REF: Exhibit B1 / Tab 1 / Schedule 1/ p. 6

Preamble: EGI's evidence states: *The EGD rate zone's October 1, 2018 EB-2018-0249 rates have a Purchased Gas Variance Account ("PGVA") reference price of $163.524 10^3m^3. The PGVA reference price is comprised of commodity, transportation and load balancing costs. In order for adjustments to gas cost rates to only capture / reflect the impacts of the plan mix change in the 2019 gas supply portfolio versus the 2018 portfolio, the cost of the 2019 portfolio is based on the October 1, 2018 QRAM PGVA reference price of $163.524 10^3m^3. This approach ensures that the proposed rate impacts are a function of the year-over-year changes in gas supply portfolio only and net of price / cost changes that are otherwise captured through the QRAM methodology.*

Being respectful of PO No. 2 which excludes gas supply costs which are the subject of a future proceeding, we are interested in understanding the year over year changes associated with gas supply or load balancing costs that are embedded in the distribution rates.

1) For gas supply or load-balancing costs included in distribution rates:
   a) Please provide a brief summary of the principles used to separate gas supply or load balancing costs between gas supply costs and distribution costs.
   b) Please provide any changes to cost allocation methodologies, practices or assumptions from to 2018 to 2019.
   c) Please provide a summary of the categories of gas supply or load balancing costs that are allocated to distribution rates.
   d) Please provide a comparison of the 2018 and 2019 costs for each of those categories of cost.
   e) Please explain the drivers associated with any material changes in the quantum of costs allocated to distribution rates.

REF: Exhibit B1 / Tab 1 / Schedule 1/ p. 8

Preamble: EGI's evidence states: *Similarly, the distribution costs are recovered in rates primarily from the delivery rates, however, some distribution related unit rates / costs are recovered from the Company's commodity, transportation, and load balancing charges.*

2) Please identify the categories of distribution costs captured in each of:
   a) Commodity
   b) Transportation
   c) Load Balancing

3) Please provide the total forecasted cost for each of the above categories:
    a) 2018
    b) 2019
    c) Please provide the drivers for any material difference between the two years.
    d) Please provide any changes to cost allocation methodologies, practices or assumptions from to 2018 to 2019.

REF: Exhibit B1 / Tab 1 / Schedule 1/ p. 28-29

Preamble: EGI's evidence states: *Enbridge Gas also proposes to build into rates the surplus Dawn-Parkway capacity of 30,393 GJ/d resulting from the 2017 Dawn-Parkway Expansion project (EB-2015-0200). As part of the 2017 Dawn-Parkway proceeding, parties agreed Union would credit the Lobo D/Bright C/Dawn H Compressor Project Deferral Account (Account No. 179-144) for revenue generated from the 30,393 GJ/d of surplus capacity. Enbridge Gas anticipates that this surplus capacity will be sold long-term beginning on November 1, 2018 and for the remainder of the deferred rebasing period.*

We would like to understand better the utilization of the Dawn-Parkway system.

4) For the Dawn-Parkway system
    a) What, if any, capacity was turned back in 2018?
    b) How much additional capacity was sold in 2018?
    c) What was the 2018/19 winter design capacity of the system?
    d) What was the 2018/19 design day demand on the system?
    e) What if, any capacity, is scheduled for turnback in 2019?

5) Please provide the EGI index of customers for the Dawn-Parkway system as of Jan. 1, 2019 including totals to each delivery point.
    a) What is the forecasted revenue in 2019 for C1 contracts that were in place January 1, 2019?

REF: Exhibit B1 / Tab 1 / Schedule 1/ p. 32-33

Preamble: EGI's evidence states: *Enbridge Gas proposes to update the allocation of the PDO and PDCI demand-related costs based on the 2019 Dawn-Parkway design day demands and the allocation of the in-franchise compressor fuel costs based on 2019 forecast volumes.*

We would like to understand better this PDO and PDCI adjustment.

6) Is this adjustment premised on the principle that all of the costs of the Dawn-Parkway system including the 2015-2017 expansions are included?
7) Is this precisely the same methodology including assumptions developed for and implemented in the 2014-2018 period?
   a) If not, please re-produce Tab F1, Tab 2, Rate Order, Working Papers, Schedule 11 using the original methodology and assumptions.
   b) If so, please describe what adjustments are taking place and provide the 2018 and 2019 figures for those respective categories of adjustments.

REF: Exhibit B1 / Tab 1 / Schedule 1/ p. 42

Preamble: EGI's evidence states: *As of November 1, 2017 the initial Parkway shortfall has been fully eliminated as a result of Dawn to Kirkwall turnback, and therefore Union did not need to take action to manage the shortfall.*

We would like to understand better how the shortfall was managed in the period after PDO reduction started and November 1, 2017.

8) Please confirm that Union South experienced a peak day in mid-February 2015.
   a) What was the capacity of the Dawn-Parkway system for the winter of 2014/15?
   b) For the peak day or day of highest Dawn-Parkway throughput in February:
      i) What was the throughput?
      ii) What was the daily demand at Parkway?
      iii) What was the daily demand at Kirkwall?
      iv) What was the in-franchise demand?
      v) Please explain how any shortfall was managed?

REF: Exhibit B1 / Tab 1 / Schedule 1/ Appendix A/ page 2

Preamble: EGI's evidence states: *The PGVA will record adjustments related to transactional services activities which are designed to record the impact of direct and avoided costs between the PGVA and the TSDA. These adjustments are required to ensure appropriate allocation of costs and benefits to the underlying transactions and appropriate recording of amounts in the PGVA and TSDA for purposes of deferral account dispositions.*

We would like to understand better how these transactions are distinguished?

9) Please provide the policy or guidelines followed by staff to differentiate direct and avoided costs between PGVA and TSDA.
   a) Please clarify if this is a new practice or, if it has been in place, for how long.
   b) Please provide a few examples of how this policy or guideline is used.
   c) Are there any financial employee incentives tied to the level of margin for TSDA for those distinguishing the difference?

Preamble: EGI evidences states: *In addition, the PGVA will record the amounts related to unforecast penalty revenues received from interruptible customers who do not comply with the Company's curtailment requirements, unauthorized overrun gas revenues, the use of electronic bulletin boards, and the unforecast Unabsorbed Demand Charge ("UDC") that arises as a consequence of the Company voluntarily leaving transportation capacity unutilized in order to gain a net benefit for the customer by purchasing lower priced unforecast discretionary delivered supplies.*

We are interested in understanding better how the un-forecast UDC costs will be tracked with the alternative purchases.

10) Please clarify EGI's intention regarding tracking these UDC costs. Please include explanation of:
   a) The timing of these UDC charges.
   b) The timing of corresponding alternative arrangements for the purpose of matching.
   c) How corresponding marketing of the unutilized capacity will be tracked.
   d) The determination of net benefit of the series of transactions.
   e) The allocation of the net benefit.

REF: Exhibit B1 / Tab 1 / Schedule 1/ Appendix A/ page 24

Preamble: EGI evidence states: *The purpose of the LRAM is to record the amount of distribution margin gained or lost when the Company's DSM programs are less or more successful than budgeted in the fiscal year*.

We would like to understand better the margin calculation associated with LRAM.

11) Using the Rate 6 class of customers, please describe from EGD's most recent approved DSM dispersal how margin is calculated ensuring that description is provided on:
    a) once the savings are verified, how the lost revenues are tied to costs.
    b) detail on how the costs are calculated for both fixed and variable costs of the company.

REF: Exhibit B1 / Tab 1 / Schedule 1/ Appendix B/ page 11

Preamble: EGI evidence states: *To record as a debit in Deferral Account No. 179-131 a receivable from customers and a reduction in cost of gas for the unit rate of optimization revenues refunded to in-franchise customers multiplied by the actual distribution transportation volumes.*

We are interested in understanding better the allocations to this account.

12) How does EGI differentiate between releasing unplanned UDC transacted through release and holding the capacity for exchange opportunities?
    a) Please provide an example from this last winter to describe the considerations, evaluation and decision-making associated with these costs/opportunities.

REF: Exhibit B1 / Tab 1 / Schedule 1/ Appendix G/ page 1

Preamble: EGI evidence states: *Committment to post the design day Dawn-Parkway system capacity required for Union North, Union South and Enbridge Gas zones on an aggregated basis online as part of the Index of Transportation Customers.*

13) Please provide the source of that commitment.
    a) Please provide the location, timing and frequency of the posting.

REF: Exhibit B1 / Tab 2 / Schedule 1/ page 18-20

Preamble: EGI evidence states: *Given the magnitude of the $95.3 million investment in the Sudbury Replacement project, incremental funding of the project is required. The cumulative revenue requirement of the project from 2018 through 2023 is over $47 million. Union was not able to reprioritize 2018 Capital investment in order to fund this investment using existing rates. The purpose of the capital pass through mechanism was to provide a means for Union to make significant investments under its price cap plan. Given that the timing of the investment in the Sudbury Replacement project occurred in late 2018, Enbridge Gas will be impacted by the first full year revenue requirement in 2019, during which time the Incremental Capital Module will apply.*

We would like to understand better the decisions around the Sudbury Replacement project.

14) Please provide Union Gas' approved capital budget and actual expenditures for each year of the 2014-2018 IRM period.
15) When was the need for the Sudbury Replacement first identified?
    a) Please provide all internal reports and correspondence that pertain to the need and the timing for replacement.

REF: Exhibit C1 / Tab 1 / Schedule 1/ page 45
and Exhibit C1 / Tab 2 / Schedule 1/ page 632, 637, et al. & 703

Preamble: EGI uses the term "intolerable risk". We were unable to find a specific definition for the term in the AMP. We would like to understand better how this term is applied.

16) Please provide EGI's definition of "intolerable risk".
    a) How would EGI measure or qualify an issue into that category?
    b) How would an issue move from a "tolerable risk" to an "intolerable risk"?

REF: Exhibit C1 / Tab 2 / Schedule 1/ pages 1-94

Preamble: We are interested in understanding better some aspects of the EGD Asset Management plan. In reviewing the document, it is evident that KPMG has performed a maturity assessment (p.59) and EGD followed Deloitte's Value-Based Assessment Management Model. However, in reviewing the evidence, it is unclear how either Consulting Firm recognizes the financial incentives to invest capital for the potential of enhanced return.

17) From Enbridge's engagement of KPMG, and potentially Deliotte, please provide information shared by the consulting firms that address the reality of shareholder incentives to invest capital.
    a) From those materials, please provide information shared by the consulting firm that address the role of employee incentives in enhancing or balancing the shareholder incentives.
    b) Please provide EGI's commentary on steps undertaken to ensure that its organizational leadership balances shareholder incentives with customer value in the area of capital planning and decision-making.

REF: Exhibit C1, Tab 2, Schedule 1, Page 116-193

Preamble: We respect that steel gas mains deteriorate over time. At the same time, replacement must occur in a prioritized fashion over decades.

18) Please provide any EGD or Union Gas studies that analyzed the merits (financial and risk-related) of enhanced cathodic protection investments to reduce risk and defer replacement requirements.

REF: Exhibit C1, Tab 2, Schedule 1, Page 152

Preamble: EGI evidence states: *The predominant failure mechanism for copper risers at EGD is associated only with internal pipe conditions and is not affected by external conditions or the environment. Analysis determined that turbulent flow will be reached in copper risers at pressure as low as 5 PSIG at 30,000 BTU. The average furnace uses between 70,000 BTU to 100,000 BTU. A typical gas water heater uses between 36,000 BTU to 66,000 BTU. This supports the sampling which showed wall loss on all copper risers, as turbulent flow can be reached at such low pressure from standard home appliances. The localized corrosion failure is illustrated in* ***Figure 5.2-55****.*

We are interested in understanding better the risks associated with the erosion corrosion of the copper risers.

19) In imperial units (psig), what is the maximum and minimum pressure of the majority of EGD distribution systems?

   a) If EGD has multiple pressure ranges for distribution, please provide what term is used to describe the system, what range of pressures and the percentage of each systems of all EGD distribution systems under 100 psig.
   b) What percentage of these 280,000 risers would actually be exposed to 5 psig?
   c) Does EGD have a study that looks at the failure rates of the copper risers in different pressure systems?
      i) If so, please file the study.
   d) Is EGD giving priority to the replacement of those risers exposed to the lowest pressures?

REF: Exhibit C1, Tab 3, Schedule 1, Page 161

Preamble: We would like to understand better the delineation between regulated and non-regulated investment in CNG stations.

20) How does Union Gas/EGI differentiate which stations are built inside or outside the regulated utility?

   a) Are the regulated stations receiving comparable Federal funding and the non-regulated stations?
      i) If not, why not?

REF: Exhibit C1, Tab 3, Schedule 1, Page 176

Preamble: *EGI evidence states: Based on the current forecast for in-franchise general service and contract growth in the Panhandle Transmission System market, Union has identified the need to reinforce the Panhandle Transmission System for the 2026 to 2027 winter operating season.*

We would like to understand better Union Gas'/EGI efforts to consider market based solutions to avoid or defer infrastructure investment.

21) With increased capability to flow gas on Panhandle Eastern, has Union evaluated the benefit of offering an incentive for firm deliveries at Ojibway?
   a) If so, what has been done and what has been learned?
   b) If not, why not?

REF: Exhibit E1 / Tab 4 / Schedule 2/ page 5

Preamble: EGI evidence states: *In 2017, EGD introduced a process to track and assess potential measurement errors at TCPL's gate stations, compiling a list of measurement assets at each gate station and identified the flow range of each device.*

We are interested in understanding better the process that EGI has implemented to assess potential measurement errors at TCPL gate stations.

22) Please provide a list of EGI station sites that have chromatographs or other instrumentation to measure the heat value of the gas received.
   a) Beyond the Victoria Square Station, please identify any concerns that EGI has discerned since implementing this program.
   b) What issues has this program addressed and rectified?
   c) Has EGI agreed to any improvements in custody transfer between itself and TCPL since the initiation of this program?
   d) If EGI has a chromatograph on the Ottawa line from TCPL, please provide the average daily heat value for the period of October 2018 to December 2018.
   e) If EGI has a chromatograph at Parkway, please provide the average daily heat value for the period of October 2018 to December 2018.

REF: Exhibit E1 / Tab 4 / Schedule 9/ page 2-3

Preamble: EGI evidence states: *This project, in-part, underpins elections made by Enbridge in TCPL's 2019 New Capacity Open Season ("NCOS") which includes 75,000 GJ per day of new short-haul capacity from Parkway to the Enbridge CDA.*

We are interested in understanding better the system demand need for this capacity.

23)For the 75,000 GJ per day evidenced in this section:

a) Where is this incremental demand needed?

b) In that location, how much has the 2019/20 demand increased over 2017/18?

c) Is there any compensating reduction in capacity to reduce the impact of the cost of the incremental capacity?

i) If so, please provide the details of the reduction.

ii) If not, please provide details on the expected utilization of the excess capacity.

REF: Exhibit E1 / Tab 4 / Schedule 9/ page 3

Preamble: EGI evidence states: *Union Gas and TCPL each have NCOS offerings for transportation services with projected in service dates for each NCOS as early as November 1, 2021. Union Gas is offering M12 services the Dawn-to-Parkway System, while TCPL is offering various firm transportation services on the Mainline System. The NCOS offering from Union Gas was held from August 29, 2018 to November 16, 2018, while the NCOS offering from TCPL was held from October 15, 2018 to November 14, 2018.*

We are interested in understanding the results of the open season in the context of asset utilization in the future.

24) Please provide the amount of capacity requested in the initial bid respecting that there are levels of additional negotiating and contracting steps to be exercised (i.e., we respect that the ultimate contracted quantity may vary from the initial bid in the contracting process but we are asking for an indication of the amount bid).

25)With the best information available at this time, please provide the incremental capacity that would come on line in 2021.

a) What, if any, facilities does EGI believe will be needed to meet this level of contracting?

26) Has EGI initiated any process to determine the markets ability to provide firm transport or obligated deliveries that would reduce potential infrastructure expenditures?

a) If yes, please describe.
b) If not, what inhibits EGI from taking this step contemplated in the Settlement Agreement of Union Gas in last Dawn-Parkway expansion build (EB-2015-0200)?

REF: Exhibit E1 / Tab 4 / Schedule 9/ page 3

Preamble: EGI's evidence states: *The 2018 to 2020 toll application was filed in December 2017 under hearing order RH-001-2018 and is currently under review by the NEB. In the meantime, the NEB has approved the tolls resulting from the RH-001-2014 Decision on an interim basis while the 2018 to 2020 toll application is under review. The 2019 Gas Costs budget is underpinned by the interim tolls which, compared to TCPL's previous finalized tolls, yield $30-million in annual savings for EGD's transportation contracts that are in place for the 2019 calendar year.*

We would like to understand better the cost implications for Ontario resulting from the toll resetting process.

27) Please provide the applicable NEB reference and, ideally the link, for the TCPL 2018-2020 Rates proceeding.

a) Please describe the methodology and the quantities used to determine the $30 million in annual savings for EGD transportation contracts.
    i) Please present the determination in a table.
b) Using the same approach in a), please provide the comparable figure for Union Gas' TCPL transportation contracts.
c) Did the former Enbridge Gas Distribution and Union Gas companies enter into an agreement to set tolls at the applied for levels?
    i) If the applied for tolls were not tolls used to calculate the $30 million in EGD transportation contract savings, please calculate the annual savings expected from the applied for tolls versus those in place in 2017 for:
        (1) EGD transportation contracts

(2) Union Gas transportation contracts

(3) Please produce the above determination in a table that provides understanding of the calculation

d) Did the NEB accept and implement the applied for tolls of that agreement or did they determine the agreement did not set tolls in the public interest?

i) As a result of the NEB decision, please provide the annual savings expected from the approved tolls versus those in place in 2017 for:

(1) EGD transportation contracts

(2) Union Gas transportation contracts

(3) Please produce the above determination in a table that provides understanding of the calculation.