

REF: Exhibit A, Tab 3, Schedule 1, page 16, para. 44

Preamble: We would like to understand better, the evolution of the Precedent Agreements outlined in this paragraph.

- 1) Please provide a copy of the original PA signed June 5, 2014.
- 2) How much capacity was committed to in the original PA?
- 3) Please provide the analysis that supported the original acquisition of capacity and the intent to contract for 150,000 Dth/day.
- 4) Please provide the analysis that was done to support a reduction to 110,000 Dth/day.
- 5) Please provide any additional criteria that contributed to the decision to reduce the contract.
- 6) What changed from Enbridge's perspective that drove the desire to decrease the commitment?
- 7) Please provide all internal correspondence, presentations and materials that were used in obtaining approval of this reduced level of commitment.

REF: Exhibit A, Tab 3, Schedule 1, page 18, para. 48

- 8) In subsection a), please define the review of regional supply
 - a) What options flow from that review?
- 9) In subsection b), what happens to the Agreement if no approval has been granted after 90 days post October 1st?
 - a) What are the commercial consequences?
 - b) Who bears the risk?

REF: Exhibit A, Tab 3, Schedule 1, page 21, para. 57

- 10) Did Enbridge have exploratory discussions with Rover prior to the announcement in June 2014?
 - a) When did those discussions start and cease?

- b) What prompted Enbridge to end the discussions?

**REF: Exhibit A, Tab 3, Schedule 1, page 23, Table 1, Appendices B and C and
EB-2015-0166 Schedule 4**

- 11) What is the delivery of the landed costs in Table 1?
- 12) Please provide all of the assumptions that support escalation of gas cost at Niagara between 2020 and 2021.
- a) Please provide any supporting documentation or calculation to arrive at this forecast.
 - b) The forecasted gas cost of Niagara is greater than Dawn for the remaining period of evaluation. However, in the Union Contracting analysis, Niagara prices are a relatively constant discount to Dawn for the entire period. Can Sussex reconcile these two views?
 - c) Please provide the contributing factors that led to the reversal of the basis differential between Dawn and Niagara between the analysis in Appendix B and Appendix C.
- 13) Using the format in Appendix C for May 2015, please provide the landed costs at for the different pipelines for receipt at Parkway.
- 14) Using the format in Appendix C for May 2015, please provide the landed costs at for the different pipelines for receipt at Iroquois (assuming ability to access gas via Wright on the Iroquois pipeline flowing north)
- a) If TCPL were to make a commitment to provide service from Waddington to Iroquois, would Enbridge consider accessing some of its portfolio for the Ottawa service territory at Iroquois? If not, why not?
 - b) Would 40 TJ/day be greater or less than the base load for the Ottawa service territory in the summer?

REF: Exhibit A, Tab 3, Schedule 1, Appendix D, page 22, subsection d)

- 15) Given Enbridge's date of filing and the time frames provided in PO 1 has Enbridge communicated risk that approval may not be received by Oct. 1st in request of the waiver?