Tribute Resources Inc.

EB-2015-0206

BOARD STAFF INTERROGATORIES

ON MPAC INTERVENOR EVIDEENCE

1. Ref: MPAC's Evidence, dated September 15, 2015.

Preamble:

MPAC filed 4 sets of data without providing a rationale and purpose for including this information:

- Tab A: "The GRAD Document" with the data used in the 2012 Current Value Assessment for Tribute;
- o Tab B: a table with all of the pipelines assessed to Tribute;
- o Tab C: all of the pipelines assessed to Dundee Energy by municipality;
- Tab D: includes all of the field gathering pipelines in Ontario assessed using regulated rates set in Table 2 of O. Reg 282/98.

Questions:

- a. Referring to Tabs A and B, please explain the regulatory basis and the method applied to assess Tribute's pipelines.
- b. In the context of Tribute's application, please explain the purpose and relevance of including the information contained in Tab C and Tab D.
- c. Please identify the sections that contain the assessment of the pipelines subject to dispute between Tribute and MPAC.
- 2. Ref: MPAC's Evidence, dated September 15, 2015, page 2 paragraphs 7, 8 and 9.

Preamble:

MPAC stated it relies on pipeline companies to report the pipelines and that the assessment is based on these reports. MPAC also states that the "pipelines at issue were reported to MPAC under s. 25 of the Assessment Act"

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Questions:

 a. Please identify who filed the report on Tribute's pipelines, and the date of that report.

- b. Please file an excerpt of the report that contains specific pipelines that are subject to this application.
- 3. Ref: MPAC's Notice of Intervention, page 3 and Assessment Act.

Preamble:

The Assessment Act in section 25(1) defines "pipeline" as a pipeline for the transportation or transmission of gas that is designated by the owner as a transmission pipeline and a pipeline for the transportation of oil.

Question:

Please provide MPAC's interpretation of the term "transportation" and "transmission" or how it is applied by MPAC.

4. Ref: MPAC's Notice of Intervention, pages 2 and 3.

Preamble:

MPAC states that it is Tribute's position that its pipelines are not "transmission" pipelines but "gathering" pipelines and therefore, they should be assessed using the Current Value, not the Linear Method.

Questions:

- a. Are there other "gathering" pipeline companies currently being assessed by MPCA using the Linear Method?
- b. When was Tribute first assessed with respect to its gathering lines and what was the method used?