

**REF: Exhibit A, Tab 1, page 8**

Preamble: *“The 2016 LRAM volume adjustment of 234,127 10<sup>3</sup>m<sup>3</sup> includes 2014 LRAM volumes of 120,313 10<sup>3</sup>m<sup>3</sup> and 2011 LRAM volumes of 113,813 10<sup>3</sup>m<sup>3</sup>, as provided at Working Papers, Schedule 17.”.*

1. Is Union aware of any precedent for this proposed approach?

**REF: Exhibit A, Tab 1, page 13**

Preamble: *“Consistent with the 2015 methodology, Union adjusted the general service storage and delivery rates for the 2014 actual NAC, using the Board-approved weather normal methodology blend of 50:50 (30-year average and 20-year declining trend). For 2016, the NAC adjustment is the variance between 2013 Actual NAC and 2014 Actual NAC, as seen in Working Papers, Schedule 12 .”*

2. Please provide the weather data, consumption by rate class and the underlying working papers in support of the NAC values.

**REF: Exhibit A, Tab 1, page 24**

3. Is the Parkway (EGT) Point the new takeoff point that is also served by the TCPL Domestic Line.
  - a. Please a pipeline schematic of the Parkway plants showing the Enbridge and TCPL feeds emanating from the Dawn-Parkway or TCPL Domestic Lines.

**REF: Exhibit A, Tab 2, page 2**

Preamble: *“As of November 1, 2017 Union forecasts additional PDO reduction of 23 TJ/d, of which 16 TJ/d is for customers without M12 service and 7 TJ/d is for customers with M12 service (including TCE Halton Hills)”.*

4. Do the above numbers assume the completion of the 2017 Dawn-Parkway build?
  - a. If not, please any differences.
  - b. If so, what limitations does Union have to offering the surplus capacity from that build to further reductions to the Parkway Delivery Obligation.

**REF: Exhibit A, Tab, 3, page 27 & EB-2015-0166 Exhibit B.T1.Union.LPMA.7**

5. Please add the DTE Energy (MichCon) and Market Based Contracts to the Landed Cost Analysis previously provided in the Nexus proceeding.
  - a. How were the rates for the DTE Energy established?

**REF: Exhibit A, Tab 3, page 33**

Preamble: *“Additionally, growth in the communities of Oakville and Burlington and the southern portion of Milton is forecast to increase design day demand on the Burlington Oakville System. This increase in design day demand will exceed the capacity to supply the Burlington Oakville System as of November 1, 2016. Growth in Burlington Oakville System demand requires Union to add incremental pipeline capacity. Contracting for incremental third party transportation from TransCanada or the secondary market is not feasible.”*

6. Please confirm that Union contracted for capacity from Union Parkway Belt to communities starting Nov. 1/15.
7. Please confirm that this term that this capacity was available for was not limited to the 1 year term contracted but could have been contracted for up to 15 years complete with renewal rights.
8. Please confirm there was additional capacity available on this path in excess of what Union contracted for.
  - a. Please quantify the incremental capacity available.
  - b. Based upon growth forecasts for this area, please provide the number of years of growth this incremental capacity would serve.
9. Please provide the TCPL Existing Capacity Open Season document to which Union responded to access this capacity.