



450 – 1 Street SW
Calgary, Alberta T2P 5H1

Tel: (403) 920-7165
Fax: (403) 920-2451
Email: jim_bartlett@tcenergy.com

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

Attention: Ms. Christine E. Long, Board Secretary

Dear Ms. Long:

**Re: Enbridge Gas Inc. (EGI)
OEB File No. EB-2019-0218 - 2021 Sarnia Industrial Line Reinforcement Project
TransCanada PipeLines Limited (TCPL) Interrogatories**

Enclosed are the interrogatories of TCPL. Should you have any questions, please contact the undersigned.

Yours truly,
TransCanada PipeLines Limited

Original signed by

Jim Bartlett
Manager, Regulatory Research and Analysis
Canadian Natural Gas Pipelines

cc: Adam Stiers, Enbridge Gas Inc.
Guri Pannu, Enbridge Gas Inc.

Enclosure

Number: TCPL-EGI-1

- Reference:**
- i) Exhibit B, Tab 1, Schedule 1, Page 3 of 6, Paragraph 7.
 - ii) Exhibit B, Tab 1, Schedule 2, Pages 2 to 4 of 17, Paragraphs 4 to 11.
 - iii) Exhibit B, Tab 1, Schedule 2, Pages 9 to 16 of 17, Paragraphs 24 to 47.

Preamble: In Reference i), EGI refers to Union's 2014 Sarnia Expansion Pipeline Project Application (EB-2014-0333). The EB-2014-0333 filing contains information and a number of graphs that are not included in EGI's EB-2019-0218 Application. TCPL requires additional information to understand the sources of supply that meet the requirements of the Sarnia Industrial Line (SIL) system.

In Reference ii), EGI discusses the existing SIL facilities and several pipelines that connect either the Dawn Hub or other storage pools to the SIL system.

In Reference iii), EGI discusses gas supply for the SIL system and states that the Sarnia market is primarily supplied through a combination of four directly connected third-party pipelines as well as through EGI's own pipelines. The four pipeline systems include 1) Great Lakes Canada (GLC) / Great Lakes Gas Transmission (GLGT), 2) Vector, 3) DTE Energy / St. Clair Pipelines, and 4) Bluewater Gas Storage / Bluewater Pipeline. A fifth pipeline, the Niagara Gas Transmission Limited LINK Pipeline is also mentioned.

- Request:**
- a) Regarding Reference ii), please provide the current maximum capacity on each of the following pipelines and indicate whether EGI expects the maximum capacity to change after the completion of EGI's Project in November 2021. If the maximum capacity changes depending on the season, please indicate the capacity for each season.

Pipeline	Current Maximum Capacity (TJ/d)	Expected Capacity Post Project Completion (TJ/d)
NPS 12 SIL		
NPS 24 St. Clair Line		
NPS 20 Bluewater Line		

NPS 10 from Dow Valve Site to Churchill Road Station		
NPS 16 from Novacor Corunna to Dow Valve Site		
NPS 20 from Courtright to Novacor Corunna		
NPS 20 from Novacor Corunna to Dow Valve Site		
NPS 20 from Payne Storage to Novacor Corunna		
NPS 8 Dawn Kimball Line		
NPS 20 Payne Storage Line		
NPS 20 Payne to Sarnia Line		
NPS 10 Payne Kimball Line		
NPS 24 Bickford Storage Line		
NPS 10 Dow Storage Pool Line		

- b) Regarding Reference iii), please provide the current maximum capacity at each of the following pipeline interconnects for delivery of gas supply onto the SIL system and indicate whether EGI expects the maximum capacity to change after the completion of EGI's Project in November 2021. If the maximum capacity changes depending on the season, please indicate the capacity for each season.

Pipeline Interconnection	Current Maximum Capacity to Supply SIL System (TJ/d)	Expected Capacity Post Project Completion to Supply SIL System (TJ/d)
GLC at Great Lakes Courtright		

Vector at Vector Courtright		
Total Courtright northbound capacity		
St. Clair River Crossing / NPS 24 Pipeline at St. Clair Pipeline Station		
Bluewater Pipeline at the Bluewater Interconnect		
Niagara Gas LINK Pipeline at EGI Corunna Station		

- c) Regarding Reference i), please provide the Average Seasonal SIL System Supply by Source in TJ/d by reproducing Figure 2-3 in the EB-2014-0333 Application (Section 2, Page 12 of 14) and extending the timeframe up to Winter 2021/2022 if EGI has a forecast of these quantities after completion of EGI’s Project in November 2021. If a forecast is not available, please reproduce the figure up to Winter 2019/2020. Please also include a numerical table corresponding to the data in the graph that provides the seasonal average supply quantities by Source for the same time periods.
- d) Regarding Reference i), please reproduce Figure 4-1 (Net Daily GLGT/GLC Flows to EGI’s System), Figure 4-2 (Daily Vector Pipeline Deliveries to EGI’s System), Figure 4-3 (Daily MichCon/DTE/St. Clair Flows to EGI’s System), Figure 4-4 (Daily BGS/Bluewater Flows to EGI’s System), and Figure 4-5 (Combined Flows – Historical Supply Available to Serve SIL System Demand) in the EB-2014-0333 Application up to currently available data. Please also provide a separate graph illustrating Daily Flows into the SIL system from EGI’s own facilities (discussed in Reference iii) paragraphs 40 to 47) for the same time period.
- e) Please comment on whether EGI is concerned about future supply risk for the SIL system and the degree to which EGI controls the supply to serve the SIL system. If concerned, please comment on the future mitigation measures EGI plans to implement to mitigate these concerns. If not concerned, please explain why not.

Number: TCPL-EGI-2

- Reference:**
- i) Exhibit B, Tab 1, Schedule 2, Page 15 of 17, Paragraph 44.
 - ii) Exhibit B, Tab 1, Schedule 2, Page 10 of 17, Paragraphs 26 to 28.
 - iii) Exhibit B, Tab 1, Schedule 2, Page 12 of 17, Paragraph 32.

Preamble:

In Reference i), EGI states that the majority of customers (approximately 90%) served in the Sarnia market have Direct Purchase contracts with gas supply obligated to be delivered to Dawn. There is insufficient pipeline capacity to transport Direct Purchase customers' gas supply from the Dawn Hub to the SIL system. Instead of transporting Direct Purchase customers' gas supply from the Dawn Hub to the SIL system, Enbridge Gas diverts firm system supply or third-party gas flowing on upstream pipelines such as Vector, GLC, BGS and DTE into the Sarnia market and uses Direct Purchase customers' gas supply at the Dawn Hub to replace diverted supply.

In Reference ii), EGI discusses the Great Lakes Canada (GLC) pipeline that directly connects to the SIL system at Courtright and also directly connects to the Dawn Hub. EGI states that it has the ability to direct up to 0.4 PJ/d of supply from the GLC system into the SIL system at Great Lakes Courtright. EGI has contracted for firm transportation (21 TJ/d starting November 1, 2019) on the GLGT/GLC system to deliver natural gas to the Union South West Delivery Area (SWDA) which includes the SIL system at Great Lakes Courtright. While there are times when larger volumes of gas are flowing past Great Lakes Courtright, EGI states that it has no direct control over these volumes.

In Reference iii), EGI refers to its 269 TJ/d of firm long-term transportation capacity on Vector to Dawn. EGI states that it is able to utilize its transportation contract to deliver natural gas to Vector Courtright and that it can also use its transportation contract to deliver an equivalent amount of gas from the Dawn Hub to the SIL system at Vector Courtright on an interruptible basis.

- Request:**
- a) Is it the responsibility of EGI or Sarnia market Direct Purchase customers to supply natural gas to the SIL system at the interconnection locations with upstream pipelines (e.g. Courtright)? Please explain.

- b) Do Sarnia market customers have the ability to direct supply themselves onto the SIL system at the interconnection locations with upstream pipelines (e.g. Courtright)? Why or why not?
- c) Please explain why Sarnia market customers with Direct Purchase contracts are obligated to deliver their gas supply to Dawn. What is the purpose and benefit of this requirement?
- d) Does EGI have any control over where Direct Purchase customers in the Sarnia market purchase their upstream transportation from? Please explain.
- e) Does EGI require Direct Purchase customers in the Sarnia market to purchase firm upstream transportation for the obligated gas supply deliveries to Dawn? If so, please explain why this requirement is necessary. If not, please explain why firm service is not necessary.
- f) Are Direct Purchase customers in the Sarnia market required to nominate 100% of their daily contract demand quantity to Dawn each day or are they required only to nominate a quantity equal to their expected consumption level on the day? Please explain.
- g) Please confirm that the TCPL Mainline also provides service for its shippers to the Union South West Delivery Area (SWDA) which includes the Sarnia / Great Lakes Courtright meter station that connects to the SIL system. If not confirmed, please explain.
- h) Please provide the historical pressure received at Great Lakes Courtright since 2015.
- i) Please comment on EGI's expectations for its ability to direct supply onto the SIL system at Great Lakes Courtright in the future. For example, are there actions that EGI would need to undertake, or facilities that would be required on the SIL system, to accommodate increased gas supply onto the SIL system at Great Lakes Courtright?
- j) Please confirm whether Vector Courtright is an eligible delivery location for EGI's Vector contracts to Dawn. If not confirmed, please explain how EGI is able to utilize its Vector transportation contract to deliver natural gas to Vector Courtright.
- k) Please confirm whether EGI is subject to an incremental toll or charge from Vector for its ability to move an equivalent amount of gas from the Dawn Hub to the SIL system at Vector Courtright on an

interruptible basis. If confirmed, please explain the structure of the toll or charge, and the annual dollar amounts incurred since entering into the applicable Vector contracts.

- l) Please provide the annual quantity of gas that EGI has moved from the Dawn Hub to Vector Courtright on an interruptible basis since entering into the applicable Vector contracts.

- m) Does EGI have an ability to move gas from the Dawn Hub to the SIL system at Great Lakes Courtright on either a firm or interruptible basis? Please explain.

Number: TCPL-EGI-3

Reference: i) Exhibit B, Tab 1, Schedule 2, Page 5 of 17, Paragraph 13.
ii) Exhibit B, Tab 1, Schedule 2, Attachment 1.

Preamble: In Reference i), EGI states that the majority (approximately 90%) of Sarnia market demand is consumed by contract rate industrial customers (mainly Rate T1 and Rate T2) such as power generators and large industrial customers. Residential and small commercial/industrial customers constitute the remainder of Sarnia market demand.

In Reference ii), EGI provides a redacted copy of NOVA's T2 Storage and Transportation Carriage Service contract.

Request:

a) Please discuss in general the types of services EGI provides to its Sarnia market customers and whether these services include bundled gas supply, upstream pipeline transportation, distribution, and/or storage service, or whether these components are or can be obtained by Sarnia market customers separately.

b) Please explain the features and characteristics of Rate T1 and Rate T2 contracts, including the following:

- Minimum contract term when no new EGI facilities are required to serve the customer
- Minimum contract term when new EGI facilities are required to be constructed to serve the customer
- Service priority (firm and/or interruptible transportation entitlements)
- Tolling structure (demand / commodity)
- Storage parameters (e.g. storage capacity entitlements, maximum injection / withdrawal rights, tolls paid for injection / withdrawals, etc.)
- Firm Hourly Quantity entitlements
- Maximum Hourly Quantity Entitlements
- Minimum Annual Volume requirement, if any
- Renewal right provisions
- Differences between obligated and non-obligated deliveries
- How customers access Rate T1 and T2 capacity, including the capacity allocation process used by EGI to award capacity
- Any other applicable service characteristics or flexibility features

- c) Please list all of the eligible receipt points for which Rate T1 and Rate T2 customers may contract to obtain service on the SIL system.
- d) Please list all of the eligible delivery points for which Rate T1 and Rate T2 customers may contract for delivery on the SIL system.

Number: TCPL-EGI-4

- Reference:**
- i) Exhibit B, Tab 1, Schedule 2, Page 5 of 17, Paragraph 13.
 - ii) Exhibit B, Tab 1, Schedule 2, Page 8 of 17, Paragraph 22.
 - iii) Exhibit B, Tab 1, Schedule 2, Page 13 of 17, Paragraph 36.
 - iv) Exhibit B, Tab 1, Schedule 2, Pages 13 to 14 of 17, Paragraphs 38 to 39.

Preamble: In Reference i), EGI states that the majority (approximately 90%) of Sarnia market demand is consumed by contract rate industrial customers (mainly Rate T1 and Rate T2) such as power generators and large industrial customers. Residential and small commercial/industrial customers constitute the remainder of Sarnia market demand.

In Reference ii), EGI provides a graph of SIL system Design Day demand from 1998/99 to 2022/23.

In Reference iii), EGI states that it contracts for 158 TJ/d of firm St. Clair to Dawn transportation associated with a NEXUS Pipeline contract that must be consumed in the Sarnia market.

In Reference iv), EGI states that all of the natural gas delivered from BGS is consumed within the Sarnia market. EGI further states that flow from Michigan to Ontario via BGS is influenced by the quantity of services that BGS contracts that include Dawn Hub withdrawals and that historically, flow from Michigan to the Dawn Hub via BGS has been volatile based on market conditions. BGS has a contract for 123 TJ/d of winter only, firm C1 transportation capacity from the Bluewater Interconnect to the Dawn Hub which is used to provide storage services.

- Request:**
- a) Please provide the design day demands separately for each of the residential, commercial and industrial customer classes located in the Sarnia market for the same time period and graphical format as depicted in Figure 2-2 in Reference ii).
 - b) Please explain why EGI's 158 TJ/d of firm St. Clair to Dawn transportation associated with a NEXUS Pipeline contract "must be consumed in the Sarnia market."

- c) Please explain why all of the natural gas delivered from BGS is consumed within the Sarnia market.

- d) Please describe the service that BGS holds with EGI and how that service is used by BGS to provide storage services to its customers. Please also confirm whether the 123 TJ/d C1 transportation capacity held by BGS from the Bluewater Interconnect to the Dawn Hub also provides BGS with Dawn Hub withdrawals. If not confirmed, please explain the reference to Dawn Hub withdrawals.