

REF: Exhibit B, Tab 1, Schedule 2, pages 1-2

Preamble: EGI evidence states: “*Direct purchase customers in the Union South rate zone are obligated to deliver gas to Enbridge Gas at various receipt points upstream or on Enbridge Gas’s system, including the interconnect with TCPL at Parkway.*”

We would like to understand better the management and opportunities of the Delivery Obligation and Commitment Incentive.

- 1) Please provide a table showing all points of receipt of delivery of Direct Purchase on the Union South system. For each point of delivery, please provide:
 - a) Total firm daily receipts (TJ/day)
 - b) Total firm daily receipts that are obligated (TJ/day)
 - c) Unit rate of Commitment Incentive paid (\$/GJ)
- 2) Please confirm that firm daily obligated receipts at Kirkwall provide a system benefit to the Dawn-Parkway system similar to firm daily obligated receipts at Parkway.
 - a) Please confirm that firm obligated deliveries at Kirkwall provide a supply-side IRPA alternative.
 - b) Please provide the current ratio of flow capability created by receipts at Kirkwall versus receipts at Parkway.
 - c) Does EGI offer a Commitment Incentive at Kirkwall?
 - i) Has a Direct Purchase customer inquired about the possibility?
 - ii) Please provide EGI’s rationale as to why it would not provide a Commitment Incentive at Kirkwall to allow other DP customers to move their point of obligation back to Dawn and/or reduce PDO/PDCI costs.

REF: Exhibit B, Tab 1, Schedule 1, Section 3,
Exhibit D, Tab 2, Rate Order Working Papers Schedule 11 and
EB-2019-0194 Exhibit JT1.7

Preamble: We would like to understand better the evolution of the Dawn-Parkway system, the impact of PDO and capital builds and the resulting impact on rates.

3) Please update to current and provide the attachments provided in EB-2019-0194 Exhibit JT1.7

Preamble: EGI evidence states: *“In effect, Union South in-franchise customers receive a ‘distance credit’ as a result of the obligated deliveries at Parkway, which recognizes that design day demands supplied from Parkway are transported over a shorter distance than design day demands supplied from Dawn. Since Dawn-Parkway costs are allocated to Union South in-franchise rate classes on the basis of Dawn-Parkway design day demands, the primary beneficiary of the “distance credit” are Union South general service rate classes (Rate M1 and Rate M2).”*

We would like to understand better the application of the distance credit as applied to PDO.

- 4) Please describe specifically how the daily deliveries at Parkway are applied to in-franchise design day demands.
- a) Specifically, are the in-franchise design demands reduced proportionally along the Dawn-Parkway system or
 - b) Are the obligated Parkway deliveries netted against the most easterly in-franchise lateral demands or
 - c) Assumed to “move” from Parkway to the lateral(s) incurring fuel gas or
 - d) Describe specifically the approach used.

- 5) Please provide the resulting design day simulation results for this applications Dawn-Parkway system assuming that Parkway deliveries moved to Dawn as a result of the PDO settlement agreement:
- a) Were moved
 - b) Were not moved (i.e., before and after application of existing PDO to show effect)
- 6) For the purposes of Schedule 11 of the Working Papers, is the approach in IR #5 used to calculate the fuel impact?
- a) Please describe in full including how the EB-2011-0210 allocations are developed including simulation results and flows assumed in those simulations.
 - b) Using the description, please provide a verbal description along with numeric support that justifies an almost doubling of fuel gas allocated to Union South in-franchise versus an approximately 10% increase in total fuel gas shown on page 5 of Schedule 11.

REF: Exhibit B, Tab 1, Schedule 2 and

EB-2020-0091 FRPO_OEB_IRP_PRESENT_20210219 pages 11-17

Preamble: We would like to understand better the market-base alternatives considered and potential additional market-based alternatives.

- 7) The RFP produced in the Appendix specifies a Dawn receipt and Parkway delivery.
- a) Please confirm that a similar long-term exchange agreement that would use a Dawn receipt and Kirkwall delivery could provide additional flow capability to reduce PDO/PDCI costs similar to Dawn-Parkway.
 - b) Did EGI consider requesting proposal that could include Dawn receipt and Kirkwall delivery?
 - i) If not, why not?
 - ii) If so, why was that option not included in the RFP.

- 8) Did EGI consider contracting for long-term obligated deliveries to Parkway deliveries as a means of providing for required demands and reducing PDO/PDCI costs?
- a) If not, why not?
 - b) If so, why was that option not included in the RFP.
- 9) Did EGI consider contracting for long-term obligated deliveries to Kirkwall deliveries as a means of providing for required demands and reducing PDO/PDCI costs?
- a) If not, why not?
 - b) If so, why was that option not included in the RFP.
- 10) In EB-2020-0091, FRPO presented the opportunity to consider using Dawn LTFP deliveries committed by suppliers and facilitated by TCPL to Parkway as a means of using displacement to meet Dawn-Parkway demand.
- a) Has EGI consider the potential for employing displacement at Parkway in conjunction with TCPL as a means of meeting Dawn-Parkway demand?
 - i) If so, please provide all relevant communication with TCPL on the possibility including summaries of conversations.
 - ii) If not, why not? Please ensure the response includes any physical, commercial, or other reasons why this approach could not be used to satisfy a Dawn-Parkway demands even as a bridging solution to a longer term approach.
- 11) In November of 2020, EGI launched an Open Season to determine Dawn-Parkway demand starting as early as 2023. The deadline for response was January of 2021. Please provide:
- a) The demand bid for and the starting dates requested
 - b) The bids accepted
 - c) The impact on the forecasted Dawn-Parkway capability
 - d) The need for a Leave to Construct
 - e) The foreseen schedule for the application

REF: Exhibit D, Tab 1, Rate Order, Appendix B, Page 51

Preamble: We would like to understand better the utilization of Segment A from Parkway to Albion and its impact on rates.

12) Please confirm that TCPL pays for 1200 TJ/day demand capacity under Rate 332.

a) If not confirmed, how much is allocated and paid for by TCPL.

13) What is the current design day demand of EGI's GTA system that is served by Segment A for the winter of 2021/22?

a) Has EGI explored or implemented any initiatives to mitigate the cost of the remaining capacity?

i) If so, please describe the initiatives and the expected impact on rates 2022.

ii) What was the impact of these initiatives in 2020 and how were the revenues allocated?