ENBRIDGE

Bonnie Jean Adams
Regulatory Coordinator

tel 416-495-5499
fax 416-495-6072
EGDRegulatoryProceedings@enbridge.com

Enbridge Gas Distribution
500 Consumers Road
North York, Ontario M2J 1P8
Canada

May 11, 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
Hearing - Undertaking Responses

Further to the submission on May 9, 2018, enclosed please find the following undertaking responses:

- J1.4,
- J2.1 to J2.2; and
- J2.4 to J2.5.

Please contact the undersigned if you have any questions.

Yours truly,

(Original Signed)

Bonnie Jean Adams
Regulatory Coordinator

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 Ms. Girvan

REF: Tr.1, p.168

To provide residential bill impact estimates for 2019 and 2028

Please see Attachment 1.

The estimated bill impacts for 2019 and 2028 represent the lowest and highest bills, respectively, over the 2019 to 2028 deferred rebasing term. The compound average annual rate increase over the rebasing term is estimated to be less than 2 percent of the total sales service residential bill in all rate zones. The actual rate increase in any given year may be greater or less than the compound average.

UNION GAS LIMITED & ENBRIDGE GAS DISTRIBUTION
Calculation of 2019 and 2028 Estimated Total Bill for Union South, Union North and EGD Rate Zone Residential Sales Service Customer

Line No.	Particulars	Approved 1-Apr-18 Total Bill ($) (1)	Estimated 2019 Rates: 2019 Total Bill ($) (2)	Estimated 2019 Rates: 2019 vs 2018 Bill Impact ($)	Estimated 2019 Rates: Annual Increase from 2018 (%)	Estimated 2028 Rates: 2028 Total Bill ($) (2)	Estimated 2028 Rates: 2028 vs 2018 Bill Impact ($)	Estimated 2028 Rates: Compound Average Annual Increase from 2018 (%) (3)
		(a)	(b)	(c) = (b) - (a)	(d) = (c)/(a)	(e)	(f) = (e) - (a)	(g)
	Union South							
	Rate M1							
1	Total Delivery Charges	447.17	458.99	11.82	2.64%	575.27	128.10	2.55%
2	Total Gas Supply Charges	270.98	270.96	(0.02)	-0.01%	270.97	(0.01)	0.00%
3	Total Bill	718.15	729.95	11.80	1.64%	846.24	128.09	1.65%
	Union North							
	Rate 01 - North West							
4	Total Delivery Charges	527.79	539.88	12.09	2.29%	694.71	166.92	2.79%
5	Total Gas Supply Charges	406.35	406.30	(0.05)	-0.01%	417.33	10.98	0.27%
6	Total Bill	934.14	946.18	12.04	1.29%	1,112.04	177.90	1.76%
	Rate 01 - North East							
7	Total Delivery Charges	527.79	539.88	12.09	2.29%	694.71	166.92	2.79%
8	Total Gas Supply Charges	478.12	476.50	(1.62)	-0.34%	505.93	27.81	0.57%
9	Total Bill	1,005.91	1,016.38	10.47	1.04%	1,200.64	194.73	1.79%
	EGD							
	Rate 1							
10	Total Delivery Charges	504.14	516.35	12.21	2.42%	626.77	122.63	2.20%
11	Total Gas Supply Charges	345.29	345.40	0.11	0.03%	346.80	1.51	0.04%
12	Total Bill	849.43	861.75	12.32	1.45%	973.57	124.14	1.37%
	EGD @ 2,400 m^3 (4)							
	Rate 1							
11	Total Delivery Charges	527.46	540.73	13.27	2.52%	660.75	133.29	2.28%
12	Total Gas Supply Charges	376.71	376.88	0.17	0.05%	378.35	1.64	0.04%
13	Total Bill	904.17	917.61	13.44	1.49%	1,039.10	134.93	1.40%

Notes:

(1) Current approved total sales service bill for a residential customer with annual consumption of 2,200 m^3 per April 2018 QRAM rates (EB-2018-0104 Union, EB-2017-0090 EGD), including cap-and-trade charges and excluding temporary credits/charges and prospective recoveries.

(2) The following assumptions were used to determine the estimate of the 2019 and 2028 total bil
- a) Annual Price Cap Index (PCI) of inflation of 1.73% less productivity of 0% applied each year, while maintaining the current monthly customer charge
- b) Annual Incremental Capital Module (ICM) and Y-Factor adjustments consistent with the assumptions provided in Table 10 and Table 11 at Exhibit C.FRPO.11. The ICM revenue requirement allocated to rate classes in proportion to rate base (excluding rate base associated with Union's ex-franchise rate classes
- c) Union's Normalized Average Consumption (NAC) and EGD's Average Use (AU) adjustment for 2019 based on current forecast of 2019 target and for 2020-2028 based on an assumption of 1% annual decline
- d) Includes one-time base rate adjustments of Union's Deferred Tax Drawdown and EGD's CIS and Customer Care Forecast Costs, Site Restoration Credit Tax deduct and Pension and OPEB costs.
- e) No change to gas commodity and cap-and-trade charges

(3) The compound average annual increase for 2028 is calculated relative to the 2018 total bill provided in column (a

(4) EGD has also provided the estimated bill based on its typical residential profile of 2,400 m^3.

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Kitchen
To Mr. Shepherd

REF: Tr.2, p.18

To advise whether it would, in your view, be consistent with the understanding between Chatham-Kent and the company to impose conditions concerning Amalco's continued presence in Chatham-Kent, but only to the extent they do not create inefficiencies.

In the Applicants' view, the direction and decisions that Amalco will make during the deferred rebasing period will be based on delivering sustained efficiency improvements, which is the underlying premise supporting the amalgamation. As such, the Applicants do not believe that it is necessary to add conditions related to inefficiencies in respect of Amalco's continued presence in Chatham-Kent. The Applicants would not have contemplated any commitments that would in any way result in inefficiencies.

During the exchange that led up to this undertaking there was discussion with certain parties and the Board of the proposed condition of approval as shown in the response to Board Staff Interrogatory #12 found at Exhibit C.STAFF.12 containing the word "may", rather than "shall". The Applicants suggest the following updated wording for the condition listed as number 2 in the list below in order to address that concern (changes in bold):

1. Amalco shall ensure that during the deferred rebasing period that any employment impacts resulting from the amalgamation will be managed on an roughly proportionate basis between the Municipality of Chatham-Kent and the City of Toronto;
2. **To the extent that** Centres of Excellence **are** created in either the Municipality of Chatham-Kent or the City of the Toronto, the Centres of Excellence shall reflect a range of skills and compensation levels, including leadership roles;
3. Employment within the Municipality shall reflect a mixture of entry, middle and senior level roles; and
4. Amalco will commit to a process of regular communication and engagement with the Municipality of Chatham-Kent in respect of the amalgamation and its related impacts and opportunities.

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Kitchen
To Mr. Garner

REF: Tr.2, p.31

To prepare a table comparing rates

Please see Attachment 1 for a comparison of Union North, Union South and EGD general service rate classes.

Comparison of General Service Rate Classes for Union North, Union South and Enbridge Gas Distribution

Line		Union North - April QRAM (EB-2018-0104)				Union South - April QRAM (EB-2018-0104)				Enbridge Gas Distribution - April QRAM (EB-2018-0090)			
No.	Particulars (cents / m^3)	Rate 01		Rate 10		Rate M1		Rate M2		Rate 1		Rate 6	
1	Applicability	Any customer in Union's North West and North East Zones who is an end user whose total gas requirements at that location are equal to or less than 50,000 m^3 per year.		Any customer in Union's North West and North East Zones who is an end user whose total firm gas requirements at one or more Company-owned meters at one location exceed 50,000 m^3 per year.		Any customer in Union South whose total consumption is equal to or less than 50,000 m^3 per year.		Any customer in Union South whose total consumption is greater than 50,000 m^3 per year.		To any Applicant needing to use the Company's natural gas distribution network to have transported a supply of natural gas to a residential building served through one meter and containing no more than six dwelling units.		To any Applicant needing to use the Company's natural gas distribution network to have transported a supply of natural gas to a single terminal location for non-residential purposes.	
2	Monthly Charge		$21.00		$ 70.00		$ 21.00		$ 70.00		$20.00		$ 70.00
3	Delivery Charge	First 100 m^3	9.3485	First 1,000 m^3	7.8789	First 100 m^3	5.0691	First 1,000 m^3	5.0438	First 30 m^3	11.0799	First 500 m^3	10.3500
4	(declining block structure)	Next 200 m^3	9.1086	Next 9,000 m^3	6.3933	Next 150 m^3	4.8051	Next 6,000 m^3	4.9478	Next 55 m^3	10.4625	Next 1,050 m^3	8.2392
5		Next 200 m^3	8.7293	Next 20,000 m^3	5.7225	All over 250 m^3	4.1228	Next 13,000 m^3	4.7663	Next 85 m^3	9.9791	Next 4,500 m^3	6.7611
6		Next 500 m^3	8.3811	Next 70,000 m^3	5.1633			All over 20,000 m^3	4.4155	Over 170 m^3	9.6188	Next 7,000 m^3	5.8114
7		Over 1,000 m^3	8.0934	Over 100,000 m^3	3.0448							Next 15,250 m^3	5.3894
												Over 28,300 m^3	5.2834
	Cap-and-Trade (If applicable)												
8	Customer-Related Charge		3.3181		3.3181		3.3181		3.3181		3.3181		3.3181
9	Facility-Related Charge		0.0240		0.0240		0.0240		0.0240		0.0337		0.0337
	(Included in Delivery Charge on customer's bill)												
10	Storage Service Charges	Union North West	2.1960	Union North West	1.6552		0.7331		0.6483	Included in Delivery Charge		Included in Delivery Charge	
11	(If applicable)	Union North East	6.3886	Union North East	4.5497								
12	Gas Transportation Service	Union North West	6.6669	Union North West	5.8356	Included in Commodity Charge		Included in Commodity Charge		Transportation	4.7525	Transportation	4.7525
13	(If applicable)	Union North East	2.7452	Union North East	2.5155					Transportation Dawn	1.0404	Transportation Dawn	1.0404
14	Commodity Cost of Gas and Fuel	Union North West	9.6085	Union North West	9.6085		12.3167		12.3167		9.4452		9.4665
15	(If applicable)	Union North East	12.5991	Union North East	12.5991								
16													
17	Annual Deferral Account Disposition	Price adjustments recovered/refunded prospectively over 6 months.		Price adjustments recovered/refunded prospectively over 6 months.		Price adjustments recovered/refunded prospectively over 6 months.		Price adjustments recovered/refunded prospectively over 6 months.		One time annual deferral adjustment recovered/refunded on actual consumption for the period.		One time annual deferral adjustment recovered/refunded on actual consumption for the period.	
18	Gas Cost Adjustments	Price adjustments recovered/refunded prospectively over 12 month period.		Price adjustments recovered/refunded prospectively over 12 month period.		Price adjustments recovered/refunded prospectively over 12 month period.		Price adjustments recovered/refunded prospectively over 12 month period.		Gas Cost Adjustment Rider C recovered/refunded prospectively over 12 month period.		Gas Cost Adjustment Rider C recovered/refunded prospectively over 12 month period.	

Line No.	Annual Residential Bill (Based on 2,200 m^3 consumption)	Union North West Bill ($)	Union North East Bill ($)	Union South Bill ($)	EGD Bill ($)
19	Delivery Charges	528	528	447	504
20	Gas Supply Charges	406	478	271	345
21	Total Bill	934	1,006	718	849

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Kitchen
To Mr. Richler

REF: Tr.2, p.89

To provide a revised version of OEB Staff's chart at tab 3 of Exhibit K1.6.

In responding to this Undertaking the determination of a payback period for Amalco should include the contribution of savings that Amalco needs to meet each years allowed ROE (Shortfall). The sum of the Shortfall and the outlay of integration capital represent the total amount of savings that Amalco will have to achieve in order to meet the OEB allowed ROE over the deferred rebasing period (Cumulative Shortfall). Over the deferred rebasing period, Amalco forecasts that its costs to operate the business will exceed the revenues it receives under the Price Cap Index (PCI), including ICM rate adjustments and meeting the allowed ROE each year will be dependent on its achievement of forecasted integration related savings.

The following graphs show when Amalco has achieved sufficient savings to offset the Cumulative Shortfall (Crossover Point). The Crossover Point is where the Cumulative Shortfall and the forecasted Net O&M savings lines cross. The first graph shows the information provided in Exhibit K1.6, Tab 3 and adds a line to show the Applicants' perspective.

Two cases are provided to show a possible range of Crossover Points that Amalco may encounter over the ten year deferred rebasing period.

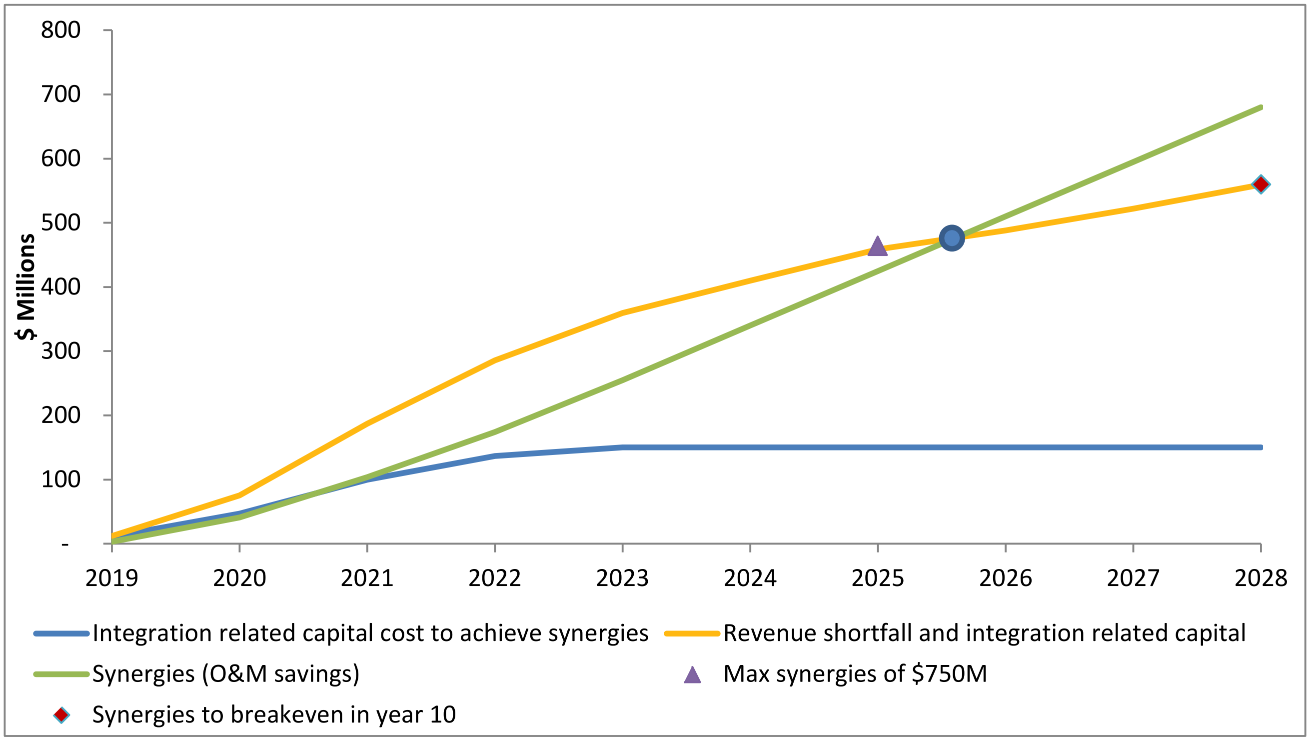
Case A: Base Case of $150 million capital investment and $680 million Net O&M savings
The yellow line shown in Graph 1 represents the Cumulative Shortfall for Amalco over the ten year term. The data for the Cumulative Shortfall line is located in row A.3 of Table 1.

The Cumulative Shortfall value is the sum of row A.1 and row A.2 in Table 1. These two rows represent Amalco's annual deficiency required to achieve that year's allowed ROE and that year's integration capital cost. For each of these items their source or calculation method is stated in the far right column of Table 1.

For Case A, the Crossover Point for Amalco is 7.5 years into the ten year term. The 7.5 year mark is when Amalco is forecasted to recover the cost to operate its base business and recover its integration capital outlay.

Graph 1 also shows two sensitivities for Case A. The triangle mark found at year 2025 on the yellow line identifies a payback period of 7 years should Amalco outlay $150 million in capital investment and achieve the maximum forecasted savings of $750 million.

The diamond mark found at year 2028 of the yellow line identifies that if Amalco spends $150 million in capital investment and achieves savings of $560 million, the payback period would be 10 years.



Graph 1: Case A with $150 million capital investment and $680 million Net O&M savings

A Base Case: $150M/$680M (capex/synergies)

	Payback Net cash flow approach ($ Millions)	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	Source/Calculation
A.1	Revenue shortfall to meet allowed ROE	1	28	59	62	60	50	49	30	34	38	Exhibit B, Tab 1, Table 3
	Cumulative	1	29	87	149	209	260	309	338	372	410	
A.2	Integration related capital cost to achieve synergies	11	36	53	37	13	-	-	-	-	-	Exhibit B, Tab 1, Attachment 12
	Cumulative	11	47	100	137	150	150	150	150	150	150	
A.3	Revenue shortfall and integration related capital	12	64	112	99	73	50	49	30	34	38	Line A.1 plus Line A.2
	Cumulative Shortfall	12	76	187	286	359	410	459	488	522	560	
A.4	Synergies (O&M savings)	3	38	63	70	81	85	85	85	85	85	Exhibit B, Tab 1, Attachment 12
	Cumulative	3	41	104	174	255	340	425	510	595	680	
A.5	Gap - synergies vs revenue shortfall and integration related capital	(9)	(35)	(83)	(112)	(104)	(70)	(34)	22	73	120	Cumulative A.4 less Cumulative Shortfall (A.3)

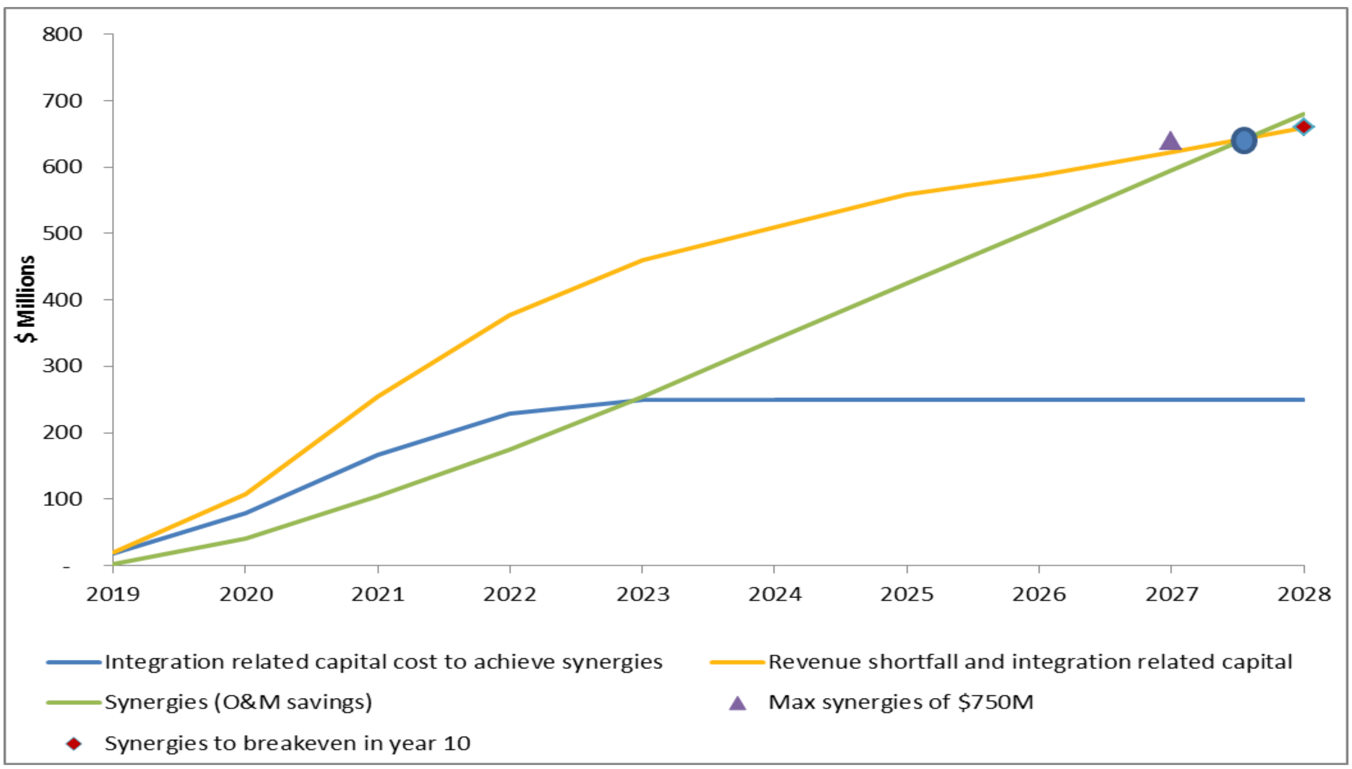
Table 1: Data and sources for Case A and Graph 1

Case B: Maximum Capital Investment of $250 million and $680 million Net O&M savings
Similar to Case A, the yellow line shown in Graph 2 represents the Cumulative Shortfall for Amalco over the ten year term. The data for the Cumulative Shortfall line is found in row B.3 of Table 2.

For Case B, the Crossover Point for Amalco is 9.5 years into the ten year term. The 9.5 year mark is when Amalco is forecasted to recover the cost to operate its base business and recover its integration capital outlay.

Graph 2 also shows two sensitivities for Case B. The triangle mark found at year 2027 identifies a payback period of 9 years should Amalco outlay $250 million in capital investment and achieve the maximum forecasted savings of $750 million.

The diamond mark found at year 2028 identifies that if Amalco spends $250 million in capital investment and achieves savings of $660 million, the payback period would be 10 years.



Graph 2: Case B Maximum Capital Investment of $250 million and $680 million Net O&M savings

B Scenario: $250M/$680M (capex/synergies)

Payback Net cash flow approach (Millions)		2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	
B.1	Revenue shortfall to meet allowed ROE	1	28	59	62	60	50	49	30	34	38	Exhibit B, Tab 1, Table 3
	Cumulative	1	29	87	149	209	260	309	338	372	410	
B.2	Integration related capital cost to achieve synergies	18	60	88	62	22	-	-	-	-	-	Exhibit B, Tab 1, Table 4 (profiled the same as the base case)
	Cumulative	18	78	167	228	250	250	250	250	250	250	
B.3	Revenue shortfall and integration related capital	19	88	147	123	82	50	49	30	34	38	Line B.1 plus Line B.2
	Cumulative Shortfall	19	107	254	377	459	510	559	588	622	660	
B.4	Synergies (O&M savings)	3	38	63	70	81	85	85	85	85	85	Exhibit B, Tab 1, Attachment 12
	Cumulative	3	41	104	174	255	340	425	510	595	680	
B.5	Gap - synergies vs revenue shortfall and integration related capital	(16)	(66)	(150)	(203)	(204)	(170)	(134)	(78)	(27)	20	Cumulative B.4 less Cumulative Shortfall (B.3)

Table 2: Data for Case B and Graph 2

ENBRIDGE GAS DISTRIBUTION INC. AND UNION GAS LIMITED

Undertaking of Mr. Kitchen
To Mr. Quinn

REF: Tr.2, p.176

To provide information on the settlement agreement

Please see Attachment 1 for information related to Union's Dawn-Parkway System demand and capacity and information on Union's Parkway Delivery Obligation ("PDO") shift for the years 2013 to 2018. Information on the 2017 Dawn-Parkway Project (EB-2015-0200) Settlement Agreement can be found at Attachment 1, Note 6.

UNION GAS LIMITED

Dawn to Parkway System Capacity and Demand, PDO Shift Details, and PDO Demand Revenue Difference

Line No.	Particulars (TJ/d)	2013 Forecast W13/14		W14/15		W15/16		W16/17		W17/18	
		(a)		(b)		(c)		(d)		(e)	
	Dawn-Parkway System										
	Included in Rates										
1	2013 Cost of Service (EB-2011-0210) Capacity	6,803		6,803		6,803		6,803		6,803	
2	Incremental Dawn-Parkway Capacity (1)	-		-		433		876		1,332	
3	Total	6,803		6,803		7,236		7,678		8,135	
	Other Changes (No Impact to Rates)										
4	Other Dawn-Parkway Capacity Changes	-		(2)		(222)		(170)		(246)	
	Annual Forecast										
5	Total Forecasted Dawn-Parkway Capacity	6,803		6,801		7,014		7,508		7,889	
6	Total Forecasted Dawn-Parkway Demands	6,593		6,643		7,049		7,443		7,783	
7	Forecast Dawn-Parkway Excess/(Shortfall) (line 5 - line 6) (2)	210	(3)	158		(35)	(5)	65		106	(6)
	PDO Shift										
	Customers without M12 service										
8	Temporarily Available Capacity	-		146		23		13		-	
9	Permanent Capacity (from Dawn-Kirkwall Turnback) (5)	-		-		123		133		200	
10	Total	-		146	(4)	146		146		200	
	Customers with M12 service - Permanent Capacity										
11	All Customers excluding TCE Halton Hills	-		19		19		19		19	
12	TCE Halton Hills	-		48		48		48		62	
13	Total	-		66		66		66		81	
14	Total PDO Shift (line 10 + line 13)	-		212		212		212		280	
	PDO Shift cost in Rates			2015 Rates		2016 Rates		2017 Rates		2018 Rates	
15	Dawn-Parkway Demand Costs ($000's) (5)			5,143		5,694		6,720		9,726	
16	Incremental Compressor Fuel Costs ($000's)			1,900		1,797		1,707		1,705	
17	Total			7,043		7,491		8,426		11,431	
	Foregone Demand Revenue of M12 Dawn-Kirkwall Turnback										
18	Used for PDO Shift ($000's) (7)			580		6,158		7,699		11,933	
19	Demand Revenue Difference ($000's) (line 15 - line 18)			4,563		(464)		(979)		(2,207)	(8)

Notes:

(1) W15/16 - Incremental capacity resulting from the Brantford-Kirkwall / Parkway D Project of 433 TJ/d.
W16/17 - Incremental capacity resulting from the Dawn Parkway 2016 System Expansion Project of 443 TJ/d.
W17/18 - Incremental capacity resulting from the 2017 Dawn Parkway Project of 457 TJ/d.

(2) The PDO shift was reflected in Dawn-Parkway excess/(shortfall) beginning W15/16.

(3) The W13/14 forecast filed in Union's 2013 Cost of Service proceeding (EB-2010-0210) included 210 TJ/d of excess Dawn-Parkway capacity. In the EB-2011-0210 Decision, the Board accepted Union's forecast and regulatory treatment.
Union's 2013 cost allocation study allocates Dawn-Parkway demand costs in proportion to distance weighted design day demands. The 2013 allocation resulted in approximately 84% of costs allocated to Union's ex-franchise rate classes and 16% to Union's in-franchise rate classes.

(4) In accordance with the Settlement Framework for Reduction of Parkway Delivery Obligation ("PDO Framework") (EB-2013-0365) effective April 1, 2014, Union had temporarily available Dawn-Parkway capacity which was used to facilitate 146 TJ/d of PDO shift. Parties agreed Union would include the demand and fuel costs associated with the 146 TJ/d of capacity in delivery rates. (PDO Framework, Paragraph B1)

(5) Consistent with the PDO Framework, effective November 1, 2015 the temporarily available capacity was forecast to be used for other purposes leaving Parkway in a delivery shortfall position. Parties agreed that the demand and fuel costs associated with the temporarily available capacity would remain in delivery rates for Union to manage the Parkway delivery shortfall through the acquisition of incremental resources. M12 Dawn to Kirkwall turnback was to be used to first reduce the Parkway delivery shortfall and then to further reduce the remaining PDO. All incremental costs associated with the incremental PDO reduction were recovered by Union in rates (or deferral account due to timing differences). (PDO Framework, Paragraph B2)

(6) As part of the 2017 Dawn-Parkway Project (EB-2015-0200), Union had forecast a surplus of 30,393 GJ/d on the Dawn-Parkway System following the completion of the project. As part of the EB-2015-0200 Settlement Agreement, Union agreed to market the surplus capacity in accordance with the Storage and Transportation Access Rule (“STAR”) and credit the revenues to the project deferral account.

(7) Exhibit J2.5, Attachment 2, line 7.

(8) Dawn-Parkway demand revenue difference is expected to continue through the deferred rebasing period.

UNION GAS LIMITED
Calculation of Foregone Demand Revenue from Turnback Used for PDO Shift

Line No.	Particulars	2015 Rates W14/15	2016 Rates W15/16	2017 Rates W16/17	2018 Rates W17/18
		(a)	(b)	(c)	(d)
	Turnback Used For PDO Shift (TJ/d)				
1	Dawn-Kirkwall turnback - customers without M12 service (1)	-	190	202	293
2	Dawn-Parkway turnback - customers with M12 service (2)	19	19	19	19
	Rate M12 Demand Rates ($/GJ/mo) (3)				
3	Dawn to Kirkwall	2.193	2.421	2.865	3.154
4	Dawn to Parkway	2.604	2.883	3.402	3.716
	Foregone Demand Revenue from M12 Turnback Used for PDO Shift ($000's)				
6	Dawn-Kirkwall (line 2 x line 4 x 12)	-	5,515	6,940	11,104
5	Dawn-Parkway (line 1 x line 3 x 12)	580	643	758	828
7	Total Foregone Revenue (line 5 + line 6)	580	6,158	7,699	11,933

Notes:
(1) Dawn-Kirkwall contract turnback used to create permanent Dawn-Parkway capacity shown at Exhibit J2.5, Attachment 1, line 9 to facilitate PDO Shift.
(2) Exhibit J2.5, Attachment 1, line 11.
(3) Demand rates from Union's annual rates filings: 2015 Rates (EB-2014-0271), 2016 Rates (EB-2015-0116), 2017 Rates (EB-2016-0245), and 2018 Rates (EB-2017-0087).