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VIA RESS, EMAIL and COURIER

Christine Long
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: Enbridge Gas Inc. (“Enbridge Gas”)
Ontario Energy Board (“Board”) File: EB-2019-0183
Owen Sound Reinforcement Project Leave to Construct & Rate M17
Application – Interrogatories of Enbridge Gas**

In accordance with Procedural Order No. 2, please find enclosed Enbridge Gas’s interrogatories with respect to the evidence of EPCOR Natural Gas Limited Partnership.

Please contact the undersigned if you have any questions.

Sincerely,

(Original Signed)

Brandon Ott
Technical Manager, Regulatory Applications

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B;

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an Order or Orders approving a new firm transportation service for gas distributors under the rate M17 rate class, effective December 1, 2019;

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an Order or Orders modifying the applicability of the existing Rate M9 and Rate T3 rate schedules for existing gas distributors;

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in in the Municipality of West Grey and the Township of Chatsworth;

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an Order or Orders approving the form of various land agreements.

**WRITTEN INTERROGATORIES OF ENBRIDGE GAS INC. TO
EPCOR NATURAL GAS LIMITED PARTNERSHIP (ENGLP)**

Enbridge 1

Reference: ENGLP Evidence, page 6, lines 12-13

Question:

Please provide the date that ENGLP expects to be in-service and ready to accept gas from Enbridge Gas Inc. ("Enbridge Gas") at the Dornoch meter station.

Enbridge 2

Reference: ENGLP Evidence, page 22, lines 3-6;
EB-2018-0264, Exhibit 2, Tab 1, Schedule 1, page 62
ENGLP Evidence, page 22, lines 7-12

Preamble: Enbridge Gas was and is of the understanding that ENGLP's preference is to pay for the cost of the Dornoch station upfront through a contribution in aid of construction (CIAC) as opposed to embedding those costs within the M17 monthly customer charge.

Question:

- a) Please confirm Enbridge Gas provided ENGLP with the option to either include the capital costs the Dornoch meter station within the M17 monthly customer charge or pay this amount as an upfront CIAC payment, and that ENGLP elected to make a CIAC payment.
- b) Please confirm the Dornoch station will only provide service to ENGLP.
- c) Please confirm ENGLP included amounts relating to the customer station in its capital budget and revenue requirement calculations in its EB-2018-0264 Rate Application to the Board.
- d) Please confirm that the Rate T3 monthly customer charge includes recovery of the revenue requirement for rate base (net of any CIAC) and O&M costs associated with customer-specific stations.

Enbridge 3

Reference: ENGLP Evidence, page 26, lines 4-5

“...Enbridge is the only party able to provide the necessary daily balancing of ENGLP’s gas volumes...”

Question:

- a) How many market participants did ENGLP contact with an intent to procure balancing services?
- b) How many request-for-proposals (RFPs) did ENGLP issue to procure balancing services?
- c) Please provide all correspondence and/or RFPs that ENGLP has issued to other market participants.

Enbridge 4

Reference: ENGLP Evidence, page 21, lines 4-6

“...despite ENGLP asking for sufficient capacity to meet its Southern Bruce requirements as early as October 1, 2015.”

Question:

- a) Please indicate the date on which ENGLP provided Enbridge Gas executed copies of each of its M17 transportation contracts with Enbridge Gas. For clarity, please provide a date for each of the two M17 contracts executed.
- b) Please indicate the in-service dates and contract quantities listed in each of the above noted M17 transportation contracts.

Enbridge 5

Reference: ENGLP Evidence, page 36, line 12

“The initial M17 rate application included a load balancing agreement (LBA)...”

Question:

Please confirm that Enbridge Gas's modifications to the original M17 proposal came about as a result of ENGLP's dissatisfaction with the industry standard Load Balancing Agreement (LBA) and requirement for daily nominations.

Enbridge 6

Reference: ENGLP Evidence, page 39

Preamble: ENGLP states that it was "prepared to consider a 'modified' T3 service whereby the cost base storage embedded in the T3 service would be replaced with market-based storage costs."

ENGLP goes on to list the following key elements of such an arrangement:

- a) ENGLP would contract for a firm daily contract quantity whereby firm gas would be delivered to Enbridge at Dawn 365 days a year, effectively providing its own commodity requirements. This would be based on the projected annual load for the following year divided by 365,
- b) ENGLP agreed that its storage requirements under the modified T3 service would be market based,
- c) Enbridge in turn would provide daily load balancing as it does with the T3 service.

Enbridge Gas revised its M17 service in an effort to accommodate the requests outlined above. Enbridge Gas was and is of the view that Rate M17, combined with market-based storage and balancing services, provides the above noted elements requested by ENGLP.

Question:

- a) Please articulate the specific ways in which Enbridge Gas's M17 service, combined with market-based storage and balancing services, **succeeds** in meeting the requirements noted above by ENGLP.
- b) Please articulate the specific ways in which Enbridge Gas's M17 service, combined with market-based storage and balancing services, **fails to** meet the requirements noted above by ENGLP.

Enbridge 7

Reference: ENGLP Evidence, page 23

Question:

Please confirm that TC Energy holds capacity on Enbridge Gas's Albion pipeline (a.k.a. Segment A of the GTA Pipeline).

Enbridge 8

Reference: ENGLP Evidence, page 36, lines 12-17

Preamble: Enbridge Gas is of the view that the original M17 proposal and the inclusion of an industry standard LBA was more than adequate to alleviate ENGLP's concerns with regard to daily balancing.

Question:

Please complete the following table comparing the no fee daily variance threshold allowed for as part of the LBA proposal included in the original M17 proposal to EPCOR's load.

	No Fee LBA Tier 1 Upper Limit (GJ)	No Fee LBA Tier 1 Upper Limit (m ³) ¹	Year 10 Forecast Peak Daily Load (m ³ /d)	Balancing Limit as % of Year 10 Peak Daily Load
Daily	2,111	54,156		

¹ Conversion to m3 based on 38.98 GJ/10³m³ as per EB-2019-0273 Exhibit E, Tab 2, Schedule 1