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November 12, 2019

Via RESS and Courier

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4
BoardSec@oeb.ca

Attention: Ms. Christine E. Long
Board Secretary and Secretary

Dear Ms. Long:

Re: Corporation of the Town of Marathon North Shore LNG Project Application
Ontario Energy Board File Number: EB-2018-0329 ("Proceeding")
Certarus Ltd. Interrogatories

In accordance with Procedural Order No. 2, please find attached the Certarus Ltd. Interrogatories for the above-noted Proceeding.

If you have any questions regarding these interrogatories, please contact the undersigned.

Yours truly,

L.E. Smith

LES:SR
Attachment

cc: Clint Warkentin, Certarus Ltd.
Applicant and Intervenor List dated October 30, 2019 (Schedule A to Procedural Order No. 2 EB-2018-0329)
Ritchie Murray, Ontario Energy Board
Michael Millar, Ontario Energy Board

Certarus Ltd. Interrogatories

Application for approval to construct a natural gas pipeline and associated facilities in the Town of Marathon, the Township of Manitouwadge, the Township of Schreiber, the Township of Terrace Bay and the Municipality of Wawa

Corporation of the Town of Marathon

EB-2018-0329

November 12, 2019

Certarus-1

Ref: Exhibit A, Tab 1, Schedule 2, pages 7-8

Preamble

In the above reference to the Application, the Corporation of the Town of Marathon (the "**Corporation**"), on its own behalf and as representative of the Township of Manitouwadge, the Township of Schreiber, the Township of Terrace Bay and the Municipality of Wawa (the "**Municipalities**") states that "…and the Utility is not exposed to any capital cost overruns incurred by Nipigon LNG during the term."

Questions

a) The Application states that the Utility[1] is not exposed to any capital overruns associated with the proposed Nipigon LNG infrastructure. What mitigation measures have the Municipalities planned in the event Nipigon LNG LP ("**Nipigon LNG**") incurs cost overruns and is unable to obtain additional financing to complete to construction?

b) In the event that after the municipal gas distribution systems commence operations, Nipigon LNG ceases operations for any reason, what mitigation measures have the Municipalities, on behalf of the Utility, planned to maintain gas supply service to its customers.

Certarus-2

Ref: Exhibit A, Tab 13, Schedule 1, pages 10-14

Exhibit A, Tab 2, Schedule 1, pages 2 to page 3

Preamble

"Several gas supply alternatives were reviewed according to their cost effectiveness, reliability (which includes security of supply) and support for public policy. They included a lateral pipeline from the TransCanada Mainline, LNG and compressed natural gas ("CNG"). The preferred supply option is LNG from a new plant near Nipigon." (Exhibit A, Tab 2, page 2, line 8 to page 3, line 2)

[1] The Application defines the "Utility" as the local gas distributor that the Municipalities have resolved to incorporate, finance, and resource for the distribution of natural gas within the Municipalities. Certarus Ltd. adopts this definition of "Utility" for the purpose of these Interrogatories.

Question

a) Please provide all studies, copies of other source documents, worksheets and any other materials relied upon with respect to the basis for assumptions and the analysis of CNG as a supply alternative.

Certarus-3

Ref: Exhibit A, Tab 13, Schedule 1, pages 10 and 11

Preamble

"The average landed gas supply cost of the proposed Contract is less than or competitive with costs for alternate natural gas supply. Nipigon LNG and the Corporation have considered other options of providing the requisite natural gas services to meet the demands of the North Shore Municipalities. These options include LNG service, compressed natural gas service and a lateral pipeline. A landed cost analysis demonstrates that the LNG Services contemplated in the proposed Contract is the most beneficial and cost-effective option." (page 10, line 18 to page 11, line 2)

Question

a) The Application states Nipigon LNG and the Corporation have considered alternative options to LNG for providing natural gas service. Please confirm that the Corporation did not conduct its own analysis, independent of Nipigon LNG. If the Corporation conducted its own analysis, please provide that analysis.

Certarus-4

Ref: Exhibit A, Tab 8, Schedule 1, Attachment 1
[Initial Gas Supply Plan - North Shore Municipalities, Elenchus Research Associates Inc. (July 2019)]

Questions

a) Please confirm that the report prepared by Elenchus Research Associates Inc. ("**Elenchus**") dated July 2019 does not include any analysis or even mention CNG.

b) Please explain whether the fact the report did not assess CNG as part of its Supply Option Analysis (section 2.7), and exclusively focused on LNG supply even in terms of back up facilities (*i.e.* section 2.7.2, section 2.8.4.2, Appendix 2 Risk Analysis part 3a "Extend Plant failure" and part 4 "Weather-related road closure"), was a deliberate decision on the part of the authors or was the scope of the Elenchus study dictated by

the Corporation. If Elenchus decided not to assess CNG options, please provide its rationale for failing to do so.

c) Please provide the retainer agreement for the study conducted by Elenchus (with commercial details such as rates and prices redacted) so that any limitations on the scope of its work can be clearly identified.

d) Was Elenchus retained and instructed by the Corporation, Nipigon LNG or both?

Certarus-5

Ref: Exhibit A, Tab 4, Schedule 1, Page 18

Preamble

"Natural gas demand from Residential and General Service customers are seasonal in nature, with significant “peaks” in the winter. Natural gas distribution companies must plan to meet customers’ needs during the peak demand periods, and as a result may only utilize system capacity 30% to 35% of the time.

It is intended that the upstream gas resources (i.e., LNG capacity and upstream pipeline capacity) would be procured to meet the peak day requirements for the residential and General Service customers. The majority of capacity not utilized by the residential and General Service customers would be sold and delivered to the industrial market in order to minimize the total rate for all customer classes. This approach requires the industrial market to be connected to the distribution system and to utilize other fuel types when the supply of natural gas is less than total demand." (line 1 to line 11)

Questions

a) The Application states that the supply of natural gas may be less than total demand at times, and in the event that occurs industrial markets would not have access to natural gas. Please explain whether the source of natural gas the applicant considered when making this statement was limited to Nipigon LNG and why supplemental sources such as CNG were not also considered.

b) Please explain if the Municipalities or the Utility, have planned for "open access" to its system to facilitate alternate natural gas supply so as to avoid the curtailment of industrial markets. If so, please provide diagrams indicating the potential locations and approximate costs for the construction of interconnections with each gas distribution system separate and apart from the LNG Depot proposed in each location. If not, please explain why not.

c) Please explain what arrangements the Corporation considered to ensure reliable gas supplies to its utility customers in the event of prolonged outages of re-gasified LNG to each municipal distribution system in summer and in winter conditions.

d) Please advise what standby fuel capability residential, small commercial and institutional (including but not limited to schools, hospitals etc.) customers are expected to have available in the event of a prolonged failure of gas supply from Nipigon LNG

e) Please provide the curtailment priority for each customer or service offered by each of the municipal gas distribution systems in the event the gas supplies from Nipigon LNG are not available.

Certarus-6

Ref: Exhibit A, Tab 4, Schedule 1, Attachment 1 at page 4
[Residential Telephone Survey - North Shore Community NG Forecasting, Innovative Research Group Inc. (June 2016)]

Preamble

"4. Cost is a significant factor:

- It is a primary reason for not converting and the main deciding factor for those who aren't sure."

Questions

a) Please confirm that the referenced research report notes cost is a primary reason, and for some the main factor, in deciding to convert.

b) Please provide an assessment of conversion rates assuming overall rate reductions (separating out distribution charge and commodity cost of gas) of 10%, 15%, 20% and 25% relative to the Nipigon LNG price assumed.

Certarus-7

Ref: Exhibit A, Tab 13, Schedule 1, page 3

Preamble

"The distribution pipeline will also be connected to a local LNG depot providing the natural gas."

Ref: Exhibit A, Tab 5, Schedule 1, page 1

Preamble

"The gas is then sent through a conventional underground distribution system at the desired distribution temperature and pressure to homes and businesses in the service area. A draft LNG Depot layout is included. (see Tab 13, Schedule 1, Attachment 3).

The LNG Depots will be located on land leased or owned by the Utility identified in Tab 6, either pursuant to a lease or agreement of purchase and sale, with road access and utility services provided by the Utility."

Questions

a) Please confirm if the Corporation intended that each municipal distribution system should be "open access", with the distribution pipeline able to connect to another source of natural gas supply in addition to the source of gas provided by Nipigon LNG. If not, why not?

b) Please confirm that the LNG Depot itself will be owned by the gas supplier Nipigon LNG and would be a propriety asset rather than part of the "open access" municipal gas distribution system.

c) If the Corporation is unable to confirm its initial intention to operate the municipal gas distribution systems on an "open access" basis, is it now prepared to make its system open access so as to avoid a gas supply monopoly and to enhance reliability of gas service to its customers by providing an additional connection to each municipal gas distribution system for alternative suppliers on terms similar to what it has provided to Nipigon LNG?

Certarus-8

Ref: Exhibit A, Tab 7, Schedule 3, Page 1

Preamble

"The Project is proposed to be in service for the 2020-2021 heating season." (line 9)

Ref: Exhibit A, Tab 13, Schedule 1, Page 5

Preamble

"The anticipated commercial operation date for provision of the LNG Services to the Utility is October 1, 2020 (the “Commercial Operation Date”)." (lines 18 and 19)

Questions

a) Has Nipigon LNG provided the Corporation an updated anticipated commercial operation date for the LNG Services since the Corporation's Application was filed in August 2018? If yes, please provide the updated in-service date.

b) In light of current Application timing please provide an up-to-date critical path analysis separately for each municipal gas distribution system, for all required LNG facilities and for any TC Energy required facilities detailing the key approval, construction, commissioning and in-service dates assumed by the Corporation for each component of the overall project. Please include a discussion of the critical path associated with all electric power facilities required to operate each one of the LNG facilities.

c) Please describe the Utility's mitigation plan if Nipigon LNG is unable to deliver natural gas, due to construction delays or otherwise, to complete commissioning or meet the Utility's needs for the 2020-2021 heating season?

d) In the event Nipigon LNG is delayed or unable to proceed, please advise whether the Corporation would be prepared to proceed to construct each municipal gas distribution system to commence service October 1, 2020 provided adequate long term CNG supplies can be contracted to be available at interconnection points to be added to each gas distribution system upon commercial terms no more onerous to the Corporation than those agreed to with Nipigon LNG. Please assume no new facilities are required by the CNG supplier or TC Energy to supply the required volumes; that no backstopping of incremental CNG costs is required; and that any firm gas supply arrangement would be for the same 10 year term as the Nipigon LNG contract, or for some longer or shorter term as desired by the Utility.

e) Why should the utility customers of each municipal gas utility be required to bear the costs of stand-by LNG Depot capacity for 5-6 day outage protection if alternative gas supplies are available from existing facilities at competitive prices?

f) Are the utility customers expected to pay the cost of the electric power required for Nipigon LNG's liquefaction and vapourization activities?

g) Did the Corporation undertake an assessment of LNG supply reliability risk associated with the construction and operation of greenfield LNG facilities apart from the transportation risk of LNG trucks travelling between the liquefaction terminal and the individual LNG depots? If so, please provide that analysis. If not, why not?

h) Did the Corporation assess the methane emissions from venting LNG during summer and winter months at the LNG Depot re-gasification facilities? If so, please indicate whether they comply with federal or provincial standards to limit fugitive methane emissions. If no, why not and how might they affect the Nipigon LNG critical path and the planned gas distribution in-service date of October 1, 2020?

i) Do any provisions of any agreements with Nipigon LNG or any potential financing term sheets or financing agreements contain restrictions on gas supply competition for the requirements of each individual gas distribution system or their customers? If so, please explain the status of any related application to the federal competition authorities and how any potential competition review or approvals might affect the critical paths of Nipigon LNG and of each municipal gas distribution system?

j) What was the assumed TC Energy service (STFT, IT, FT etc.) and toll for delivery of the natural gas to Nipigon LNG?

Certarus-9

Ref: Exhibit A, Tab 8, Schedule 1, Attachment 1, page 31

Preamble

Certarus Ltd. would like to better understand the Corporation and the Utility's plans for transportation of gas upstream of the Nipigon LNG facility

Questions

a) Please confirm that the Utility will have responsibility for acquisition of the gas supply and transportation for the gas ultimately to be consumed and paid for by its customers.

b) Please advise the status of negotiations with TC Energy regarding firm transportation service including but not limited to tolls, type of service, diversion rights, term and likelihood of timely availability of service commencement October 1, 2020.

c) Please confirm that short term firm services and IT on the TC Energy Mainline are at biddable prices and whether the Utility intends to rely upon these services to provide the gas supply required by its customers.

d) Please confirm that long term firm service requests on TC Energy's Mainline that trigger the construction of new facilities require a minimum term of 15 years.

e) Please advise whether the Corporation or the Utility are aware of any upcoming TC Energy Open Seasons that may affect the availability of capacity to its intended interconnection point or which might trigger a term-up requirement for any firm service contract it may elect to enter into.

f) Please advise whether the request for TC Energy Mainline service is being made in the name of the Corporation, the Utility or Nipigon LNG.

g) What cost of TC Energy metering and interconnection were assumed by the Corporation or the Utility; what is the status of negotiations with TC Energy regarding payment of those costs; and how will those costs be recovered from customers (e.g.,

embedded in utility distribution charges; in the commodity cost of gas; in the Nipigon LNG charge; etc.)?

h) Please provide drawings of the interconnection with the TC Energy Mainline and the Nipigon LNG facilities indicating whether the meter and interconnection facilities will be located on land owned by TC Energy, Nipigon LNG, the Municipalities, or the Utility, and whether third parties might have access to those interconnection facilities.

i) Please explain how the Utility will secure and control access to the TC Energy interconnect in the event, for any reason, Nipigon LNG is no longer able to provide service, the Nipigon LNG contract expires, or Nipigon LNG ceases to exist.

j) Please indicate whether the Utility will have the right at any time during the Nipigon LNG contract term or after its expiry to divert gas to other TC Energy Mainline delivery points in the WDA or NDA for ultimate delivery to the new municipal gas systems by means of CNG, LNG or otherwise.

k) Please indicate whether there are any restrictions set forth in any Nipigon LNG agreements or financing agreements on the Utility's ability to take delivery of gas from TC Energy at other delivery points than the new interconnection referenced above.

l) Assuming the transportation, interconnection and meter costs are the responsibility of the Utility, which costs will be recovered in rates from its customers, how will the Utility ensure "open access" for third party gas suppliers to access that TC Energy interconnection and to receive gas delivered by means of the Utility's TC transportation agreement?

m) Will the Utility commit to the management of its rights on the TC Energy Mainline to deliver gas to alternate delivery points provided the costs of further delivery to its customers can be demonstrated to be the best cost alternative available or where they could be otherwise justified in the public interest?

Certarus-10

Ref: Exhibit A, Tab 8, Schedule 1, Attachment 1, pages 8-9
[Initial Gas Supply Plan - North Shore Municipalities, Elenchus Research Associates Inc. (July 2019)]

Preamble

"Since this is a new distribution area, it is recognized that the demand for gas could occur in a different pattern than what has been assumed from the surveys. The Plan therefore needs to be sufficiently flexible to manage variations in demand while still meeting the needs of the customers in a cost-effective and reliable manner.

To the extent required, additional upstream options will be assessed, and new arrangements will be put in place that maintain the cost- effectiveness–reliability–public policy balance."

Questions

a) Please confirm if the Utility agrees with the assertion made by Elenchus that demand for gas could occur in a different pattern than assumed, and that additional upstream options may need to be put in place.

b) Did Elenchus or Innovative Research consider a slower natural gas adoption cycle and the potential impact on prices borne by customers, on the owners of the gas distribution systems or on the financing arrangements required?

c) Was Elenchus or Innovative Research asked to consider, or did they otherwise consider, the reliability risk of a greenfield LNG supply option or discuss with potential customers the cost of back up supply arrangements for their space heating requirements in the event an LNG Depot is unable to provide gas supplies for a prolonged period particularly in the winter months? If so, please provide that analysis or a report of any such discussions. If not, why not?

d) Were back-up supply costs included in the analysis of the expected conversion rate?

Certarus-11

Ref: Exhibit A, Tab 13, Schedule 1, Page 1

Preamble

"Nipigon LNG is a transformative and regionally significant initiative for the economic development of northern Ontario. Project infrastructure will help sustain existing industrial operations, accelerate new development and provide a platform to extend natural gas service…" (lines 13 – 15)

Question

a) Does the Corporation agree that Certarus Ltd.'s two built and de-risked CNG terminals in Northern Ontario (Timmins and Red Rock), of which the Timmins terminal is already reliably supplying multiple industrial customers, is a "transformative and regionally significant initiative for the economic development of northern Ontario" and "provide[s] a platform to extend natural gas service" in the region?

Certarus-12

Ref: Exhibit A, Tab 13, Schedule 1, Page 2

Preamble

"Without pre-approval of the cost consequences of the proposed Contract, the Utility's investors would not commit the capital to finance the Utility, and, in turn, Nipigon LNG could not commit to build and operate the LNG Depots to supply the Utility with natural gas. As a result, the residents and businesses of the Municipalities would be exposed to the sustained impacts of higher-cost energy." (lines 21 – 25)

Question

a) What is the Utility's mitigation plan should Nipigon LNG be unable to commit to build and operate the LNG Depots as proposed, for reason of insufficient financing or otherwise?

Certarus-13

Ref: Exhibit A, Tab 13, Schedule 1, Page 7

Preamble

"The Utility will be required to provide and maintain evidence of satisfactory creditworthiness and provide the requisite financial assurances during the term of the proposed Contract, and the Utility may be required to execute a financial backstopping agreement, in form and substance reasonably acceptable to Nipigon LNG upon execution of the proposed Contract.

Nipigon LNG is under no obligation to order any equipment, materials or labour necessary for the construction of the LNG Depots prior to the execution of the proposed Contract." (lines 7 – 12)

Questions

a) Please confirm that executing a financial backstopping agreement that is acceptable to Nipigon LNG does not preclude competitive natural gas supply options.

b) Please describe the Utility's mitigation plan if Nipigon LNG does not execute the Contract and order any materials, equipment or labour.

c) In terms of the Project's critical path, when must Nipigon LNG order any material, equipment or labour in order to meet the October 1, 2020 in service date?

d) Please describe any evidence of credit worthiness or financial assurance the Utility requires from Nipigon LNG or any other potential competitive supply option.

e) Are the municipal gas distributors prepared to backstop the costs of competitive gas suppliers as well? If not, please comment on whether this constitutes an undue preference for one gas supplier over another which would be contrary to the regulatory policies of the Board?

f) How do the municipal gas distributors expect to recover any costs incurred in connection with the commitments to Nipigon LNG referred to above?

Certarus-14

Ref: Exhibit A, Tab 13, Schedule 1, page 11

Preamble

"At present, there is no natural gas supply or distribution on the North Shore of Lake Superior…" (line 3)

Question

a) Does the Corporation agree that the above statement no longer remains accurate in the circumstances today? If not, why not?

Certarus-15

Ref: Exhibit A, Tab 13, Schedule 1, page 15

Preamble

"Furthermore, the contemplated project is a stand-alone greenfield development that requires a sizable investment in new natural gas infrastructure to provide a relatively small quantity of natural gas. While the proposed Contract represents the entire portion of the Utility's overall gas supply portfolio, it is not unreasonable that the Utility would rely on a single contract during the initial term of the proposed Contract." (lines 3 – 7)

Questions

a) Please explain why the Utility has chosen to rely upon a single supply contract, rather than having multiple competitive supply options in order to achieve the most economical rates and favourable contract terms?

b) Has the Utility or its financial advisors considered the technology risk of a single greenfield LNG gas supply option and potential means of mitigating that risk? If so, please provide that analysis. If not, why not?

c) Will the Utility require its customers to pay "in all events" the distribution costs as well as the gas supply costs of Nipigon LNG throughout any supply disruption? How long will utility customers be expected to bear those costs while not receiving gas supply?

d) Are there any restrictions on the Utility's ability to provide interconnection facilities for alternative or supplemental gas suppliers as part of the municipal gas distribution systems?

e) What would be the approximate cost of providing interconnection facilities for CNG suppliers?

f) In order to enhance supply reliability and to provide competitive supply options for its customers, is the Utility prepared to include CNG interconnection facilities in its applied for facilities design to ensure two potential suppliers can access each new gas distribution system by October 1, 2020? If not, why not?

Certarus-16

Ref: Exhibit A, Tab 13, Schedule 1, page 15

Preamble

"As with any greenfield natural gas project, actual attachments and demand may not match forecasts over the term of the proposed Contract and the discrepancy may be material, thereby creating financial risk to customers." (lines 12 – 14)

Questions

a) Please advise what mitigation the Utility considered to reduce the financial risk borne by its customers in order to limit the costs they must bear in the event forecasted demand does not match forecasted levels? Will customers be responsible for all gas distribution costs on their bills separately from the costs incurred for gas supply?

b) Will customers be able to choose an alternative gas supplier at any point over the term of the Nipigon LNG contract?

c) What is the Utility prepared to do to reduce the high minimum payments under the Nipigon LNG contract in the event that:

i. actual and forecast demand fail to match; or

ii. cost overruns or delayed service at one or more of Nipigon LNG's facilities cause distribution costs (AFUDC etc.) to increase?

d) Are the Utility's financial advisers also advising Nipigon LNG regarding the risks and financeability of its own project?

e) Are the Utility and the Corporation at arms-length from Nipigon LNG and its owners?

f) Would the availability of alternative gas supplies by means of new interconnection facilities on each municipal gas distribution system reduce the risk of the investment in those gas distribution facilities (separate from Nipigon LNG)?

Certarus-17

Ref: Exhibit A, Tab 13, Schedule 1, page 16

Preamble

"Similarly, if the Utility expands faster than projected and lower priced gas supply and transportation options became available at some point during the proposed Contract, the Utility will have flexibility to take advantage of those opportunities by adding that capacity to its supply portfolio." (lines 1 – 4)

Question

a) Please describe what arrangements the Utility is planning to take immediate advantage of lower-priced gas supply from the competitive gas supply offerings of Certarus Ltd. or other providers?

b) What capacity limitations exist under the proposed distribution system design that might limit the ability to serve higher than expected demand? Please provide order of magnitude daily levels of incremental demand that the existing facilities design could reasonably handle.

c) Please describe the plans made for interconnection infrastructure for alternative LNG or CNG supply and the timing of the availability of such facilities.

Certarus-18

Ref: Exhibit A, Tab 13, Schedule 1, page 17

Preamble

"The requested pre-approval will allow the Corporation to proceed confidently with this opportunity and for residents and businesses of the Municipalities to obtain the resulting benefits of natural gas service." (lines 18 – 20)

Question

a) Would the immediate availability of alternate or back-up gas supplies at an additional point of interconnection to each municipal gas distribution system increase the confidence of the Corporation and its customers in converting to natural gas service ? If not, why not.

Certarus-19

Ref: Exhibit A, Tab 13, Schedule 1, Attachment 5
[LNG Services Agreement]

Exhibit A, Tab 13, Schedule 1, Attachment 5, page 35
[LNG Services Agreement, SCHEDULE A - INTERRUPTION OF SERVICE]

Questions

a) Please advise if the agreement or any other agreement with Nipigon LNG or the Utility's financial advisers prevents the Utility from providing "open access" to competitive natural gas supply options at the outset, including supporting commissioning or supplying natural gas in the event of supply interruptions or in any circumstances where Nipigon LNG might otherwise be unable to deliver natural gas.

b) Paragraph 3.1(a)(iv) of the LNG Services Agreement requires the Utility to provide to Nipigon LNG the Customer Financial Security within 30 days of signing. Please describe the Utility's mitigation if it is unable to, or determines it is economically unreasonable or unfavourable, to provide such financial security?

c) Paragraph 3.1(a)(v) states that Nipigon LNG shall make a positive final investment decision, in its sole discretion, to construct the LNG facilities by some indeterminate date. Please describe the Utility's mitigation plan if Nipigon LNG decides in its sole discretion to not make the requisite investment decision due to inability to obtain financing or any other reason or that Nipigon LNG is materially delayed ?

d) Paragraph 4.2 states that Nipigon LNG may offer additional LNG service above the MaxDQ to the Customer. Please advise if competitive natural gas supply options can provide service to the Utility or to its customers. If not, why not. If yes, please provide the proposed terms and conditions or other proposed agreement/term sheet applicable for the provision of such competitive service.

e) Paragraph 5.3 references SCHEDULE B, which contains pressure and temperature specifications for gas received from Nipigon LNG. Please advise if similar information is available now for other competitive supply options from LNG or CNG providers.

f) SCHEDULE A – Interruption of Services (Exhibit A, Tab 13, Schedule 1, Attachment 5, page 35) identifies a host of reasons why Nipigon LNG may discontinue or interrupt service, including "(d) in order to make repairs or improvements to any part of Nipigon LNG's pre-treatment, liquefaction, distribution, storage, control or loading systems,". Please advise as follows:

   a. the Utility's mitigation strategy if Nipigon LNG chooses to interrupt service for an extended period to make extended repairs or improvements to its equipment.

   b. what penalties, if any, Nipigon LNG could experience under the terms of the Contract for lack of service.

   c. whether the Utility would provide similar favourable terms to any other competitive suppler of natural gas with which the Utility contracts.

   d. whether the Utility's customers would receive any relief from the Nipigon LNG costs during periods where its gas supply service is interrupted or curtailed. If not, why not?

   e. how the Utility will proration available gas supplies to its customers under circumstances where Nipigon LNG is unable to provide gas supply.