REF: EB-2019-0137 5 Year Gas Supply Plan ("PLAN"), page 7

Preamble: EGI's plan states: "*The Plan will never undergo transformational change within the EGD and Union rate zones' portfolios within any given year*".

We would like to understand better how EGI is looking at short-term opportunities to enhance the efficiency of the two legacy company portfolios.

1) Will EGI strive to transform the plan through optimizing STS between legacy EGD and Union Gas rate zones?

Preamble: EGI's plan states: "*EGI is aware of this responsibility, and understands the Board's clarification in the Framework that "the assessment of gas supply plans will not result in a decision on the costs or cost recovery. That would be the subject of related applications. Based on the above, EGI understands the Board's assessment of the Plan will not be an assessment of prudency, or an assessment of the appropriateness of the cost consequences of the Plan*."

2) Please provide EGI's views on the specific proceeding (e.g., rates, deferral, etc.) in which the appropriateness of gas costs would be determined and approved.
   a. In what proceeding would prudence be tested?

REF: PLAN, page 8

Preamble: EGI's plan states: "*Subsequently, the planners must consider the appropriate quantity of upstream transportation contracts, along with storage assets, required to provide an integrated solution for all sales service and bundled DP customers to meet annual, seasonal and design day demand.*"

We would like to understand better how EGI optimizes the long-haul, short-haul and market-based purchase to optimize diversity.

3) How did EGD and Union make decisions on the fraction of upstream assets and market-based purchases at Dawn would be optimal?
   a. Why is the percentage different in the respective legacy territories?

4) Has EGI performed any combined utility SENDOUT runs to start the process of integration?
   a. If so, please provide summary reporting highlighting any area of potential synergies in the short-term or long-term.
   b. If not, please provide the results of a preliminary run of SENDOUT including short-term recommendations for cost savings.

REF: PLAN, page 11

5) Does EGI have any peaking contracts in place for the upcoming winter?
   a. Do the contracts mitigate commodity exposure? If so, now?

REF: PLAN, page 11

6) Of the 280 Bcf of working storage capacity, please provide the amount that is owned by
   a. Legacy EGD
   b. Legacy Union
   c. Enbridge Inc.
   d. Enbridge Inc. owned companies

REF: PLAN, page 43, Table 7, EB-2017-0306, Exhibit JT3.16

Preamble: We would like to understand better the nature of the storage market and choices available to legacy EGD for its storage needs above the utility storage owned by EGD/EGI.

7) For each line, please provide the parameters associated with that storage service using the EGD Storage Matrix evidenced. While we respect that EGI will not add any pricing (charges) in the matrix due to commercial sensitivity, we respectfully request that deliverability parameters or curves are provided that specify the ratchets by date and/or storage fill percentage.

REF: PLAN, page 43

Preamble: EGI evidence states: "*EGI does not plan for any unutilized EGD rate zone capacity of its TCPL long haul transportation given the persistently low prices of supply procured in Alberta and the ability to divert long haul transportation at no or limited incremental cost because the diversions would be generally in path.*"

We would like to understand better the short-term opportunities available to EGI to optimize its portfolio.

8) What, if anything, would prevent EGI from diverting legacy EGD long-haul contracts to the legacy Union Gas system upstream (e.g., WDA, NDA, etc.)?
   a. Please explain EGI's views on this a short-term tactic to optimize the portfolio.

REF: PLAN, page 44

Preamble: EGI evidence states: *"Finally, EGI's evaluation of the costs of a potential supply option is mainly a quantitative exercise. If the option is intended to satisfy average day needs, EGI will evaluate based on landed costs (i.e. $/GJ/d). If the option is intended to meet design day needs, annual costs (i.e. $/GJ/yr) are calculated."*

Preamble: We would like to understand better the comprehensive assessment of customer costs associated with supply choices.

9) How does EGI assess the cost of seasonal load balancing for each supply option?
   a. Please provide an analysis on the total bill impact for an EGI customer in the EGD EDA that compares delivered gas using TCPL (Empress to EDA) vs. Nexus to Dawn redelivered to the EDA in the winter.

REF: PLAN, page 46

Preamble: We would like to understand better the utilization of EGD's Segment A pipeline.

10) Is all of the capacity of Segment A (Parkway to Albion) utilized?
    a. How much of the capacity is used to serve the GTA distribution?
    b. How much of the capacity is utilized by TCE to move gas to Station 130 (Maple)?
    c. Has EGI negotiated any agreements with TCE to maximize the utilization of the pipe during non-peak conditions (e.g., TCE using greater than contracted right)?

REF: PLAN, page 48

11) Please confirm that the peaking service is purchased on annual basis after the gas supply plan determines the demand for the coming winter.

REF: PLAN, page 53, Table 16

Preamble: We would like to understand better the determination of the landed costs and their impact on customer bills.

12) Please provide the path including the individual segments
    a. Please provide each segment's contribution to the total costs.
    b. Please show the calculation that determines that there is less than one percent difference between the current portfolio and the Nexus path.

REF: PLAN, page 57

Preamble: EGI evidence states: "*EGI's preferred planning strategy for storage expiries is to continue to issue RFPs to the market each year to replace any capacity that is expiring.*"

Preamble: We would like to understand better how the company can provide information to the Board to assure the Board that the costs are prudently incurred.

13) How does the Board ensure that there is sufficient transparency on storage costs paid by legacy EGD customers especially where EGD is buying EI storage services?

REF: PLAN, page 59

Preamble: EGI evidence states "*Notwithstanding this level of demand and estimated coefficients, should design conditions and/or customer use exceed the levels assumed in the design day demand forecast models, the utility will not have procured enough transportation assets and is at risk of outages to the downstream distribution system. See Section 8 for a description of how EGI executes its Plan when demand activity deviates from the Plan.*"

We would like to understand better the nature of the risks that customers are exposed.

14) Would it be more appropriate to express this scenario as a risk of higher prices to supplement services on the day than risk of outages?
    a. In the last 10 years, how many outages has EGI (EGD or Union) experienced due to lack of transportation assets?

REF: PLAN, page 62, Figure 27

15) Figure 27 represents that EGI's EGD STS expires in Oct. 2022.
    a. Does the STS contract expire on that date?
    b. Does EGI intend to extend that contract as long as there is no substantial change to the service?

REF: PLAN, page 80

Preamble: Rationale for Panhandle

16) Has EGI explored the efficacy of having a delivery obligation credit at Ojibway to meet design day needs on the Panhandle system?
    a. If so, what were the results?
    b. If not, why not?

REF: PLAN, page 86, Table 29

Preamble: We would like to understand better the qualitative assessment tool (Evaluation Matrix) that EGI has used in evaluating supply sources.

17) Please provide the rationale behind a negative assessment for Reliability of Niagara.
    a. Please provide EGI's reasoning why legacy Union has acquired a disproportionately low contribution of Niagara to its supply mix.
    b. Please provide a summary of the Empire North Expansion project.
    c. What has EGI done to consider this opportunity?

REF: PLAN, page 87, Table 30

Preamble: We would like to understand better how EGI is planning to accomplish the additional re-delivery from storage.

18) Will Union be adding additional horsepower for compression?
    a. What is the current deliverability required for in-franchise demand in terms of percentage of storage space allocated to in-franchise customers?
    b. What will be the deliverability forecasted to be required in 2023/24 in terms of storage space forecasted to be allocated to in-franchise customers?

REF: PLAN, page 90, Table 33

19) Please provide Table 33 adding the path of TCPL to Parkway.
    a. Why was this path not evaluated for the purposes of this exercise?
    b. Could this path be used for helpful diversions to Union North?

REF: PLAN, page 91, Section 13.3

20) Please provide a breakout of contracts delivering to the EDA.

REF: PLAN, Appendix A, page 2

We would like to understand better the planning process.

21) Please explain why the plan starts with "Determine Total Storage Space Available" as opposed to determining the storage need (demand or space required).

REF: PLAN, Appendix B, line 10

22) Please explain why the Parkway to CDA -SN was contracted versus using Segment A.

REF: PLAN, Appendix C

23) Please provide a similar analysis for deliveries to:
   a. Union NDA
   b. Union NCDA
   c. Please expand the analysis to account for load balancing costs.
   d. Did Union do these analyses when the NBJ LTFP was offered by TCE?
      i. If so, did Union contract for any of this capacity?
      ii. If not, why not?

REF: PLAN, Appendix E, page 10

Preamble: EGI evidence states: *"January is consistently the coldest month when measured by HDDs in Ontario, and also can exhibit large variation year-to-year in total HDDs, with a standard deviation in monthly HDD's of 13.5% from 1930 to 2018. February is the next coldest month, with a 20-year average HDD that is 10% lower (warmer) than January with a narrower range of weather, not experiencing the same kind of major cold-spells as January."*

24) Did ICF compensate for the number of days in the month in performing this analysis to state January was coldest?

REF: PLAN, Appendix E, page 40, Exhibit 14 and Appendix H

25) Given the information in these graphs, why is Legacy Union not buying more baseload gas at Niagara?

REF: PLAN, Appendix G

26) Please explain the shift from Union ECDA to Union CDA Amended.

REF: PLAN, Appendix J

27) Please provide a detailed description of how the Board can be assured that EGI will put customer interests as paramount in the choices it can make as the monopoly service provider when the corporate interest of EI is involved (e.g., storage).