

REF: Exhibit A, page 9, lines 4-6

Preamble: “Ontario is very fortunate to be in close proximity to this supply basin, and yet Ontario does not currently have access to a direct pipeline route from this basin to Dawn.

- 1) Please provide a map showing the natural gas pipelines that currently connect with Southern and Eastern Ontario at locations other than Dawn.
 - a) Please identify the name of the pipeline and the capacity into Ontario

REF: Exhibit A, page 10, lines 4-6

Preamble: “Without access to the abundant and affordable supplies in the Utica and Marcellus shale basins, gas prices at Dawn, and therefore energy prices in Ontario, would be disconnected from the continent-wide lower costs resulting from these emerging supplies. In other words, the cost of energy in Ontario would not benefit from the moderating effect of the low-priced natural gas in the Appalachian Basin available to neighbouring areas.”

- 2) Please provide quantitative evidence that demonstrates that with existing infrastructure, Dawn is disconnected and not currently benefiting from the lower prices available to neighbouring areas.

REF: Exhibit A, page 21, Figure 4-2

- 3) Please graph the percentage of annual gas received on to the Union Gas south transmission system at the various receipt points (Ojibway, St. Clair, Dawn, Kirkwall and Parkway) at five year intervals culminating in 2017 with proposed Nexus volumes added.

REF: Exhibit A, page 24, lines 14-18

- 4) Please provide a map showing the pipeline route of Rover including the pipelines that connect at the receipt and delivery points.
 - a) Please provide the standard toll offered.
 - b) Please provide the volumes threshold required to access the MFN tolls and the reduction associated with this class of shippers.

REF: Exhibit A, page 24, line 18 – page 25, line 2

- 5) To the extent that NEXUS and Rover are competing projects, should the Board take actions that benefit one project over another?
- 6) To the extent that it would be positive for Ontario for both the NEXUS and Rover projects to be completed, as Union suggests, does Union agree that it would be beneficial to Ontario for Union Gas to contract for some amount of capacity in each of the two projects?

REF: Exhibit A, page 28, lines 11-14

Preamble: The NEXUS transportation capacity is intended to service customers in Union North and Union South, and will be allocated based on a split of approximately 2/3 for Union South and 1/3 for Union North.

- 7) What are the actual quantities of NEXUS capacity that will be allocated to the Union EDA, Union NDA, and Union NCDA delivery areas?
- 8) For each year over the 15-year term of the NEXUS contract, what is the additional transportation cost to deliver the gas from Dawn to each of the Union North delivery areas that will be allocated NEXUS capacity?
- 9) Please provide the January 2015 landed cost analysis shown in Schedule 5 for each of the Union North delivery areas that will be allocated NEXUS capacity.

REF: Exhibit A, page 39-43

Preamble: We would like to have clarity on the timelines and specifics associated with the evolution of the Precedent Agreement (PA).

- 10) How much capacity was Union awarded in the non-binding open season of late 2012?
- 11) How much capacity was committed to in the August 11, 2014 PA?
- 12) Please provide a copy of the August 11, 2014 PA.

- 13) Prior to August 11, 2014, what would have been the commercial consequences to Union to not entering into a binding precedent agreement (deposits, bid guarantee, etc.).
- 14) Specifically when did Union agree to an increase in capacity from 75,000 to 150,000 Dth/d?
- 15) Prior to signing the May 28, 2015 PA, what would have been the commercial consequences to Union to:
- a) Contract for 75,000 Dth/day
 - b) To not contract for any capacity?
- 16) When did Union provide notice of non-renewal to Alliance pipeline to cease capacity on that pipe from Empress?

REF: Exhibit A, page 41, lines 6-8

- 17) Using the same analysis, please estimate the savings if Union were to contract for 150,000 Dth/d at Niagara from TCPL?
- 18) Using the peak day analysis for 2017/8, please provide the Dawn to Parkway capacity (in GJ/day) that would “freed up” if an additional 150,000 Dth/day (158,258 GJ/day) was received at Kirkwall on a peak day (how much additional gas could leave Dawn and arrive at Parkway keeping all parameters constant with the exception of the incremental receipts at Kirkwall).
- 19) Was the Union Gas’ SENDOUT model used to assess the pipeline alternatives?
- a) If so, please provide a summary report of the results.
 - b) If not, why not?

REF: Exhibit A, page 43, line 5

- 20) How many pipelines converge to feed the receipt point at Kensington, Ohio?

REF: Exhibit A, page 45, lines 15-16

- 21) What rates did other anchor shippers receive? Please provide a range of rates (if appropriate, tied to volume commitment).
- 22) How does Union evaluate competitiveness in this context?

REF: Exhibit A, page 48, lines 14-15

23) How much additional pipeline capacity has Union identified for November 1, 2017?

REF: Exhibit A, page 51, lines 16-19

24) How does Union foresee the gas getting to Ontario in these interim arrangement?

25) How will ratepayers be protected while Union is gaining this experience?

Ref: Exhibit A, Schedule 5 and EB-2014-0261, Exhibit B.OGVG_FRPO_CME.9(e)

Preamble: In the EB-2014-0261 proceeding, Union stated that “When evaluating options for new transportation services Union considers all of its guiding principles including the impacts of the delivery point on Union’s facilities.”

26) Please explain how Union included the impact of the delivery point on Union’s facilities when comparing the TCPL Niagara to Kirkwall route, with delivery at Kirkwall, to the NEXUS/St. Clair route, with delivery at Dawn, in its landed cost analysis.

27) If an incremental gas supply resource is added for Union South, will the requirement for additional Dawn-Parkway transmission system facilities be less if the new supply is delivered at Kirkwall instead of Dawn?

28) What is the projected 100% load factor Union firm transportation charge from Dawn to Parkway for 2018 (demand rate and fuel)?

29) What is the projected 100% load factor Union firm transportation charge from Kirkwall to Parkway for 2018 (demand rate and fuel)?