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**File No. 339583/000233**

May 4, 2016

**By Electronic Filing**

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> floor  
Toronto, ON M4P 1E4

Dear Ms Walli,

<b>Re:</b>	<b>Enbridge Gas Distribution Inc. (Enbridge) Storage and Transportation Access Rule (STAR) Application</b>
<b>Board File No.:</b>	<b>EB-2016-0028</b>

Please find enclosed the Interrogatories of Canadian Manufacturers & Exporters (CME) to Enbridge, in this proceeding.

Yours very truly,

A handwritten signature in black ink, appearing to be 'VJD', followed by a long horizontal flourish.

Vincent J. DeRose  
VJD/kt  
Encl.

- c. Andrew Mandyam (EGD)  
Fred Cass (Aird & Berlis)  
All Interested Parties EB-2016-0028  
Paul Clipsham and Ian Shaw (CME)

OTT01: 7614483: v1

**IN THE MATTER OF** section 36 of the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15, Sched. B, as amended;

**AND IN THE MATTER OF** an Application by Enbridge Gas Distribution Inc. for an Order or Orders approving a tariff pursuant to the *Storage and Transportation Access Rule*.

**INTERROGATORIES OF  
CANADIAN MANUFACTURERS & EXPORTERS (CME)  
TO ENBRIDGE GAS DISTRIBUTION INC. (Enbridge)**

**CME 1**

Ref: Exhibit B, Page 3 of 13

*Preamble:*

In EB-2012-0451, Enbridge advised the Board and interested parties that it intends to use 800 TJ/day of capacity on the Albion pipeline to serve its in-franchise distribution customers and to make available 1,200 TJ/day of capacity for transportation purposes.

*Question:*

- (a) Please confirm that Enbridge still intends to use 800 TJ/day of capacity on the Albion pipeline to serve its in-franchise distribution customers.

**CME 2**

Ref: Exhibit B, Page 8 of 13

*Preamble:*

Enbridge states at paragraph 39 that TransCanada Pipelines Limited (TransCanada) has confirmed to Enbridge that it “intends” to bid for all available transportation capacity on the Albion Pipeline in excess of the 800 TJ/day to be used by Enbridge for distribution purposes.

*Questions:*

- (a) Did TransCanada confirm its intention to bid for all available transportation capacity on the Albion Pipeline in excess of 800 TJ/day in writing? If yes, please provide a copy of that correspondence.
- (b) If TransCanada confirmed its intention to bid for all available transportation capacity on the Albion Pipeline in excess of 800 TJ/day verbally, please describe the details and circumstances of that conversation. In providing this description,

please advise whether there was any discussion on the length of the term which TransCanada would be willing to commit to, or the potential Contract Demand Charge for that transportation capacity.

- (c) Does Enbridge agree that until it holds an open season for transportation service on the Albion Pipeline, TransCanada is not contractually required to bid for any of the available transportation capacity on the Albion Pipeline in excess of the 800 TJ/day?
- (d) Has TransCanada indicated how long it is willing to contractually commit to 1,200 TJ/day on the Albion Pipeline?

### CME 3

Ref: Exhibit B, Page 8 of 13, paragraph 40

#### *Preamble:*

Enbridge states that while it has not yet held its open season for transportation service on the Albion Pipeline, it has assumed for the purposes of the Rate 332 Rate Schedule that the full amount of transportation capacity available in 2016, namely, 1,200 TJ/day, will be contracted capacity.

#### *Questions:*

- (a) When does Enbridge anticipate that it will hold its open season for transportation service on the Albion Pipeline?
- (b) Does Enbridge require the approvals for Rate 332 transportation service sought in this Application prior to conducting the open season for transportation service on the Albion Pipeline? If yes, please explain why the approvals are required prior to conducting the open season. If no, please explain why Enbridge is seeking Board approval for Rate 332 prior to the open season.
- (c) If TransCanada does not bid for all available transportation capacity on the Albion Pipeline, does Enbridge believe that other parties will respond to the open season for transportation service on the Albion Pipeline such that the full amount of the transportation capacity available in 2016 will be contracted capacity? If yes, which parties other than TransCanada does Enbridge believe would respond to the open season?
- (d) If the total contracted capacity on the Albion Pipeline in excess of the 800 TJ/day to be used by Enbridge for distribution purposes is less than 1,200 TJ/day, will this have any impact on the costs allocated to in-franchise customers? To be clear, CME wishes to understand whether the utilization of the Albion Pipeline in excess of 800 TJ/day can have any financial impact on Enbridge's in-franchise distribution customers. If there is any potential impact on any in-franchise distribution

customers that flows from the utilization of the 1,200 TJ/day of transportation capacity in excess of the 800 TJ/day used by in-franchise customers, please explain.

OTT01: 7614254: v1