INTRODUCTION

The current proceeding is the second stakeholder consultation and the third update to the original 5 year Gas Supply plan initiated in 2019. The Board's original report provided its expectations for the Framework for Gas Supply review. *The Framework sets out the OEB's approach for the assessment of the cost consequences of rate-regulated natural gas distributors' (distributors) gas supply plans. The Framework will ensure that there is transparency, accountability and measurability regarding the distributors' gas supply plans to assure they deliver value to consumers.*[1]

Since the original application, the Federation of Rental-housing Providers of Ontario (FRPO) has expressed concern over the lack of information provided about the costs of the Gas Supply plan, the cost comparison of alternatives, and ultimately, the impacts on customer's bills.[2] Our struggle has been navigating the process of moving from the distributor's plans to forecast costs to actual costs borne by customers as well as understanding where these costs are tested. Our concern remains.

This year, we hope to describe better our concerns by providing our perspective on a specific incremental contract acquisition in the update, specifically Vector pipeline, to demonstrate our concerns. We believe this approach will provide additional insight for the Board and stakeholders and result in improved decision-making and transparency of the utility in their planning, implementation, and reporting. Ultimately, we are seeking improved outcomes for ratepayers.

In that regard, we are asking for the Board's consideration to opine on the wisdom of the actions of Enbridge Gas Inc. (EGI) in extending and increasing its contracted capacity on the Vector pipeline. After a thorough review of this aspect of the gas supply plan, we

[1] EB-2019-0127 Report of the Ontario Energy Board: Framework for the Assessment of Distributor Gas Supply Plans
[2] EB-2019-0137 FRPO_Comments_20191021 and FRPO_COMMENTS_20200118 and EB-2021-0004 FRPO_Comments_EGI_20210511

are concerned that the decisions related to Vector capacity do not reflect the best interests of ratepayers. We trust the following submissions will assist the Board in its consideration of these matters inside the Framework established.

EGI EXTENDED COMMITMENT TO THE VECTOR PROVIDES UNCLEAR VALUE

In Section 7 of its Update,[3] EGI provides its Supply Option Analysis section. This section outlines the approach that EGI takes in considering the different paths from which the company can choose to supply the needs in specific geographic areas of its franchise.

The identified needs are separated between design day demands and average day requirements.[4] Those needs are different and the tools that EGI has at its disposal to supply these needs are different even within a geographic location. The evidence provided by the company includes a description of the different paths and a qualitative assessment of the options available that could meet the specific need. The only time that a quantitative analysis is provided is when specific contracts are renewed or added. In those cases, Transport Contracting Analysis[5] is provided.

Since the outset of the first 5 Year Gas Supply plan[6] including this year's,[7] at the outset of the Stakeholder conference, we have asked about quantitative analysis and when the decisions of the utility would be tested for impact on the customer. We are still searching for a definitive answer.

Specific to this update, in relation to the Vector issue, EGI provided a section called Portfolio and Transportation contracting changes in its presentation.[8] Our areas of

[3] EGI_2022 Annual Update Gas Supply Plan_20220301_eSigned, Section 7
[4] In our first submission under the Framework, FRPO_Comments 20191021, pg. 1-2, we strived to distinguish the respective needs to try to bring context to our comments.
[5] Incremental Transportation Contracting Analysis as outlined in the EB-2005-0520 Settlement Agreement
[6] EB-2019-0137 Transcript_Consultation_Volume 1_20140923, pg. 23, lines 18-28
[7] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 1, pg. 21, line 8 to pg. 23, line 23
[8] EGI_StakeholderConference_Compendium_20220503_eSigned, slides 38-46

concern revolve around the renewal and addition of Vector capacity between Chicago and Dawn.

Vector Pipeline Function Has Evolved

When Vector Pipeline was built around the year 2000, its primary purpose was to move gas from the Chicago area through Michigan to Dawn. The pipeline was a joint venture between Enbridge Inc. and DTE of Michigan and contributed to moving Western Canadian gas from the newly built Alliance and Northern Border pipelines to markets in Michigan and Ontario.

However, with emergence of shale gas from Appalachia, many North American pipelines became bi-directional,[9] and Vector was no exception. New pipelines also sprung up to move gas out of the Appalachia regions, like Rover and Nexus. Both pipelines were designed to move gas from Ohio through to Michigan and, ultimately, into the Vector pipeline (see attached Vector pipeline schematic in Attachment 1). The addition of the supply feeds into Vector created opportunities for the movement of gas in either direction: Chicago or Dawn. This two way option allows marketers to flow their gas in either direction to capture the greatest benefit (arbitrage). As a result, prices available in Chicago and Dawn markets will move on their own based on the markets' view of supply and demand for a given time or period. However, the option to flow large quantities of Appalachian gas west to Chicago or east to Dawn tends to balance the price between the two locations resulting in limited difference in value over time.

EGI Legacy Utilities Contracting

During that time, EGI's legacy utilities Enbridge Gas Distribution and Union Gas both sought gas from new, more geographically proximal sources. As a result, they individually entered into precedent agreements with Nexus pipeline. During the proceeding wherein the utilities sought pre-approval of the cost consequences of their

[9] FRPO_Presentation_OEB_GAS SUPPLY CONSULT_20151125. At the outset of the Distributor Gas Supply Planning Consultation, FRPO presented the expected change in pipeline flows in the North American Gas Market to advise the Board of the evolution that was coming

respective Nexus contracts,[10] FRPO was challenging the need for the Ontario utilities to underpin the construction of the pipeline with gas already expected to arrive at Dawn with the building of the Rover pipeline. In pursuing this concern, FRPO questioned Enbridge Gas' expert witness, Mr. Stephens, who confirmed our belief that with the interconnection of pipelines flowing gas from Appalachia to the Vector pipeline, Chicago and Dawn would be linked and differences would be arbitraged out of the market over time.[11]

As a result, it came as a surprise to us that EGI would be increasing its contracted capacity on Vector by paying a firm toll to move gas from the Chicago hub to the Dawn hub over a five-year contract. In our view, to the extent that EGI believed the best place to source additional gas was Chicago, they could have entered into market-based exchanges that would be priced closer to the limited differential in price between the two hubs.[12]

When we asked about the reasoning, we were told that the company opted for pipeline contracting because of renewal rights and their control of the delivery.[13] Their evidence also indicated that their decision was supported by the Transportation Contract Analysis.[14] EGI emphasized that part of their rationale in bidding into the Vector open season was that it was the "first time that Vector's capacity has been made available in a number of years."[15] In its Open Season document, Vector communicated that it initiated some enhancements to maximize its capabilities in either direction and had existing capacity coming available Nov. 1/21.[16]

[10] EB-2015-0166/0175
[11] EB-2015-0166-0175 Union-Enbridge-NEXUS Volume 3 Tuesday November 17 2015, pg. 68-70
[12] FRPO_QUEST_EGI_GS UPDATE_20220414, pg. 2, Question 17
[13] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 2, pg. 27, lines 24 to 25
[14] EGI_2022 Annual Update Gas Supply Plan_20220301_eSigned, page 39
[15] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 2, pg. 10, lines 26-27
[16] http://www.gasnom.com/ip/vector/fileviewer.cfm?FromLoc=notices&file=Vector%20Non%20Binding%20Open%20Season%20Package%2Epdf

Our view is that the complete path from Chicago to Dawn is not valued as it was in its initial operation by parties in the market that understand the economics. Our expectation that Chicago and Dawn would be priced comparably over time was borne out by market data. That view is supported by the fact that Vector was going out for a non-binding open season and contracting at discounts on their firm toll/recourse rate.[17]

EGI Contracts for More Vector Capacity for both Legacy Utility Rate Zones

EGI bid for additional capacity in the Vector Pipeline Non-Binding Open Season held from January 14th to February 5, 2021.[18] The timing was interesting in that during the middle of February of 2021, Storm Uri brought bitter cold to central US, including south central US, resulting in prices in Chicago hitting over $100/Dth. The realization of the potential for price spikes in Chicago may have driven away some bidders who recognized the Open Season was non-binding and they may have had options. Nonetheless, EGI entered into firm contracting for an additional 40,000 Dth/day from Chicago to Dawn at the end of March in conjunction with extending its existing contracts from Chicago to Dawn of 80,000 Dth/day.[19] The combination of the new capacity, the renewed capacity along with existing contracting has increased the amount of capacity to 185,000 Dth/day or almost 200,000 GJ/day that EGI has contracted from Chicago to Dawn with Vector whose majority owner is still Enbridge Inc.

Transport Contract Analysis Does Not Align with Market Data

EGI provided Transport Contract Analysis in support of its new contract[20] and its extension.[21] The data in these analyses are provided by ICF. Given our knowledge of the market combined with the confirming thoughts of Mr. Stephens mentioned above, we were concerned that the company did not undertake any test for reasonableness in continuing and expanding its pipeline position from Chicago to Dawn on its parent's Vector Pipeline. We asked a number of questions in advance of the Stakeholder

[17] EGI_2022 Annual Update Gas Supply Plan_20220301_eSigned, pg. 39
[18] Ibid.
[19] EGI_2022 Annual Update Gas Supply Plan_20220301_eSigned, pg. 62, Table 30
[20] EGI_2022 Annual Update Gas Supply Plan_20220301_eSigned, Appendix D
[21] EGI_2022 Annual Update Gas Supply Plan_20220301_eSigned, Appendix G

conference to try to establish an understanding of the data relied upon in the decision-making process.[22]

In the stakeholder session, we clarified that we were seeking data published in the market based upon actual transactions and requested/pleaded that EGI provide that information.[23] After the extensive dialogue, in returning from the break, EGI provided the numeric averages in daily differential between Chicago and Dawn from Platts Gas Daily.[24] For better clarity, we provide the summary of price at Chicago minus the price at Dawn over the four quarters of 2021.

2021 Quarter	1st *	2nd	3rd	4th
Diff Chicago minus Dawn ($/US MMBtu)	0.02	0.01	0.03	(o.07)

* The 0.02 does not include data from price spikes caused by Storm Uri otherwise the effective differential would be $5.86[25]

We would ask that EGI confirm, in its comments, the accuracy of the table or provide corrections accordingly.

As one would observe from the table, the average price difference between Chicago and Dawn stays relatively flat (close to zero) when viewed over a longer period like a calendar quarter or year. Yet, if that is compared to the ICF forecasts used in the contracting decision-making[26] (also shown in the graph in slide presentation),[27] the Chicago minus Dawn is forecasted to be approximately minus $0.10 over the three to five years considering for the contracting terms. **Even if one did not struggle with the discrepancy between market data and ICF's forecast, one would question why a company would commit itself to 3 to 5 year contracts costing $0.16-$0.20 when fuel is included to save a forecasted $0.10**.

[22] FRPO_QUEST_EGI_GS UPDATE_20220414, pg. 2
[23] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 2, pg. 20, line 3 to pg. 27, line 11
[24] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 2, pg. 49, line 7 to pg. 50, line 1
[25] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 2, pg. 49 lines 12-20
[26] EGI_2022 Annual Update Gas Supply Plan_20220301_eSigned, Appendix D & G
[27] EGI_StakeholderConference_Compendium_20220503_eSigned, slide 27 of the presentation

To try to demonstrate that the 2021 quarterly differences are not aberrations or anomalies, we asked EGI to provide the same quarterly numbers for 2020 but they declined.[28] **We submit to the Board that we have analyzed the quarterly differences of 2020 and they are very similar to the 2021 quarterly values provided by EGI. We welcome the company to put the 2020 numbers on the record if they don't agree with our analysis.**

Given our concern about the discrepancy between market data and the Transport Contract Analysis, we had urged EGI to provide published market data for the forecast period as captured above. EGI declined to provide the information[29] even after we attempted to help them understand that we were seeking a test for reasonableness and that this data that should be available to the company and their resources with appropriate permissions as necessary.[30]

Test for Reasonableness Data is On the Public Record at the Board

Given our extensive pursuit of the company to try to assist the Board with market data that the company has, we sought that data elsewhere in a way that could be published appropriately. After some effort, we were able to find a strong example of the requested data in evidence already filed by EGI in late 2021 in the DSM proceeding.[31] We are attaching to these submissions (see Attachment 2), the question and two pages of a long interrogatory response provided to Environmental Defence in their request for price forecasts from EGI's Gas Supply department and other third-party forecasts.[32]

As opposed to expressing our concern and disappointment as to why our inquiry was not met with similar responsiveness, we want to clarify the point that we thought market data would and does show. Environmental Defence's request specified their preference for pricing in C$/m3. Since EGI provided those units and we have used $US/MMbtu

[28] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 2, pg.50, line 11-27
[29] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 2, pg.51, line 1 to pg. 52, line 5
[30] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 2, pg.82, line 20 to pg. 88, line 11
[31] EB-2021-0002
[32] EB-2021-0002 Exhibit I.5.EGI.ED.12

(or sometimes called Dth) in the above submissions, we have taken the liberty to convert the values in the interrogatory response into comparable $US/MMBtu. The following table is refined to show how the market strips value price of gas at Chicago and Dawn for the next five years as compared to EGI's data prepared in a proprietary way by ICF.

October Natural Gas Forward Strip
(US$/MMBtu)

	2022F	2023F	2024F	2025F	2026F
Dawn	$3.4173	$2.9423	$2.7682	$2.7854	$2.8005
Chicago	$3.5763	$3.0541	$2.8821	$2.8886	$2.9101
Chicago minus Dawn	$0.1590	$0.1118	$0.1139	$0.1032	$0.1096

(converted using *conversion factors in ED.12)

ICF International 2021 Q3 - Natural Gas Supply Price Forecast
(US$/MMBtu)

	2022F	2023F	2024F	2025F	2026F
Dawn	$3.4431	$3.0928	$2.9875	$3.4130	$3.2325
Chicago	$3.3270	$2.9832	$2.8972	$3.3421	$3.1486
Chicago minus Dawn	-$0.1161	-$0.1096	-$0.0903	-$0.0709	-$0.0838

(converted using *conversion factors in ED.12)

As can be seen in the top table above, the forward strips provided show how the market values the forward price of gas at the respective locations. This view is in stark contrast the forecast provided by ICF in the table below Still as noted above, even if Chicago prices were 10 cents below Dawn, would it be prudent to buy fixed transport costs and expected fuel for 18 to 20 cents to deliver to Dawn? More dramatically, how would it be prudent to pay those transportation and fuel costs if the Chicago price is at least 10 cents above Dawn? If the market values displayed above were input into the Transportation Contract Analysis in Appendices D and G, different approaches would emerge as the best value for ratepayers.

We understand the gas supply principles and that the utility can value other aspects of their supply plan over price. However, in our view, this situation warrants explanation. **We respectfully request that EGI provide its responses in its submissions.**

Actual Transportation Costs are Difficult to Discern in QRAM

In striving to understand this issue, FRPO reviewed the QRAM filing for April 1st.[33] We struggled to understand how to reconcile actual transportation costs incurred from the schedules.[34] At the Stakeholder conference, we asked for additional clarification to understand the reconciliation between forecast and actual costs.[35] To assist the dialogue, FRPO emailed the subject QRAM schedule (Exhibit C, Tab 1, Schedule 1) edited by us to show the lines and math we were trying to reconcile.[36] After the break, even with the company and FRPO looking at the same document, it was difficult to reconcile the math in part because "finance" provides the quantity of Chicago purchases not gas supply.[37]

Through EGI's agreement, we received an undertaking that provides the multiple sources of gas that feeds Vector transport (Chicago and Dominion) for the Enbridge rate zone.[38] We more clearly understand that we will need to take a further step in tracking the actual costs through the PGVA. At the same time, we recognize that we may not have all of the costs (and potential revenues) in evidence as we do not know the UDC and/or reductions in gas cost associated with release/assignment of transport.

Requested Transportation Assignments Not Provided by EGI

Given FRPO''s past experience, we tried to understand why this contracting would make sense. In our pre-conference questions, we requested EGI complete a table that would detail their assignments of transportation capacity, quantify the proceeds and provide

[33] EB-2022-0089 – Enbridge Gas Inc. – April 1, 2022 Quarterly Rate Adjustment Mechanism (QRAM) Application
[34] FRPO_QUEST_EGI_GS UPDATE_20220414, pg. 2, Question 18
[35] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 2, pg.31, line 1 to pg. 34, line 9
[36] Exhibit K2.1 submitted under FRPO_SUB__EXHIBIT_20220510
[37] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 2, pg.52, line 11 to pg. 55, line 26
[38] EGI_J2.1_Undertaking_Responses_20220510_eSigned

their accounting of the benefits. In spite of their slide called Operationalizing the Gas Supply Plan: Chicago, EGI witnesses deferred answering the posed questions to the Deferral Account proceeding.[39] We requested that they provide feedback on their ability to answer those questions in the upcoming Deferral Account proceeding and we were assured that they could.[40]

As we did not receive an explanation as to how the transport is being utilized from the company, FRPO turned to public information on the Vector website.[41] From data downloaded from this website, it appears that Enbridge has been assigning the capacity, including in the winter months, to third party marketers. While we understand that the markets can still move EGI purchased Chicago supplies to Dawn through exchanges and other mechanisms, the question is why EGI would not do that themselves saving customers the higher cost of the tolls.

We highlight the above discovery requested for the Board's understanding as we will be asking the same or similar questions about assignments in the upcoming Deferral Account disposition proceeding. Moreover, as we tried to outline in the section on QRAM reconciliation, we wanted to convey in what way the current structure of how gas supply is contracted, implemented and reported is problematic; the current structure makes it difficult for ratepayers to assist the Board in understanding how the utility is using the ratepayers' proxy to make these decisions in the ratepayers' interest.

[39] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 2, pg 28, line 23 to pg.30, line 25
[40] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 2, pg. 68, lines 1 to 18
[41] http://www.vector-pipeline.com/Informational-Postings/Downloads/Transcational-Reporting-Capacity-Release.aspx

HARMONIZATION SHOULD RESPECT GEOGRAPHICAL ACCESS TO RESOURCES

One additional important point that FRPO would like to submit for EGI's, and the Board's consideration is the importance of recognizing geography as it pertains to the selection of alternatives. EGI witnesses emphasized the importance of a level playing field that harmonization would bring.[42] Initially, we were concerned as, on behalf of ratepayers, some geographical areas have superior access to resources that provide choice. This choice should be exercised by the utility in the most effective manner on behalf of customers.[43] Read in context of the rest of the page of transcript, it appears that the company is saying all customers should have the same risk management principles applied to their supply and we support that.

CONCLUSION

FRPO has attempted to provide the Board with its concerns about the disjointed nature of the process from gas supply plan to customer bill impact. In pursuing this understanding to assist the Board, we focused on EGI's contracting with Vector Pipeline. From the questions asked and additional research done, FRPO has concerns that decisions to extend and increase contracting between Chicago and Dawn does not provide ratepayers value in that:

1) The gas supply acquisition is not cost effective versus other alternatives
2) The contracting of firm deliveries through pipeline contracting is not provided if the contract is assigned to a marketer that delivers the gas through market-based mechanisms.

Further, we are concerned with why this acquisition is occurring and what parties benefit from the subsequent assignment of the acquired pipeline rights.

As a result, we would ask that Board staff, subject to comments of EGI, provide its understanding of our concerns to the Board for consideration. This consideration could include additional procedural steps required to assure that the Gas Supply plan is operating in a way that aligns with the Framework principles of transparency,

[42] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 1, pg. 37, lines 6 to 8
[43] Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 1, pg. 53, line 17 to pg. 54, line 12

accountability and measurability. In the alternative, staff could reserve its submissions and the Board its consideration of additional procedural steps until the discovery and examination of the cost consequences of these areas of the Gas Supply plan through the upcoming Deferral Account proceeding. Ultimately, these considerations will advance ratepayers' interests in ensuring the Gas Supply plan delivers value to customers.

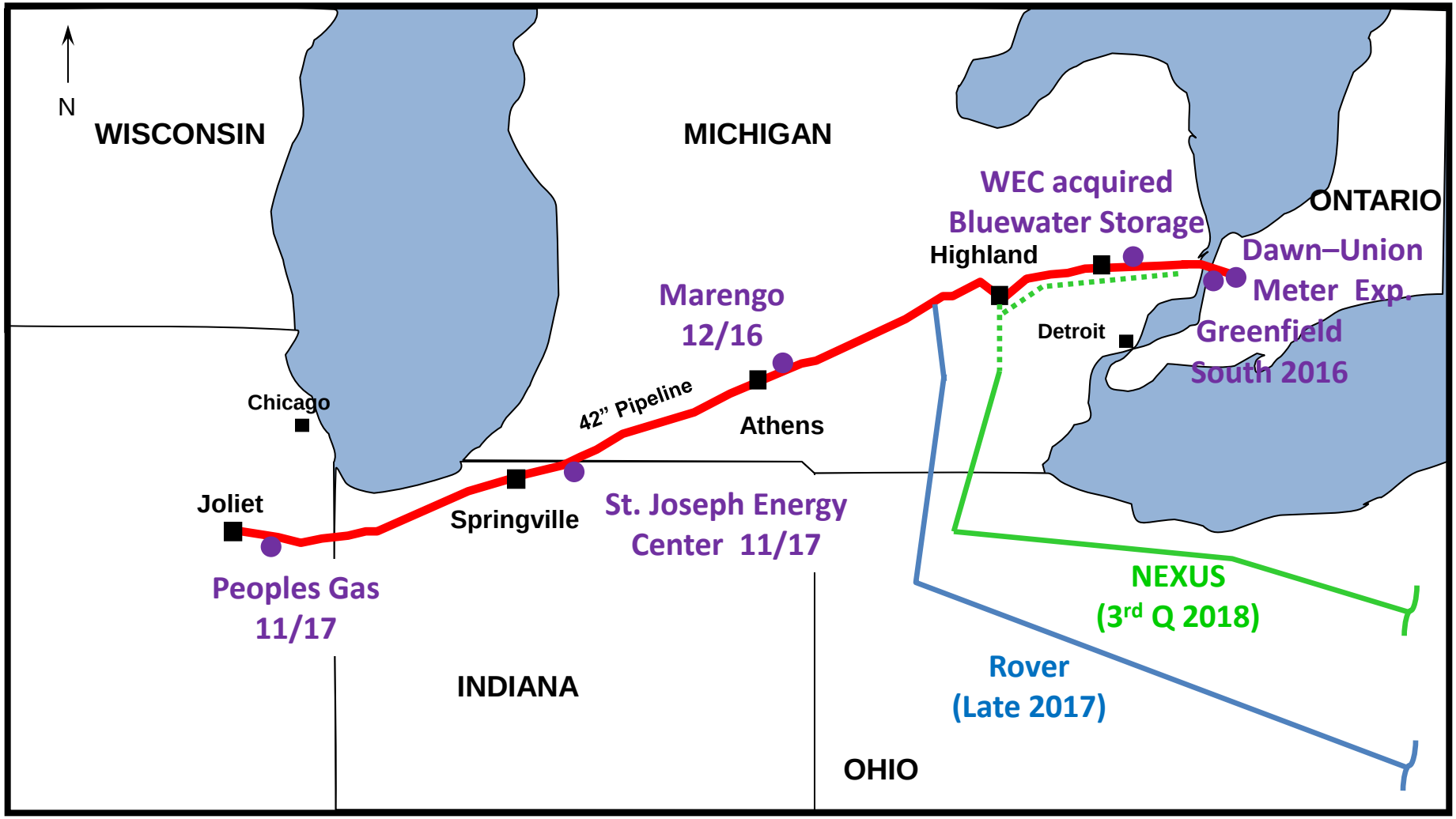
ALL OF WHICH IS RESPECTFULLY SUBMITTED ON BEHALF OF FRPO,

Digitally signed by R. Dwayne Quinn
DN: cn=R. Dwayne Quinn, o=DR QUINN & ASSOCIATES LTD., ou=PRINCIPAL, email=drquinn@rogers.com, c=CA
Date: 2022.05.27 16:28:18 -04'00'

Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

Vector Pipeline™

New Interconnections



Annual carbon costs[5]			
Annual gas related costs - other[6]			
Annual gas costs - total			

(h) Please complete above table for 2023-2027 as best as possible.

(i) Please complete the following table based on the most current information available. Please state the source of figures. You may wish to focus on prices for gas procured by Enbridge for its customers.

Gas Prices (Commodity and Carbon) – Historic and Future			
	2015 (historic)	…	20nn (forecast future year as far as the current forecast goes)
Average annual gas commodity price ($/m3), excl. carbon			
Annual carbon price $/m3			

(j) Please ask Enbridge's gas supply planning group to provide their latest gas price forecasts. Please also ask that group to provide a copy of the most current third party gas price forecasts in their possession. Please file all of those. If any of those forecasts are in units other than $/m3, please also provide a table converting them to $/m3.

(k) Does Enbridge have any reason to expect that average annual gas commodity price paid by distribution customers who purchase from entities other the Enbridge would be higher or lower than the average annual gas commodity price for gas procured by Enbridge for its customers? Would the price paid by direct purchase customers potentially be higher because their do not have the same degree of buying power as Enbridge?

[5] Please exclude carbon costs from the commodity prices above to avoid double counting. For customers responsible for their own carbon costs, please either estimate their cost or exclude them from this row and indicate so in the response.

[6] If the above items are missing anything, please include them here.

e) Please see response to Exhibit I.5.EGI.EP.1a.

f) Please see Attachment 1. Please note, Attachment 1 was completed based on the rates approved with the January QRAM for the years 2015 to 2021, and the 2022 Rate Application for 2022.[9] Enbridge Gas does not forecast typical customer bill amounts for future years.

g) Please see Attachment 2.

h) Please see Attachment 3.

i) Please see response to part g above.

j) Enbridge Gas's gas supply planning group does not develop its own gas price forecast. For rate setting purposes, Enbridge Gas uses natural gas forward strip prices. The table below provides the October natural gas forward strip prices for various trading points, converted to C$/m^3.

October Natural Gas Forward Strip (C$/m3)*						
	2022F	2023F	2024F	2025F	2026F	2027F
AECO	0.1287	0.1082	0.1020	0.1041	0.1063	n/a
Empress	0.1355	0.1134	0.1089	0.1090	0.1113	n/a
Henry Hub	0.1743	0.1498	0.1401	0.1385	0.1386	n/a
Dawn	0.1590	0.1369	0.1288	0.1296	0.1303	n/a
Niagara	0.1446	0.1226	0.1153	0.1159	0.1162	n/a
Chicago	0.1664	0.1421	0.1341	0.1344	0.1354	n/a
MichCon	0.1570	0.1334	0.1253	0.1271	0.1292	n/a
Dominion South	0.1294	0.1087	0.0985	0.0963	0.0964	n/a
PEPL	0.1549	0.1264	0.1168	0.1164	0.1167	n/a
Iroquois	0.2742	0.2351	0.2240	0.2223	0.2224	n/a
**Conversion factors: GJ/MMBtu = 1.055056; C$/US$ = 1.26; MJ/m3 = 38.96*						

ICF International is Enbridge Gas's primary third-party that provides natural gas price forecasts. The table below shows ICF International's 2021 Q3 Natural Gas Supply Price Forecast, converted to C$/m^3.

[9] EB-2021-0147, EGI 2022 Rates Phase 1 Application (June 30, 2021).

ICF International 2021 Q3 - Natural Gas Supply Price Forecast						
	C$/m3*					
	2022F	2023F	2024F	2025F	2026F	2027F
AECO	0.1302	0.1160	0.1134	0.1397	0.1292	0.1182
Empress	0.1367	0.1225	0.1194	0.1456	0.1352	0.1242
Henry Hub	0.1584	0.1387	0.1340	0.1512	0.1404	0.1311
Dawn	0.1602	0.1439	0.1390	0.1588	0.1504	0.1399
Niagara	0.1505	0.1344	0.1293	0.1466	0.1368	0.1265
Chicago	0.1548	0.1388	0.1348	0.1555	0.1465	0.1358
MichCon	0.1551	0.1389	0.1348	0.1547	0.1454	0.1353
Dominion South	0.1263	0.1096	0.1048	0.1163	0.1019	0.0924
PEPL	0.1478	0.1308	0.1267	0.1447	0.1357	0.1253
Iroquois	0.1856	0.1669	0.1602	0.1814	0.1742	0.1627
**Conversion factors: GJ/MMBtu = 1.055056; C$/US$ = 1.26; MJ/m3 = 38.96*						

k) Enbridge Gas is a price taker and procures gas supply through competitive bidding processes with creditworthy suppliers at natural gas supply hubs in Canada and the United States. The price paid by any market participant for gas supply will reflect each market participant's procurement process and the market environment at the time the supply arrangements are set. As a result, Enbridge Gas is not privy to natural gas prices paid by other market participants, including direct purchase customers of Enbridge Gas.