ENBRIDGE

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April 6, 2018

VIA RESS, EMAIL and COURIER

Ms Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ms. Walli:

Re: Enbridge Gas Distribution Inc. ("Enbridge")
Union Gas Limited ("Union")
EB-2017-0306 MAADs Application
EB-2017-0307 Rate Setting Mechanism Application
Undertaking Responses

In accordance with the Ontario Energy Board's (OEB) Procedural Order #4, enclosed please find the following Undertaking Responses filed by Enbridge and Union in the above noted proceedings:

- JT2.4;
- JT2.9;
- JT2.12;
- JT3.1;
- JT3.4;
- JT3.7
- JT3.10;
- JT3.12; and
- JT3.18 to JT3.20.

With today's submission, Enbridge and Union have filed all the Undertaking Reponses from the Technical Conference held in this proceeding.

Further to Enbridge's and Union's submission, enclosed please also find an updated undertaking response JT3.9.

Please contact me if you have any questions.

Yours truly,

(Original Signed)

Andrew Mandyam
Director, Regulatory Affairs

cc: Mr. F. D. Cass, Aird & Berlis LLP (via email)
Mr. M. Kitchen, Union Gas Ltd (via email)
All Interested Parties EB-2017-0306 & EB-2017-0307 (via email)

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Kitchen
To Dr. Lowry

REF: Tr.2 p.37

To provide forecasts of the gross in the three measures of operating scale.

Response:

Customer additions are shown in the response to FRPO Interrogatory #11 found at Exhibit C.FRPO.11, Table 1 and 5 for EGD and Union, respectively.

The Applicants did not use a volume forecast to develop the application. However, provided in response to Board Staff Interrogatory #54 found at Exhibit C.STAFF.54, Attachment 2, p. 32 is a forecast of consumption, which was used as part of developing Union's 2018 to 2027 Asset Management Plan. Similar data for EGD is not available.

The associated Union South distribution peak day information is shown below. Similar data for EGD is not available.

Design Day Demands for Union South[1]:

Year	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026	2026/ 2027
(TJ/d)	3335	3371	3374	3467	3511	3515	3535	3621	3621	3629

[1]Includes all general service and contract rate classes combined

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Redford
To Mr. Gluck

REF: Tr.2 p.143

To provide the total amount of storage capacity that is located in Ontario and provide the percentage of that amount that is owned by Union and Enbridge.

Response:

In total, there is 306.8 PJ of storage capacity in Ontario[1]. Union, Enbridge and affiliate Market Hub Partners Canada L.P. own 99.1% of the total storage capacity in Ontario (this includes the 50% interest in the Sarnia Airport Storage Pool owned by Market Hub Partners Canada L.P.). AltaGas owns the other 50% interest in the Sarnia Airport Storage, which represents the remainder of the total storage capacity in Ontario (0.9%).

However, Union and EGD storage competes in a larger geographic market that, at a minimum, includes Ontario, Michigan, northern Illinois, northern Indiana and the National Fuel Gas territory in western New York and Pennsylvania[2] (as defined in NGEIR). There is almost 1.2 Tcf (approx. 1,300 PJ) of working gas capacity in the geographic market defined in NGEIR. With the development of incremental pipeline infrastructure leading from the Marcellus/Utica shale gas production area (which was not developed at the time of NGEIR), in the Applicants' view the geographic market is growing to include other states and more New York and Pennsylvania storage assets.

[1] EB-2017-0306/EB-2017-0307, Exhibit C.SEC.23, Page 2
[2] EB-2005-0551, Decision with Reasons, section 3.5, page 38

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Charleson
To Mr. Gluck

REF: Tr.2 p.160

To determine the value of Union Gas marketed regulated storage versus EGD'S contracted regulated storage and its financial impact

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Response:

Please see Table 1 on the following page for the requested hypothetical analysis of the benefit to EGD customers if market-based storage capacity was replaced with Union's cost-based excess utility storage space from 2013 to 2017. Line 5 shows an estimate of the potential benefit that could have accrued to EGD rate zone customers and Line 9 shows the foregone benefit to Union rate zone customers.

In any year, the analysis shows that EGD rate zone customers are better off in this scenario and Union rate zone customers are worse off. The Applicants' position, which maintains the current storage arrangements, is consistent with the no harm test.

Table 1
Comparison of Union's Excess Utility Storage Space Benefit
to EGD Customers and Union Customers

Line No.	Particulars (000's)	2013	2014	2015	2016	2017
		(a)	(b)	(c)	(d)	(e)
	EGD Customer Benefit					
1	Union Excess Utility Storage Space (PJ)	8.6	6.4	5.0	6.4	6.8
	Average EGD Market-Based					
2	Storage Rate ($CAN/GJ) (1)	0.810	0.727	0.665	0.699	0.726
3	EGD's Estimated Market-Based Storage Cost	6,966	4,653	3,325	4,474	4,937
4	Union's Excess Utility Storage Space Cost (2)	3,218	2,331	1,779	2,402	2,489
5	Potential Net Benefit to EGD Customers	3,748	2,322	1,546	2,072	2,448
	Union Customer Benefit					
	Union Short-Term Firm Peak					
6	Storage Revenue (3)	4,747	3,235	4,935	5,627	4,618
7	Union's Excess Utility Storage Space Cost (2)	3,218	2,331	1,779	2,402	2,489
8	Less: Shareholder Incentive	153	90	316	322	213
9	Foregone Net Benefit to Union Customers	1,377	814	2,840	2,902	1,915

Notes:

(1) The average EGD market-based storage rate is calculated as the average rate paid for all market-based storage capacity contracted in each year. The average rate for EGD market-based storage is likely not reflective of what EGD's storage portfolio would have been if Union's excess utility storage space had been made available to EGD in those years.

(2) Attachment 1, line 11, columns (b) - (f).

(3) Attachment 1, line 6, columns (b) - (f).

Customers in Union North and Union South currently receive a net benefit in rates of $4.5 million from the sale of short-term storage and other balancing services. Of this amount, $2.3 million is related to the sale of Union's excess utility storage space as short-term firm peak storage ($7.9 million revenue less $5.6 million of cost and shareholder incentive) and $2.2 million related to the sale of other short-term storage and balancing services ($2.5 million revenue less $0.3 million of shareholder incentive). The difference between the actual net benefit obtained in any year and the net benefit in rates is recorded in the Short-Term Storage Deferral Account (No. 179-70) and is trued up annually as part of the deferral account clearing process. Please see Attachment 1 for the details of Deferral Account 179-70 split out by short-term firm peak storage and other short-term storage and balancing services for the years 2013 to 2017.

For purposes of the requested analysis above, it was assumed only the revenue associated with the short-term firm peak storage service would be replaced by EGD's use of the excess utility storage space and that the net revenue from other short-term storage and balancing services would continue to accrue to Union's ratepayers (less cost and shareholder incentive).

If the Board ordered Amalco to utilize Union's excess utility storage space for EGD in-franchise requirements, consideration would need to be given to the $2.3 million net benefit in Union's rates and the charge to EGD customers for the use of the storage space.

In its NGEIR Decision (EB-2005-0551), the Board determined that Union should be required to reserve 100 PJ (approximately 95 Bcf) of space at cost-based rates for in-franchise customers (p. 83). This capacity met the needs of Union South and Union North customers at the time of NGEIR plus allowed for further capacity (capped at 100 PJ total) to serve the needs of Union North and Union South customers at cost-based rates. The Board also determined that Union will have the flexibility to market the excess utility storage (difference between 100 PJ and the capacity required to meet in-franchise demands in any year) (p. 83) with the entire margin on storage transactions that are underpinned by utility storage space accruing to Union's ratepayers, less an appropriate incentive payment to the utilities (p. 101).

In the Applicant's view, the amalgamation does not impact the NGEIR decision.

UNION GAS LIMITED
Details of Revenue and Costs and Calculation of Balance
in Short-Term Storage Deferral Account (No.179-70)

Line No.	Particulars ($000's)	Short-Term Firm Peak Storage						Other Short-term Storage and Balancing Services						Total					
		Board-Approved 2013	Actual 2013	Actual 2014	Actual 2015	Actual 2016	Draft Actual 2017	Board-Approved 2013	Actual 2013	Actual 2014	Actual 2015	Actual 2016	Draft Actual 2017	Board-Approved 2013 (5)	Actual 2013 (6)	Actual 2014 (7)	Actual 2015 (8)	Actual 2016 (9)	Draft Actual 2017 (10)
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)	(r)
	Revenue																		
1	C1 Off-Peak Storage	-	-	-	-	-	-	500	389	241	603	2,749	709	500	389	241	603	2,749	709
2	Supplemental Balancing Services	-	-	-	-	-	-	2,000	1,481	752	1,001	1,367	890	2,000	1,481	752	1,001	1,367	890
3	Gas Loans	-	-	-	-	-	-	-	56	54	38	19	15	-	56	54	38	19	15
4	Enbridge LBA	-	-	-	-	-	-	-	360	237	282	968	381	-	360	237	282	968	381
5		-	-	-	-	-	-	2,500	2,286	1,283	1,925	5,102	1,995	2,500	2,286	1,283	1,925	5,102	1,995
6	C1 ST Firm Peak Storage	7,883	4,747	3,235	4,935	5,627	4,618	-	-	-	-	-	-	7,883	4,747	3,235	4,935	5,627	4,618
7	Total Revenue (1)	7,883	4,747	3,235	4,935	5,627	4,618	2,500	2,286	1,283	1,925	5,102	1,995	10,383	7,033	4,518	6,860	10,729	6,613
	Costs																		
8	O&M (2)	3,810	2,910	2,161	1,684	2,156	2,289	-	-	-	-	-	-	3,810	2,910	2,161	1,684	2,156	2,289
9	UFG (3)	316	229	92	39	121	90	-	486	409	239	392	172	316	715	500	278	514	262
10	Compressor Fuel (4)	1,201	79	78	56	125	110	-	167	350	349	405	210	1,201	246	428	405	530	320
11	Total Costs	5,327	3,218	2,331	1,779	2,402	2,489	-	653	758	588	797	381	5,327	3,871	3,089	2,367	3,199	2,870
12	Net Revenue (line 7 - 11)	2,556	1,529	904	3,156	3,225	2,129	2,500	1,633	525	1,337	4,305	1,614	5,056	3,162	1,429	4,493	7,530	3,743
13	Less Shareholder Portion (10%)	255	153	90	316	322	213	250	163	53	134	431	161	505	316	143	449	753	374
14	Ratepayer Portion	2,301	1,377	814	2,840	2,902	1,915	2,250	1,469	473	1,203	3,875	1,452	4,551	2,846	1,286	4,043	6,777	3,368
15	Approved in Rates	2,301	2,301	2,301	2,301	2,301	2,301	2,250	2,250	2,250	2,250	2,250	2,250	4,551	4,551	4,551	4,551	4,551	4,551
16	Deferral balance payable to/ (collectable from) ratepayers	-	(924)	(1,487)	539	601	(386)	-	(781)	(1,777)	(1,047)	1,625	(798)	-	(1,705)	(3,265)	(508)	2,226	(1,183)

Notes:
(1) Based on short-term storage services provided.
(2) 2013 O&M revenue requirement based on 11.3 PJ's of Board-approved excess in-franchise storage capacity.
(3) Total based on short-term storage volumes in proportion to total volumes. Short-Term Firm Peak Storage based on short-term peak storage activity compared to overall short-term storage activity.
(4) Total based on short-term storage activity in proportion to total actual storage activity. Short-Term Firm Peak Storage based on short-term peak storage activity compared to overall short-term storage activity.
(5) EB-2013-0210, Rate Order, Working Papers, Schedule 40, lines 14 - 17.
(6) EB-2014-0145, Exhibit A, Tab 1, Appendix A, Schedule 6.
(7) EB-2015-0010, Exhibit A, Tab 1, Appendix A, Schedule 3.
(8) EB-2016-0118, Exhibit A, Tab 1, Appendix A, Schedule 3.
(9) EB-2017-0091, Exhibit A, Tab 1, Appendix A, Schedule 3.
(10) Actual 2017 deferral balance is expected to be included in the Application and Evidence for EB-2018-0105, but is draft at this time and may change.

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Ms. Zelond
To Mr. Quinn

REF: Tr.3 p.11.

To provide detail supporting the change in transfer payments

Response:

The table below details the net costs/savings the utilities have received as a result of the Enbridge Inc. and Spectra merger. As indicated at Tr.3 p.11, the amounts are not considered material. Also on Tr.3, p.11, these costs and savings were characterized as transfer payments, and they are not.

JT 3.1 Union/EGD Corporate Cost Savings (in Millions)

	Union 2017			EGD 2017		
	Costs to Achieve	**Savings**	**Net Total**	**Costs to Achieve**	**Savings**	**Net Total**
Functional Area						
Finance/Regulatory	(0.2)	-	(0.2)	(0.9)	0.2	(0.7)
Facilities	(0.1)	-	(0.1)	-	0.6	0.6
HR	(1.0)	0.7	(0.3)	(0.6)	(0.6)	(1.2)
IT	(3.5)	1.5	(2.0)	(1.6)	1.2	(0.4)
Legal	(0.3)	-	(0.3)	-	0.1	0.1
SCM	(0.3)	0.3	-	-	(0.1)	(0.1)
Other	(0.7)	1.3	0.6	-	(0.1)	(0.1)
Total (Costs)/Savings	(6.1)	3.8	(2.3)	(3.1)	1.4	(1.7)

Notes

Costs to achieve include:

1. Unbudgeted expenses such as legal transaction costs and travel
2. Employee related costs such as severance, relocation and retention expenses
3. Included in the costs to achieve are severance costs of $4.7M for Union, and $3.1M for EGD
4. Credit in savings for EGD are a result of reorganizations, certain costs/savings regrouped between departments

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Redford
To Mr. Shepherd

REF: Tr.3 p.22.

To include all the storage or transportation assets in which Enbridge or Spectra have an interest that could be used to serve Ontario.

Response:

In addition to the assets listed in the response to SEC Interrogatory #23 and #24 found at Exhibit C.SEC.23 and Exhibit C.SEC.24, the following assets owned by Enbridge/Spectra could be used to serve the Ontario market.

Name of Pipeline or Storage Asset	Ownership Interest	Location	Design Capacity (PJ) and/or Deliverability (PJ/Day)
Alliance Pipeline Limited Partnership Canada	Enbridge Income Fund (50%)	Highway 2 B.C to Alameda, Saskatchewan	1.7
Alliance Pipeline Limited Partnership U.S.	Enbridge Income Fund (50%)	Alameda, Saskatchewan To ACE Hub, Chicago Illinois	1.7
Vector Pipeline U.S.	Enbridge – 60%	Joliet, Illinois to St. Clair (International Border)	1.7
Nexus Gas Transmission, LLC (Nexus)	Enbridge, through its ownership of Spectra Energy (50%)	Kensington, Ohio to Dawn, Ontario	1.6
Texas Eastern Transmission L.P	Enbridge, through its ownership of Spectra Energy (100%)	Texas Eastern Market Zone 2, Clarington, Ohio	11.6
Texas Eastern Appalachian Lease Project	Texas Eastern Transmission L.P. (100%)	Clarington, Ohio to Kensington Ohio	0.9
Lebanon Lateral	Texas Eastern Transmission L.P. (50%)	Lebanon, Ohio	0.3

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Kitchen
To Mr. Quinn

REF: Tr.3 p.37.

To make best efforts to look at continuity schedules provided in 2014 and to consider updating for year end 2017

Response:

Please see Attachments 1, 2, and 3 for the continuity schedules provided in the 2014, 2015, and 2016 Deferral and Earning Sharing proceedings. Please see Attachment 4 for the 2017 continuity schedules, which have not yet been filed and are subject to finalization.

UNION GAS LIMITED
Continuity of Property, Plant and Equipment
Calendar Year Ending December 31, 2014

Line No.	Particulars ($000's)	Balance Dec. 31/13 (a)	Capital Additions (b)	Transfers (c)	Retirements (d)	Balance Dec. 31/14 (e)
	Unregulated Gas Plant in Service:					
	Underground storage plant:					
1	Land	$ 2,009	87			$ 2,096
2	Land rights	21,667				21,667
3	Structures and improvements	20,491	700	426	(21)	21,596
4	Wells and lines	91,772	464	3	(58)	92,181
5	Compressor equipment	147,524	4,936	2,843	(1,492)	153,811
6	Measuring & regulating equipment	22,294	183	3	(40)	22,440
7	Base pressure gas	22,928				22,928
8	Other equipment	-				-
9		$ 328,685	6,370	3,275	(1,611)	$ 336,719
	General plant:					
10	Land	$ 17				$ 17
11	Structures & improvements	1,535	34		(3)	1,566
12	Office furniture & equipment	378	18		(2)	394
13	Office equipment - computers	6,524	732		(539)	6,717
14	Transportation equipment	2,271	305		(225)	2,351
15	Heavy work equipment	664	47		(37)	674
16	Tools & work equipment	992	163		(47)	1,108
17	Communication equipment	438	30		(1)	467
18	Other general equipment	-				-
19		$ 12,819	1,329	-	(854)	$ 13,294
20	Total gas plant in service	$ 341,504	7,699	3,275	(2,465)	$ 350,013
21	Gas plant under construction	10,533	1,342			11,875
22	Total unregulated property plant and equipment	$ 352,037	9,041	3,275	(2,465)	$ 361,888

UNION GAS LIMITED
Continuity of Accumulated Depreciation
Calendar Year Ending December 31, 2014

Line No.	Particulars ($000's)	Balance Dec. 31/13 (a)	Transfers (b)	Provisions (c)	Retirements (d)	Net Salvage /(Costs) (e)	Balance Dec. 31/14 (f)
	Unregulated Gas Plant in Service:						
	Underground storage plant:						
1	Land rights	$ 7,540		431			$ 7,971
2	Structures & improvements	7,571	233	633	(6)		8,431
3	Wells and lines	25,889	2	1,948	(10)		27,829
4	Compressor equipment	40,457	1,431	4,497	(800)		45,585
5	Measuring & regulating equipment	9,625	2	502	(15)		10,114
6		$ 91,082	1,668	8,011	(831)	-	$ 99,930
	General plant:						
7	Structures & improvements	393		68	(3)		458
8	Office furniture & equipment	176		32	(2)		206
9	Office equipment - computers	3,040		1,725	(539)		4,226
10	Transportation equipment	801		260	(226)	17	852
11	Heavy work equipment	65		39	(37)		67
12	Tools and other equipment	523		88	(46)		565
13	Communication equipment	245		39	(1)		283
14		$ 5,243	-	2,251	(854)	17	$ 6,657
15	Total unregulated gas plant in service	$ 96,325	1,668	10,262	(1,685)	17	$ 106,587

UNION GAS LIMITED
Provision for Depreciation,
Amortization and Depletion
Calendar Year Ending December 31, 2014

Line No.	Particulars ($000's)	UNREGULATED
1	Total unregulated provision for depreciation and amortization before adjustments (per page 2)	10,262
	Adjustments:	
2	Vehicle depreciation through clearing	(34)
3	Asset Retirement Obligation expense for Unregulated storage wells	44
4	Unregulated provision for depreciation amortization and depletion	**10,272**

UNION GAS LIMITED
Provision for Depreciation,
Amortization and Depletion
Calendar Year Ending December 31, 2014

Line No.	Particulars ($000's)	Average Plant (1) (a)	Rate (%) (b)	Total Provision
	Storage:			
1	Land rights	$ 21,667	Allocation	$ 431
2	Structures and improvements	19,456	Allocation	633
3	Wells and lines	89,272	Allocation	1,948
4	Compressor equipment	149,545	Allocation	4,497
5	Measuring & regulating equipment	20,602	Allocation	502
6	Other equipment			
7		$ 300,543		$ 8,011
	General:			
8	Structures & improvements	$ 1,551	Allocation	$ 68
9	Office furniture and equipment	386	Allocation	32
10	Office equipment - computers	6,620	Allocation	1,725
11	Transportation equipment	2,311	Allocation	260
12	Heavy work equipment	669	Allocation	39
13	Tools and other equipment	1,050	Allocation	88
14	Communications equipment	453	Allocation	39
15	Other equipment	-		
16		$ 13,040		$ 2,251
17	Sub-total	313,583		10,262
18	Total unregulated provision for depreciation and amortization before adjustments			$ 10,262
19	Vehicle depreciation through clearing			(34)
20	Asset Retirement Obligation expense for Unregulated storage wells			44
21	Unregulated provision for depreciation amortization and depletion	313,583		$ **10,272**

Notes:

(1) Average of the opening and closing plant balances (excluding fully depreciated assets) was used to calculate the annual depreciation provision.

UNION GAS LIMITED
Continuity of Property, Plant and Equipment
Calendar Year Ending December 31, 2015

Line No.	Particulars ($000's)	Balance Dec. 31/14 (a)	Capital Additions (b)	Transfers (c)	Retirements (d)	Balance Dec. 31/15 (e)
	Unregulated Gas Plant in Service:					
	Underground storage plant:					
1	Land	$ 2,096		33		$ 2,129
2	Land rights	21,667		8,263		29,930
3	Structures and improvements	21,596	192	3,888	(1)	25,675
4	Wells and lines	92,181	8,627	17,583	(1)	118,390
5	Compressor equipment	153,811	187	8,828		162,826
6	Measuring & regulating equipment	22,440	29	1,899		24,368
7	Base pressure gas	22,928	339	4,435		27,702
8	Other equipment	-				-
9		$ 336,719	9,374	44,930	(2)	$ 391,021
	General plant:					
10	Land	$ 17				$ 17
11	Structures & improvements	1,566	655		(181)	2,041
12	Office furniture & equipment	394	72		(55)	411
13	Office equipment - computers	6,717	940		(637)	7,020
14	Transportation equipment	2,351	123	(1)	(119)	2,355
15	Heavy work equipment	674	27	0	(32)	669
16	Tools & work equipment	1,108	124	0	(93)	1,139
17	Communication equipment	467	96		(16)	547
18	Other general equipment	-				-
19		$ 13,294	2,038	-	(1,133)	$ 14,199
20	Total gas plant in service	$ 350,013	11,412	44,930	(1,135)	$ 405,220
21	Gas plant under construction	11,875	(3,167)			8,708
22	Total unregulated property plant and equipment	$ 361,888	8,245	44,930	(1,135)	$ 413,928

UNION GAS LIMITED
Continuity of Accumulated Depreciation
Calendar Year Ending December 31, 2015

Line No.	Particulars ($000's)	Balance Dec. 31/14 (a)	Transfers (b)	Provisions (c)	Retirements (d)	Net Salvage /(Costs) (e)	Balance Dec. 31/15 (f)
	Unregulated Gas Plant in Service:						
	Underground storage plant:						
1	Land rights	$ 7,971	796	562			$ 9,328
2	Structures & improvements	8,431	852	728	(0)		10,011
3	Wells and lines	27,829	3,161	2,236	(1)		33,224
4	Compressor equipment	45,585	1,889	5,249	-		52,723
5	Measuring & regulating equipment	10,114	1,213	515	-		11,842
6		$ 99,930	7,910	9,289	(1)	-	$ 117,128
	General plant:						
7	Structures & improvements	458		79	(181)		356
8	Office furniture & equipment	206		32	(55)		183
9	Office equipment - computers	4,226		1,686	(637)		5,275
10	Transportation equipment	852	(0)	254	(119)	10	996
11	Heavy work equipment	67	0	37	(32)		73
12	Tools and other equipment	565	0	90	(93)		562
13	Communication equipment	283		42	(16)		309
14		$ 6,657	(0)	2,220	(1,133)	10	$ 7,754
15	Total unregulated gas plant in service	$ 106,587	7,910	11,509	(1,134)	10	$ 124,882

UNION GAS LIMITED
Provision for Depreciation,
Amortization and Depletion
Calendar Year Ending December 31, 2015

Line No.	Particulars ($000's)	UNREGULATED
1	Total unregulated provision for depreciation and amortization before adjustments (per page 3)	11,509
	Adjustments:	
2	Vehicle depreciation through clearing	(19)
3	Asset Retirement Obligation expense for Unregulated storage wells	86
4	Unregulated provision for depreciation amortization and depletion	**11,577**

UNION GAS LIMITED
Provision for Depreciation,
Amortization and Depletion
Calendar Year Ending December 31, 2015

Line No.	Particulars ($000's)	Average Plant (1) (a)	Rate (%) (b)	Total Provision
	Storage:			
1	Land rights	$ 25,799	Allocatioı	$ 562
2	Structures and improvements	22,049	Allocation	728
3	Wells and lines	102,580	Allocation	2,236
4	Compressor equipment	157,196	Allocation	5,249
5	Measuring & regulating equipment	21,640	Allocation	515
6	Other equipment			
7		$ 329,263		$ 9,289
	General:			
8	Structures & improvements	$ 1,804	Allocatioı	$ 79
9	Office furniture and equipment	403	Allocation	32
10	Office equipment - computers	6,869	Allocation	1,686
11	Transportation equipment	2,353	Allocation	254
12	Heavy work equipment	672	Allocation	37
13	Tools and other equipment	1,124	Allocation	90
14	Communications equipment	507	Allocation	42
15	Other equipment	-		
16		$ 13,730		$ 2,220
17	Sub-total	342,994		11,509
18	Total unregulated provision for depreciation and amortization before adjustments			$ 11,509
19	Vehicle depreciation through clearing			(19)
20	Asset Retirement Obligation expense for Unregulated storage wells			86
21	Unregulated provision for depreciation amortization and depletion	342,994		$ **11,577**

Notes:
(1) Average of the opening and closing plant balances (excluding fully depreciated assets) was used to calculate the annual depreciation provision.

UNION GAS LIMITED
Continuity of Property, Plant and Equipment
Calendar Year Ending December 31, 2016

Line No.	Particulars ($000's)	Balance Dec. 31/15 (a)	Capital Additions (b)	Transfers (c)	Retirements (d)	Balance Dec. 31/16 (e)
	Unregulated Gas Plant in Service:					
	Underground storage plant:					
1	Land	$ 2,129	28	-	-	$ 2,156
2	Land rights	29,930	-	-	-	29,930
3	Structures and improvements	25,675	61	(2)	-	25,733
4	Wells and lines	118,390	1,092	49	(515)	119,016
5	Compressor equipment	162,826	589	297	(0)	163,711
6	Measuring & regulating equipment	24,368	588	15	-	24,971
7	Base pressure gas	27,702	1,778	-	-	29,481
8	Other equipment	-	-	-	-	-
9		$ 391,021	4,135	358	(515)	$ 394,999
	General plant:					
10	Land	$ 17	-	-	-	$ 17
11	Structures & improvements	2,041	25	-	(7)	2,058
12	Office furniture & equipment	411	0	-	(45)	367
13	Office equipment - computers	7,020	551	-	(4,421)	3,150
14	Transportation equipment	2,355	117	0	(107)	2,365
15	Heavy work equipment	669	2	(0)	(13)	658
16	Tools & work equipment	1,139	133	-	(75)	1,197
17	Communication equipment	547	15	-	(102)	460
18	Other general equipment	-	-	-	-	-
19		$ 14,199	844	-	(4,771)	$ 10,271
20	Total gas plant in service	$ 405,220	4,979	358	(5,287)	$ 405,270
21	Gas plant under construction	8,708	5,701			14,409
22	Total unregulated property plant and equipment	$ 413,928	10,680	358	(5,287)	$ 419,679

UNION GAS LIMITED
Continuity of Accumulated Depreciation
Calendar Year Ending December 31, 2016

Line No.	Particulars ($000's)	Balance Dec. 31/15 (a)	Transfers (b)	Provisions (c)	Retirements (d)	Net Salvage /(Costs) (e)	Balance Dec. 31/16 (f)
	Unregulated Gas Plant in Service:						
	Underground storage plant:						
1	Land rights	$ 9,328	-	613	-	-	$ 9,941
2	Structures & improvements	10,011	(2)	775	-	-	10,783
3	Wells and lines	33,224	41	2,493	(309)	-	35,450
4	Compressor equipment	52,723	164	4,420	(0)	-	57,307
5	Measuring & regulating equipment	11,842	16	519	-	-	12,377
6		$ 117,128	218	8,820	(309)	-	$ 125,858
	General plant:						
7	Structures & improvements	356	-	94	(7)	-	442
8	Office furniture & equipment	183	-	33	(45)	-	171
9	Office equipment - computers	5,275		1,211	(4,421)	-	2,065
10	Transportation equipment	996	0	326	(107)	11	1,226
11	Heavy work equipment	73	(0)	47	(13)	-	106
12	Tools and other equipment	562	-	83	(75)	-	570
13	Communication equipment	309	-	45	(102)	-	252
14		$ 7,754	-	1,837	(4,770)	11	$ 4,831
15	Total unregulated gas plant in service	$ 124,882	218	10,657	(5,079)	11	$ 130,689

UNION GAS LIMITED
Provision for Depreciation,
Amortization and Depletion
Calendar Year Ending December 31, 2016

Line No.	Particulars ($000's)	UNREGULATED
1	Total unregulated provision for depreciation and amortization before adjustments (per page 2)	10,657
	Adjustments:	
2	Vehicle depreciation through clearing	(17)
3	Asset Retirement Obligation expense for Unregulated storage wells	39
4	Unregulated provision for depreciation amortization and depletion	**10,679**

UNION GAS LIMITED
Provision for Depreciation,
Amortization and Depletion
Calendar Year Ending December 31, 2016

Line No.	Particulars ($000's)	Average Plant (1) (a)	Rate (%) (b)	Total Provision
	Storage:			
1	Land rights	$ 29,930	Allocation	$ 613
2	Structures and improvements	24,083	Allocation	775
3	Wells and lines	116,083	Allocation	2,493
4	Compressor equipment	159,252	Allocation	4,420
5	Measuring & regulating equipment	22,773	Allocation	519
6	Other equipment	-		
7		$ 352,120		$ 8,820
	General:			
8	Structures & improvements	$ 2,050	Allocation	$ 94
9	Office furniture and equipment	389	Allocation	33
10	Office equipment - computers	5,085	Allocation	1,211
11	Transportation equipment	2,360	Allocation	326
12	Heavy work equipment	664	Allocation	47
13	Tools and other equipment	1,169	Allocation	83
14	Communications equipment	503	Allocation	45
15	Other equipment	-		
16		$ 12,219		$ 1,837
17	Sub-total	364,340		10,657
18	Total unregulated provision for depreciation and amortization before adjustments			$ 10,657
19	Vehicle depreciation through clearing			(17)
20	Asset Retirement Obligation expense for Unregulated storage wells			39
21	Unregulated provision for depreciation amortization and depletion	364,340		$ **10,679**

Notes:

(1) Average of the opening and closing plant balances (excluding fully depreciated assets) was used to calculate the annual depreciation provision.

UNION GAS LIMITED
Draft Continuity of Property, Plant and Equipment
Calendar Year Ending December 31, 2017

Line No.	Particulars ($000's)	Balance Dec. 31/16 (a)	Capital Additions (b)	Transfers (c)	Retirements (d)	Balance Dec. 31/17 (e)
	Unregulated Gas Plant in Service:					
	Underground storage plant:					
1	Land	$ 2,156	23	-	-	$ 2,179
2	Land rights	29,930	-	-	-	29,930
3	Structures and improvements	25,733	185	5	-	25,924
4	Wells and lines	119,016	15,282	427	(16)	134,709
5	Compressor equipment	163,711	1,424	43	-	165,177
6	Measuring & regulating equipment	24,971	5,058	295	-	30,324
7	Base pressure gas	29,481	734	-	-	30,214
8	Other equipment	-	-	-	-	-
9		$ 394,999	22,705	769	(16)	$ 418,457
	General plant:					
10	Land	$ 17	-	-	-	$ 17
11	Structures & improvements	2,058	43	-	(16)	2,085
12	Office furniture & equipment	367	13	-	(11)	369
13	Office equipment - computers	3,150	1,836	-	(481)	4,505
14	Transportation equipment	2,365	204	-	(134)	2,434
15	Heavy work equipment	658	18	4	(15)	664
16	Tools & work equipment	1,197	128	(4)	(72)	1,250
17	Communication equipment	460	31	-	(10)	481
18	Other general equipment	-	-	-	-	-
19		$ 10,271	2,274	-	(740)	$ 11,805
20	Total gas plant in service	$ 405,270	24,979	769	(756)	$ 430,262
21	Gas plant under construction	14,409	(3,981)	-	-	10,428
22	Total unregulated property plant and equipment	$ 419,679	20,999	769	(756)	$ 440,690

UNION GAS LIMITED
Draft Continuity of Property, Plant and Equipment
Calendar Year Ending December 31, 2017

Line No.	Particulars ($000's)	Balance Dec. 31/16 (a)	Transfers (b)	Provisions (c)	Retirements (d)	Net Salvage /(Costs) (e)	Balance Dec. 31/17 (f)
	Unregulated Gas Plant in Service:						
	Underground storage plant:						
1	Land rights	$ 9,941	-	603	-	-	$ 10,544
2	Structures & improvements	10,783	5	763	-	-	11,551
3	Wells and lines	35,449	278	2,605	(8)	-	38,324
4	Compressor equipment	57,307	10	4,371	-	-	61,689
5	Measuring & regulating equipment	12,377	167	577	-	-	13,121
6		$ 125,858	460	8,919	(8)	-	$ 135,230
	General plant:						
7	Structures & improvements	442	-	61	(16)	-	487
8	Office furniture & equipment	171	-	27	(11)	-	187
9	Office equipment - computers	2,065	-	761	(481)	-	2,345
10	Transportation equipment	1,226	0	262	(134)	11	1,365
11	Heavy work equipment	106	2	36	(15)	-	129
12	Tools and other equipment	570	(2)	91	(72)	-	587
13	Communication equipment	252	-	36	(10)	-	278
14		$ 4,831	0	1,275	(740)	11	$ 5,377
15	Total unregulated gas plant in service	$ 130,689	460	10,194	(748)	11	$ 140,606

UNION GAS LIMITED
Draft Provision for Depreciation,
Amortization and Depletion
Calendar Year Ending December 31, 2017

Line No.	Particulars ($000's)	UNREGULATED
1	Total unregulated provision for depreciation and amortization before adjustments (per page 2)	10,194
	Adjustments:	
2	Vehicle depreciation through clearing	(51)
3	Asset Retirement Obligation expense for Unregulated storage wells	93
4	Unregulated provision for depreciation amortization and depletion	**10,236**

UNION GAS LIMITED
Draft Provision for Depreciation,
Amortization and Depletion
Calendar Year Ending December 31, 2017

Line No.	Particulars ($000's)	Average Plant (1) (a)	Rate (%) (b)	Total Provision
	Storage:			
1	Land rights	$ 29,930	Allocation	$ 603
2	Structures and improvements	24,144	Allocation	763
3	Wells and lines	123,949	Allocation	2,605
4	Compressor equipment	155,904	Allocation	4,371
5	Measuring & regulating equipment	25,567	Allocation	577
6	Other equipment			
7		$ 359,495		$ 8,919
	General:			
8	Structures & improvements	$ 2,072	Allocation	$ 61
9	Office furniture and equipment	368	Allocation	27
10	Office equipment - computers	3,827	Allocation	761
11	Transportation equipment	2,399	Allocation	262
12	Heavy work equipment	661	Allocation	36
13	Tools and other equipment	1,224	Allocation	91
14	Communications equipment	471	Allocation	36
15	Other equipment	-		
16		$ 11,022		$ 1,275
17	Sub-total	370,517		10,194
18	Total unregulated provision for depreciation and amortization before adjustments			$ 10,194
19	Vehicle depreciation through clearing			(51)
20	Asset Retirement Obligation expense for Unregulated storage wells			93
21	Unregulated provision for depreciation amortization and depletion	370,517		$ **10,236**

Notes:

(1) Average of the opening and closing plant balances (excluding fully depreciated assets) was used to calculate the annual depreciation provision.

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Kitchen
To Mr. Quinn

REF: Tr.3 p.62.

Using Rate 10 and Rate 6, to distinguish and do a calculation of how costs are currently going to rates with respect of utilities.

Response:

Dawn-Parkway demand costs are allocated between Union North, Union South and ex-franchise (Rate M12/C1) based on distance weighted Dawn-Parkway design day demands.

Union North - Rate 10 Allocation

The allocation of Union North Dawn-Parkway demand costs to Rate 10 ranges between 17% to 24% as provided in Table 1, line 2.

In the 2013 Board-approved Cost Allocation Study, Union allocated the Union North Dawn-Parkway demand costs to Union North rate classes in proportion to the excess of peak day demands over the average day demands. This allocation methodology recognizes that Union used the Dawn-Parkway System to transport gas to and from storage to serve Union North sales service and bundled direct purchase customers.

Subsequent to 2013 as part of the Dawn Reference Price proceeding (EB-2015-0181), Union updated the allocation of Union North Dawn-Parkway demand costs to recognize that the Dawn-Parkway system was being used for Union North storage and transportation requirements. The allocation of storage-related Dawn-Parkway demand costs was split, using the 2013 Board-approved methodology, to recognize the Union North West and Union North East Zones. The percent allocation by rate class of the storage-related Dawn-Parkway demand costs by Zone is provided in Table 1, column (a) and column (b). The transportation-related Dawn-Parkway demand costs were allocated to Union North East Zone rate classes in proportion to a combination of average day demands and excess of peak day demands over average day demands, which is consistent with Board-approved cost allocation methodology for Union North firm upstream transportation costs. The percent allocation by rate class of the transportation-related Dawn-Parkway demand costs to serve the Union North East Zone is provided in Table 1, column (c).

Dawn-Parkway demand costs are recovered in storage and transportation rates from Union North sales service, bundled direct purchase and bundled storage customers.

Table 1
Union North Dawn-Parkway Demand Cost Allocation

Line No.	Rate Class	Union North West Zone Storage	Union North East Zone Storage	Union North East Zone Transportation
		(a)	(b)	(c)
1	Rate 01	77%	74%	67%
2	Rate 10	17%	20%	24%
3	Rate 20	6%	5%	7%
4	Rate 100	-	1%	-
5	Rate 25	-	-	2%
6	Total	100%	100%	100%

EGD - Rate 6 Allocation

Approximately 96% of M12 costs that EGD incurs under its M12 contracts are load balancing and storage related (i.e. storage withdrawals and injections) and are allocated between deliverability and space on a 60/40 basis.

The deliverability portion of load balancing and storage related M12 costs is allocated to each rate class based on the deliverability allocation factor, which represents peak day demand over average winter day demand for each customer class (EB-2017-0086, Exhibit G2, Tab 6, Schedule 3, Page 2 of 2, Item 3.1).

The space portion of load balancing and storage related M12 costs is allocated to each rate class based on the space allocation factor, which represents average winter day demand over the average day demand (EB-2017-0086, Exhibit G2, Tab 6, Schedule 3, Page 2 of 2, Item 3.2).

Enbridge provides load balancing and storage service to all of its customers, except to its unbundled customers. Accordingly, these costs are recovered from all Enbridge’s customers, except Rate 125, Rate 300 and Rate 332 (i.e. unbundled) customers.

Approximately 4% of M12 costs that EGD incurs under its M12 contracts are transportation related and are allocated to EGD bundled transportation customers based on bundled transportation volumes (EB-2017-0086, Exhibit G2, Tab 6, Schedule 3, Page 2 or 2, Item 1.6). Note that these costs are recovered only from customers who receive transportation service from EGD.

Specific allocation to Rate 6 customers can be seen at the above referenced exhibits.

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Redford
To Mr. Quinn

REF: Tr.3 p.96.

To take a look and "see whether we've actually ever had that case before, even with Union's capacity", and if not, what would be Union's response to that, with two requests, one from Enbridge for 100 units, one from an ex-franchise customer for 100 units, and you only have 150 operation available units at that the inter-day window.

Response:

As discussed with Mr. Redford at Tr. 3, pp. 89 to 96, forecast in-franchise requirements are identified and included in the calculation of Operationally Available Transport Capacity shown on the Union web-site (Informational Postings) at each standard NAESB nomination window. In-franchise requirements are considered firm all-day.

M12 and C1 transportation customers are entitled to nominate their firm transportation quantities under their firm transportation contracts at the Timely window. Adjustments to those quantities can be made on an interruptible basis at intraday nomination windows as provided in the contracts. All scheduled quantities are recorded in the CARE nomination system. This will not change for other existing M12 and C1 shippers with EGD zone operating as an in-franchise customer.

In-franchise requirements are entered directly into the CARE system and are considered a proxy for nominations. Adjustments are made within the CARE system throughout the gas day based on in-franchise demand. The Operationally Available Transport Capacity is calculated within the CARE system at each standard NAESB nomination window based on scheduled in-franchise requirements, firm quantities and interruptible quantities.

In the past Union has not had to allocate intraday capacity on the Dawn Parkway System between in-franchise and ex-franchise customers and sees this as an improbable scenario. In the event sufficient capacity was not available to meet all firm and interruptible demands on an intraday window, any firm incremental in-franchise demands would be scheduled first. Any remaining capacity would be allocated to interruptible nominations.

In the simple example discussed at Tr. 3, p. 96, if 150 units of capacity was available on the Dawn Parkway System on an intraday window[1] and in-franchise customers and ex-franchise customers each required an additional 100 units of capacity (above the previous window), in-

[1] In practice, the example does not fully describe the allocation process at an intraday window. The amount of available capacity for interruptible customers is calculated based on all firm demands, which would already include any revised in-franchise demands.

franchise customers would be allocated 100 units of capacity and ex-franchise customers would be allocated 50 units of capacity.

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Kitchen
To Mr. Shepherd

REF: Tr.3 p.113.

To pull the variance explanations and provide them.

Response:

From 2013 through 2017, the primary drivers of Union's earnings above Board-approved ROE were lower interest expenses as a result of the refinancing of long term debt, lower pension expense and colder than normal weather in the early years of the IRM. Small productivity gains throughout the period also helped contribute to earnings. These drivers enabled the utility to invest in both growth and maintenance, and to manage increasing cost pressures.

Inflationary cost pressures that the utility has had to manage beyond the annual GDP IPI FDD less 60% productivity factor include: salary and wage increases above the price cap, higher postage and facilities costs (specifically hydro), and increased operating and maintenance costs, including depreciation expense.

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Kitchen
To Mr. Shepherd

REF: Tr.3 p.129.

To explain the details of the ICM recovery figures.

Response:

Community expansion capex is incremental to the core growth of approximately 50,000 customers per year. This capital has been included above the ICM materiality threshold. In Table 17, the 2019 "ICM capital" used to calculate the total revenue requirement includes $20 million of capital related to incremental community expansion projects. The Cost of Capital and Cost of Service sections of Table 17 include costs associated with a total of $49 million of community expansion capital investment ($29 million opening rate base at the start of 2019 plus $20 million additional capital invested in 2019)

As per Board's ICM policy, ICM cost recovery must be netted from incremental revenues associated with the capital spend to avoid double counting. The adjustment to remove "Incremental revenues from community expansions" ensures that this double counting is eliminated.

Estimated 2021 Community expansion costs and revenues:

Estimated 2021 Revenue Requirement:

Rate Base	$49 million
Required rate of return	6.31%
Cost of Capital	$3 million
Depreciation and amortization	$1 million
Total Revenue Requirement	$4 million

This approximate total amount is included in the Total Revenue Requirement line in Table 17.

Estimated 2021 Incremental Revenue from Community Expansion

Community expansion revenues include both the base distribution revenue and the SES surcharge revenue. These revenues are included in the line "*Incremental revenues from community expansions*" as a reduction to the "Total Revenue Requirement".

Delivery Revenues	$1 million
SES Surcharge Revenues	$2 million
Total Incremental Revenues	$3 million

The difference between the Total Revenue Requirement and the Incremental Revenue is the deficiency, in this illustrative example, approximately $1 million per year. This residual amount is included in the "Revenue Requirement (Net)" that is used to adjust rates through the ICM-mechanism.

Table 17 from Exhibit C.FRPO 11 a) has been copied below for ease of reference.

Table 17

(iii) UG ICM Revenue Requirement

$ Millions	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**	**2026**	**2027**	**2028**
ICM capital	211	77	114	96	264	249	76	58	88	31
Cost of Capital										
Rate base	151	338	415	509	631	865	1,040	1,071	1,101	1,127
Required rate of return	6.09%	6.25%	6.31%	6.34%	6.36%	6.39%	6.40%	6.41%	6.42%	6.43%
	9	21	26	32	40	55	67	69	71	72
Cost of Service										
Operation and maintenance	-	-	-	-	-	-	-	-	-	-
Depreciation and amortization	6	11	14	17	22	30	35	37	39	41
	6	11	14	17	22	30	35	37	39	41
Income Taxes	(2)	(2)	(2)	(2)	(4)	(6)	(5)	(3)	(1)	1
Total Revenue Requirement	**13**	**30**	**38**	**47**	**58**	**80**	**97**	**103**	**109**	**115**
Incremental revenues from community expansions	(2)	(3)	(3)	(3)	(3)	(3)	(3)	(3)	(3)	(3)
Revenue Requirement (Net)	**12**	**27**	**35**	**44**	**55**	**76**	**94**	**100**	**106**	**111**

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Kitchen
To Mr. Shepherd

REF: Tr.3 p.140.

To break down the ICM eligible line between maintenance and attachments.

Response:

Please see Attachment 1.

Table 1 – Breakdown of ICM-eligible Projects (1) by Type

	ICM eligible projects (in $ millions)	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	Sum
1	Union Gas - Growth/Attachments	145	28	45	12	116	131	12	10	22	6	*527*
2	Union Gas - Maintenance	66	49	69	84	148	118	64	48	66	25	*737*
3	**Total Union Gas ICM Eligible Projects**	**211**	**77**	**114**	**96**	**264**	**249**	**76**	**58**	**88**	**31**	*1,264*
4												
5	Enbridge Gas Distribution - Growth/Attachments	-	-	-	-	-	-	-	-	-	-	-
6	Enbridge Gas Distribution - Maintenance	111	217	70	123	62	68	89	296	67	70	*1,173*
7	**Total Enbridge Gas Distribution ICM Eligible Projects**	**111**	**217**	**70**	**123**	**62**	**68**	**89**	**296**	**67**	**70**	*1,173*
8												
9	**Total ICM Eligible Growth/Attachments**	**145**	**28**	**45**	**12**	**116**	**131**	**12**	**10**	**22**	**6**	*527*
10	**Total ICM Eligible Maintenance**	**177**	**266**	**139**	**207**	**210**	**186**	**153**	**344**	**133**	**95**	*1,910*
11	*"ICM Eligible Projects" included in Exhibit C.FRPO.1 Attachment 1, slide 22, excluded from Rate Recovery (2)*	*1*	*14*	*2*	*5*	*6*	*-*	*6*	*18*	*-*	*51*	*103*
12	**Total**	**323**	**308**	**186**	**224**	**332**	**317**	**171**	**372**	**155**	**152**	*2,540*
13												
14	*Enbridge Gas Distribution - Maintenance, "ICM Eligible Projects" falling beneath ICM*											
15	*Threshold*	*-*	*14*	*39*	*33*	*13*	*89*	*96*	*132*	*141*	*138*	*695*

Notes:

(1) The ICM amounts in the Board presentation were based on the assumption that the identified amounts are eligible for ICM. The Asset Management Plans will be updated on an annual basis and the portfolio would be prioritized and optimized to the approved budget. Should there be risks and opportunities that exceed the materiality threshold, investments will be reviewed in relation to the approved ICM criteria.

(2) An amount of unidentified capital was included in the 10 year capital plan, but excluded from forecasted ICM rate recovery. These represent potential capital spend that may or may not qualify for ICM cost recovery (please see Transcript April 3, 2018, page 158 for discussion on these amounts).

Table 2 – Breakdown of Total Projects by Type

	Total Projects (in $ millions)	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	Sum
1	Total ICM-eligible Growth/Attachments Projects (from Table 1, row 9)	145	28	45	12	116	131	12	10	22	6	*527*
2	Total ICM-eligible Maintenance Projects (from Table 1, row 10)	177	266	139	207	210	186	153	344	133	95	*1,910*
3	Total Attachments Projects	336	289	271	323	353	270	287	274	268	286	*2,957*
4	Total Maintenance Projects	561	556	568	526	501	587	578	597	607	598	*5,679*
5	Other (from Table 1, row 11)	1	14	2	5	6	-	6	18	-	51	*103*
6	**Total**	**1,220**	**1,153**	**1,025**	**1,073**	**1,186**	**1,174**	**1,036**	**1,243**	**1,030**	**1,036**	***11,176***

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Kacicnik
To Mr. Quinn

REF: Tr.3 p.44.

To clarify base load factors and heat-sensitive load.

Response:

The method of setting baseload profiles for EGD's general service customers discussed in response to FRPO Interrogatory #20 (Exhibit C.FRPO.20) was approved by the Board in EBRO 473 (1992). The Board approved method establishes how the baseload is profiled. EGD /u has used the methodology consistently since 1992.

The Applicants observe that changes to the profiles and/or normalization methodologies would require Board approval.