points of Appalachin Basin shale gas are located 20km (Chippewa interconnect) and 40km (Niagara interconnect) from the Crowland Pool.

Question #11 for Enbridge:

Are there any other benefits of having a storage pool located so close to the Niagara/Chippewa import points for Appalachin Basin shale gas?

Enbridge Response

At this time Enbridge does not consider there to be any benefit arising from the location of the Crowland Pool in relation to the Niagara or Chippewa interconnects.

ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #12

Referring to Enbridge Submission Background point #49

Quoting from the Executive Summary of the Enbridge financed Elenchus Report,

“Elenchus is of the view that the principles established in the Crozier Report are still valid and result in just and equitable compensation for storage leaseholders. The annual compensation amounts (\$/acre) to Crowland leaseholders should take into account both the “use and usefulness of storage” (Principal #8 from Crozier Report) as well as the relative quality of the Crowland reservoir compared to other storage reservoirs (Principal #6 from the Crozier Report).”

Principle #6 from the Crozier Report,

“Storage rental payments should be based upon the capacity and performance rating of the storage reservoir”

There exists a wide variation in the capacity and performance rating of all the storage reservoirs in Ontario. Every storage pool in Ontario except for the Crowland pool receives the same Lambton benchmark rate as a storage rental payment.

The Elenchus Report only requires Principle #6 of the Crozier Report to be applied to the Crowland pool. According to the Elenchus Report, all other storage reservoirs in Ontario do not have to satisfy Principle #6 of the Crozier Report.

Question #12 for Enbridge:

Of all the storage reservoirs in Ontario, why does Enbridge require that only the Crowland pool satisfy Principle #6 of the Crozier Report?

Enbridge Response

Enbridge does not require that only the Crowland Pool satisfy the statement from the Crozier Report that is referred to in this question. As discussed in its Responding Material, Enbridge believes that the determination of storage compensation should take into account a broader range of considerations than any one single metric or principle. Enbridge’s Responding Material (at paragraphs 38 and 39, pages 10 to 13) sets out a number of factors that are important in assessing the value of a pinnacle reef storage reservoir compared to the Crowland Pool. This evidence brings out that Enbridge’s

Lambton area storage pools share multiple characteristics and are operated as an integrated system, meaning that, for the Lambton area storage pools, it is the overall performance of the integrated system that is most important, not the performance of any one individual pool.

ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #13

Quoting from section 6.4.2 of the Enbridge financed Elenchus Report,

“Elenchus also reconsidered developing a uniform payment (\$/acre) that would be paid to Crowland leaseholders using the LCKHC compensation amounts. This too was rejected as it creates an inequity with the other higher quality reservoirs in LCKHC.”

Both the Enbridge financed Elenchus Reports’ data on capacity (mmcf/acre) as well as the Ontario Oil, Gas and Salt Resources Library data on capacity (mmcf/acre) highlight a vast difference in the relative attractiveness of all the various storage pools.

The Payne Reef, Dow Moore and Waubuno reservoirs average about 22.3 mmcf/acre. The Black Creek, Heritage and Edy’s Mills reservoirs average about 2.1 mmcf/acre. The higher quality pools are over 10 times more attractive than the lower quality pools based on the productivity metric that the Crozier Report emphasized as being the most important.

All of the landowners in the above mentioned pools receive the same Lambton benchmark compensation rate. An inequity exists right now under the current industry practice since the landowners of Payne Reef, Dow Moore and Waubuno should receive roughly 10 times more \$/acre than the landowners of Black Creek, Heritage and Edy’s Mills.

Question #13 for Enbridge:

If Enbridge is rejecting the concept of uniform payments for all storage pools because of inequity, why does Enbridge accept the industry’s current system given the inequity imposed upon the landowners of Payne Reef, Dow Moore, Waubuno and the other higher quality reservoirs?

RESPONSE

Because all reservoirs are formed by natural processes, no two reservoirs will be identical and there will be variations in physical and performance characteristics. The Enbridge reservoirs in the Lambton area all exhibit similar but not identical characteristics in terms of working capacity per acre, working capacity per well and deliverability per well. They are also similar in geology as well as geometry or shape, which affect some of the physical characteristics. As well, these reservoirs are similar in geography or location. The close proximity of the Lambton area reservoirs to one

another has facilitated the operation of these reservoirs in an integrated fashion, such that they can be operated more economically, with greater flexibility. The development of these reservoirs in a centralized location by Enbridge has also allowed for economics of scale both in respect of facility requirements and in respect of operating requirements, which further adds to the synergies among the Lambton area reservoirs.

All of Enbridge's storage reservoirs are pinnacle reef formations except for the Crowland Pool. The Crowland Pool is a sandstone reservoir. In comparing some of the performance characteristics of the pinnacle reef pools, such as working capacity per acre (Enbridge Responding Material Tab X, page 15 - Elenchus Report Figure 8), working capacity per well (Enbridge Responding Material Tab X, page 16 - Elenchus Report Figure 9) and deliverability per well (Enbridge Responding Material Tab X, page 17 - Elenchus Report Figure 10), it can be seen that some reservoirs exhibit higher performance in certain characteristics whereas other reservoirs show higher performance in other characteristics. From a comparison of these same three performance characteristics of the pinnacle reef pools to the Crowland sandstone reservoir, it is evident that the Crowland reservoir falls below the lowest performing pinnacle reef pool for each characteristic by more than an order of magnitude.

Elenchus did not examine the specific operating characteristics of storage areas operated by Union Gas Limited, such as the Payne and Waubuno reservoirs. Enbridge does not pay compensation to landowners in respect of pools operated by Union and Enbridge has played no role in the determination of the amount of compensation to be paid to those landowners. Enbridge is aware that Union does not operate any gas storage area that is a sandstone reservoir or a lenticular pool and that Union does not operate any gas storage area that is as distinct from the rest of its storage reservoirs as the Crowland Pool is from all of Enbridge's pinnacle reef storage pools.

ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #14

Quoting from section 6.2 of the Enbridge financed Elenchus Report,

“It is clear that from the onset that while there has been a historical relationship between these payments; the level of payments made to Crowland leaseholders has been less than the payments made to other leaseholders.”

In 1965 Crowland pool leaseholders received \$1/acre and Lambton County leaseholders received \$5 -\$15/acre. Fifty years later the Crowland lease holders receive \$6/acre and Lambton County leaseholders receive about \$136/acre.

As it relates to absolute levels or the rate of change in these absolute levels there exists no historical relationship between the Crowland and Lambton County compensation rates. The best one could surmise about the historical relationship between the two is that they both went up.

Question #14 for Enbridge:

What historical relationship does Enbridge believe exists between Crowland landowner's compensation and Lambton County landowner's compensation?

RESPONSE

The graph in Figure 12 of the Elenchus Report (Enbridge Responding Material, Tab X, page 20) illustrates several points. It shows, first, that, up to 2004, there have been increases in the payments made to Crowland landowners and that these payment increases have generally occurred at a similar time as the payment increases for Lambton/Kent landowners. Second, since the lines plotted on the graph start and end (up to 2004) in close proximity, Figure 12 visually illustrates that the percentage increase in payments to Crowland landowners has been similar to the percentage increase in payments to Lambton/Kent landowners. Furthermore, since the scale of the payments to Lambton/Kent and Crowland landowners is \$0 to \$160 and \$0-\$10, respectively, the ratio of the maximum amount of these two scales (i.e., 160:10) represents the relationship between the payments. The historical relationship between these payments up to 2004 has therefore averaged approximately 16 to 1.

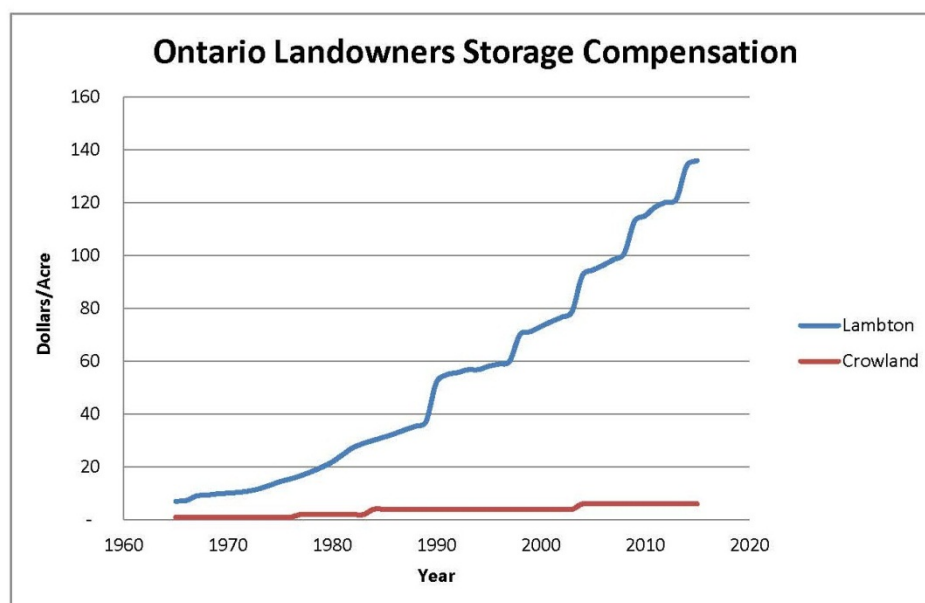
This historical relationship is considerably more difficult to identify without the use of a dual scale graph. The relationship is not evident from the graph provided in Babirad Question #15 (Exhibit I.EGDI.Babirad.15). The use of the dual scale was not only

clearly identified on the graph itself, but was also explicitly pointed out in paragraph 6.2 of the Elenchus Report (Enbridge Responding Material, Tab X, pages 19 to 20) to alert the reader in advance of reviewing the graph that a dual scale had been used.

**ENBRIDGE GAS DISTRIBUTION INC.
RESPONSE TO BABIRAD QUESTION #15**

Question #15 for Enbridge:

Why did Enbridge choose to illustrate storage leaseholder payments using a double sided y-axis graph when a standard one sided graph (such as the one shown below) was much more appropriate?



RESPONSE

A one sided graph would not have been more appropriate. The purpose of the graph provided by Elenchus was to compare the rate of change in compensation payments over time (rather than just the absolute amounts over time) for Lambton/Kent and Crowland landowners. The comparison of the rate of change (or slope) over time is most effectively shown with the dual-scale graph used by Elenchus. As explained in the response to Babirad Question #14 (Exhibit I.EGDI.Babirad.14), the historic relationship between payments to Lambton/Kent landowners and payments to Crowland landowners is considerably more difficult to identify without the use of a dual-scale graph.