līl Bennett Jones Bennett Jones LLP 4500 Bankers Hall East, 855 - 2nd Street SW Calgary, Alberta, Canada T2P 4K7 Tel: 403.298.3100 Fax: 403.265.7219

Nicholas M. Gretener Partner Direct Line: 403.298.3405 e-mail: gretenern@bennettjones.com Your File No.: EB-2015-0200

September 4, 2015

DELIVERED BY COURIER & EMAIL

Ms. Kirsten Walli, Board Secretary Ontario Energy Board 2300 Yonge Street Suite 2701 Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: File No. EB-2015-0200 Union Gas 2017 Dawn Parkway Project

We act as for Alberta Northeast Gas, Limited (ANE) and as such request that we be added to the list of parties for service. Please see the contact information below:

Mr. Nick Gretener Bennett Jones LLP 4500 Bankers Hall East, 855 – 2nd St. SW Calgary, AB T2P 4K7 Tel: 403.298-3405 Fax: 403.265-7219 Email: gretenern@bennettjones.com

Pursuant to Procedural Order No. 2, we are filing the enclosed interrogatories of ANE in regards to the above noted matter.

Yours truly olas I Grete Nic

Cc: Ms. Karen Hockin, Union Gas (khockin@uniongas.com) Mr. Crawford Smith, Torys LLP (csmith@torys.com) Intervenors

ONTARIO ENERGY BOARD

Union Gas Limited

Application for pre-approval of the recovery of the cost consequences associated with the installation of three new compressors along Union's Dawn pipeline transmission system.

EB-2015-0200

Interrogatories From

Alberta Northeast Gas, Limited

September 4, 2015

TURNBACK RISK

Reference: Application, Exhibit A, Tab 6, Pages 16 - 9

- **Request:** 1. Please provide the following information related to ex-franchise service on the Dawn Parkway system for each of the last ten years:
 - (a) Shipper, MDQ, rate schedule, contract number, contract start date, contract end date;
 - (b) Turn-back quantities by shipper and rate schedule indicating effective dates.
- **Reference:** Application, Exhibit A, Tab 6, Pages 16 9
- **Request:** 2. Please describe the results of all reverse open seasons conducted by Union associated with potential Dawn Parkway service over the last years including shipper and quantities as well as the impact on any proposed facility construction.

PROJECT COSTS

- **Reference:** Application, Exhibit A, Tab 9, Page 1
- **Request:** 3. Please provide an estimated breakdown of the \$622.5 million project cost between replacement of existing facilities and construction of new facilities along with associated workpapers.
- **Reference:** Application, Exhibit A, Tab 9, Schedule 6
- **Request:** 4. Please provide Exhibit A, Tab 9, Schedule 6 in Microsoft Excel format with inputs and formulas intact.
- **Reference:** Application, Exhibit A, Tab 9, Schedule 6
- **Request:** 5. Please explain why general overheads are not shown in the economic feasibility analysis provided as Exhibit A, Tab 9, Schedule 6.
- **Reference:** Application, Exhibit A, Tab 9, Pages 2 3
- **Request:** 6. Please provide the Stage 1 DCF Economic Feasibility Test analysis of the proposed project excluding the estimated cost of the replacement facilities including associated workpapers.

CAPITAL PASS THROUGH MECHANISM

- **Reference:** Application, Exhibit A, Tab 10, Page 4
- **Request:** 7. Please provide all relevant materials setting forth in detail the EB-2011-0210 Board-Approved cost allocation methodologies including Board approvals and associated materials detailing the methodologies.
- **Reference:** Application, Exhibit A, Tab 10, Page 4
- **Request:** 8. Please provide Union's 2013 Board-Approved cost allocation study including all applicable workpapers and supporting materials.
- **Reference:** Application, Exhibit A, Tab 10, Tables 10-1 and 10-2, Pages 6 7
- **Request:** 9. Please provide workpapers detailing the information presented in Exhibit A, Tab 10, Tables 10-1 and 10-2.
- **Reference:** Application, Exhibit A, Tab 10, Pages 8 9
- **Request:** 10. Please provide workpapers showing the derivation of cost components allocated on the basis of rate base and O&M as described on Exhibit A, Tab 10, pages 8-9. Also provide the cost allocation study and associated workpapers showing the reallocation of the cost components.
- **Reference:** Application, Exhibit A, Tab 10, Schedules 1 and 2
- **Request:** 11. Please provide Exhibit A, Tab 10, Schedules 1 and 2 in Microsoft Excel format with inputs and formulas intact.
- **Reference:** Application, Exhibit A, Tab 10, Schedule 4
- **Request:** 12. Please provide detailed workpapers associated with Exhibit A, Tab 10, Schedule 4
- **Reference:** Application, Exhibit A, Tab 10, Page 1
- **Request:** 13. Please provide a list of other major capital projects that qualified for treatment under the capital pass-through mechanism during the term of Union's existing IRM.
- **Reference:** Application, Exhibit A, Tab 10, Page 1

Request: 14. Please indicate the annual revenue requirement and rate impact by rate schedule of any reallocation of general or other overhead costs resulting from each capital project identified in the previous question and all associated workpapers.

TAXES

- **Reference:** Application, Exhibit A, Tab 10, Schedule 1
- **Request:** 15. Please provide detailed calculations showing the derivation of Exhibit A, Tab 10, Schedule 1, line 9.
- **Reference:** Application, Exhibit A, Tab 10, Schedule 4
- **Request:** 16. Please recalculate the rates shown in Exhibit A, Tab 10, Schedule 4 by allocating 100% of the incremental tax impacts noted on Exhibit A, Tab 10, Schedule 1, line 9 to the rates for rate schedules associated with the proposed expansion.

GROWTH OPPORTUNITIES

- **Reference:** Application, Exhibit A, Tab 8, Table 8-2, Page 9
- **Request:** 17. Please indicate potential opportunities for incremental service to utilize the 30,393 GJ/d of surplus capacity as indicated on Exhibit A, Tab 8, Table 8-2.
- **Reference:** Application, Exhibit A, Tab 8, Pages 6 8
- **Request:** 18. What is the maximum annual revenue that could be realized from the sale of all surplus capacity on the Dawn Parkway system.
- **Reference:** Application, Exhibit A, Tab 8, Pages 6 8; Application, Exhibit A, Tab 10, Schedules 1 5
- **Request:** 19. Please provide the cost allocations and rates that would result if the incremental revenues identified in the previous question were realized at the time the facilities are placed in service. Provide workpapers including schedules that correspond to Exhibit A, Tab 10, Schedules 1 through 5.