

CME INTERROGATORY #1

Interrogatory

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.

Response

a) Confirmed.

Witness: J. LeBlanc

CME INTERROGATORY #2

Interrogatory

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?

Response

a) TransCanada confirmed this through its execution of the Mainline Settlement Agreement. The Mainline Settlement Agreement was filed with the Ontario Energy

Witness: J. LeBlanc

Board at the EB-2012-0451 application<sup>1</sup> on November 1, 2013. Section 11.1(d) of the Mainline Settlement Agreement states

...Enbridge will, in accordance with STAR, issue a new open season for all available transmission capacity on Enbridge's Segment A Pipeline that is in excess of Enbridge's capacity of 800,000 GJ/day conditional upon the successful bidders having sufficient transportation capacity both downstream and upstream (in the case of TransCanada, Mainline Shippers having upstream capacity) of the Segment A Pipeline and TransCanada will bid to contract for such capacity either directly or through an assignment of capacity from Union and Gaz Metro (or any other prospective shipper), subject to any required OEB approval.

- b) TransCanada's intention to bid was confirmed as detailed in response (a) above.
- c) No, Enbridge does not agree. See response to (a) above.
- d) TransCanada, as a shipper on the Albion Pipeline, will be subject to the Board approved Tariff and will therefore be required to contract for a term of at least 15 years on the initial transmission capacity on the Albion Pipeline assuming the Board approves the terms of the proposed Tariff found at Section 2.1 of the FT Service Schedule (Exhibit B, Attachment II. page 51 of 65).

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[http://www.rds.ontarioenergyboard.ca/webdrawer/webdrawer.dll/webdrawer/search/rec&sm\\_udf10=eb-2012-0451&sortd1=rs\\_dateregistered&rows=200](http://www.rds.ontarioenergyboard.ca/webdrawer/webdrawer.dll/webdrawer/search/rec&sm_udf10=eb-2012-0451&sortd1=rs_dateregistered&rows=200)

CME INTERROGATORY #3

Interrogatory

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.

Witnesses: A. Kacicnik  
J. LeBlanc

Response

- a) As mentioned at Exhibit B, page 13, paragraph 71, Enbridge aims to proceed with the open season for Parkway to Albion King's North Transportation capacity in early August of 2016.
- b) The STAR requires Enbridge to obtain approval of its transmission service tariff, which sets out the terms and conditions upon which the service will be offered. While prior Ontario Energy Board approval of the open season documents is not required, interested shippers would likely want certainty about service terms and conditions. Also, because Enbridge is seeking to commence Rate 332 service on November 1, 2016, it is necessary for Enbridge to obtain Ontario Energy Board approval well in advance of that date.
- c) TransCanada is obligated to bid for all of the initial transmission capacity on the Albion pipeline. See response to CME Interrogatory #2(a) see Exhibit I.EGDI.CME.2.
- d) Please see response to CCC Interrogatories #1 and 3 at Exhibit I.EDGI.CCC.1 and Exhibit I.EDGI.CCC.3

Witnesses: A. Kacicnik  
J. LeBlanc