REF: Tab 2, Schedule 4, EB-2016-0245 Ex. A, Tab 3, pg. 31-32
and EB-2017-0091 Ex. A, Tab 4, Schedules 1 and 2

Preamble: We would like to understand better the process undertaken in making purchasing decisions on behalf of ratepayers and the underlying the quantum of costs that are being applied for prospective recovery including the source of those costs.

In the Gas Supply Memorandum filed with EB-2016-0245, Union states:

"To facilitate and take advantage of Union North having access to Dawn, Union recognized the importance of supporting the NEXUS Pipeline to introduce growing Appalachian supplies into Dawn and ultimately into the northern portfolio. Approximately 50,000 Dth/d of supply transported on NEXUS Pipeline will be used to serve a portion of the Union North East sales service customers' requirements from Dawn.

The balance of the supply transported on the NEXUS Pipeline (100,000 Dth/d) will allow the Union South portfolio to further diversify and introduce additional security and exposure to more stable pricing in the Appalachian shale region. In addition to 100,000 Dth/d of transportation on the NEXUS Pipeline for Union South, Union anticipates in excess of 100,000 GJ/d of uncommitted pipe in 2017. Union will evaluate and analyze potential pipeline paths and supply sources in the context of its Gas Supply Planning Principles. These principles ensure customers consistently receive secure, diverse natural gas supply at a prudently incurred cost and minimal risk……

Starting November 1, 2015, Union entered into a contract for firm transportation capacity of 20,000 Dth/d (21,101 GJ/d) from Dominion South Point to Dawn for a one-year term. By contracting for this transportation service originating at Dominion South Point, Union was able to purchase gas supply at Dominion South Point, a very liquid and active location for most Appalachian producers and marketers. This allowed Union to gain experience purchasing from a variety of suppliers in the Appalachian region in order to gain additional experience and form relationships prior to the in-service date of the NEXUS Pipeline.

Union will purchase supply to fill the NEXUS Pipeline on annual and multi-year terms, as well as on a seasonal and monthly basis.".

1) Please update the Transportation Analysis Contracting Analysis Tables in Schedules 1 and 2 of EB-2017-0091 Ex. A, Tab 4 to add:
   a) The forecasted cost for the path from supply source to Dawn of the Nexus path.
   b) The forecasted cost for the path from supply source to Dawn of the TCPL Dawn Long-Term Fixed Price ("LTFP") offering.
   c) If not already shown, the current cost of 20,000 Dth/d from Dominion South to Dawn.
      i) If already shown, please specify which line and confirm that the transportation cost reflects the actual cost Union is paying.

   ii) If not already shown, please describe the path the gas takes to get to Dawn and the cost of respective segments of the path.

2) Please produce a copy of the Open Season held by TCPL for Dawn LTFP.
   a) Please provide the analysis that Union Gas undertook to determine the economics of the Dawn LTFP path in comparison with other sources of gas to Dawn.
   b) Please confirm that while the project was targeted at Western Canadian Producers, there was no conditions in the Open Season that Union Gas precluded from submitting a bid.
   c) Please provide the Union Gas rationale in choosing not to bid any volumes from this service as part of its Gas Supply portfolio.

3) In the Gas Supply Memorandum, Union identified that in addition to additional gas arriving via Nexus, *"Union anticipates in excess of 100,000 GJ/d of uncommitted pipe in 2017"*.
   a) Please provide the chosen approaches to acquiring the additional 100,000 GJ/day.
      i) Please provide the supporting analysis which Union preformed to choose the means of meeting that supply requirement.
   b) Please confirm that Nexus does not have FERC approval to proceed with construction.
   c) Are the anticipated costs for Nexus included in Union's request for prospective recovery of landed costs in the QRAM application?
      i) If so, please provide Union's approach to acquiring gas for this winter if Nexus cannot deliver until spring of 2018?
      ii) Are ratepayers at risk for any additional costs if Nexus cannot deliver for this winter? Please provide the basis for this response.
         (1) If ratepayers are at risk for additional costs, please describe Union's mitigation efforts.

REF: Tab 2, Schedule 4 and EB-2017-0181 Ex. Q3-3 Tab 1, Schedule 1

Preamble: We would like to understand better Union's derivation of the prospective rate riders and the underlying supply and transportation costs that contribute to the prospective recovery.

4) For the year ending June 30, 2018, please present the forecasted costs for the Union South portfolio in the same format as displayed by Enbridge in the above referenced evidence submitted for its third quarter QRAM.