ISSUE 1: NEED

REF: Exhibit B, Tab 1, Schedule 1, p. 2-3, 7, 11, 13 including Table 1 & Attachments 1 & 2

Preamble: EGI evidence states: *Enbridge Gas's current Design Day demand forecast, discussed in detail below, indicates that the Panhandle System demand will increase by 22 TJ/d to 694 TJ/d by Winter 2022/2023, and by an additional 50 TJ/d to 744 TJ/d in Winter 2023/2024.*

....

Contract rate customer demand makes up approximately 98% of the capacity of the proposed Project. At the time of filing, approximately 80% of the contract rate customer demand is subject to a customer commitment. Enbridge Gas has secured approximately 159 TJ/d of binding commitments with customers, including approximately 62 TJ/d of executed firm distribution contracts. Moreover, 100% of the 2023/2024 forecasted incremental demand on Panhandle System is currently secured with binding customer commitments.

We would like to understand better the forecasted growth and the amount of growth for which EGI has a binding commitment.

1) Please expand Table 1 with the amount of demand for which EGI has received a binding commitment and the amount that is requesting a move from interruptible to firm demand.
   a) Further please describe any monetary contractual commitments associated with these commitments such as aid-to-construct, minimum annual volume, term, consequences associated with not ultimately contracting for the future demand, etc.

2) Did EGI explore and discuss with customers what level of rate reduction that firm customers would need to move to interruptible?
   a) If not, why not?

Preamble: EGI evidence states: *Natural gas is uniquely suited to the greenhouse sector. It is used to heat greenhouses and to supply the carbon dioxide requirements ("CO2") of the growing plants. A common practice within the greenhouse sector is to capture the CO2 that would normally be emitted into the atmosphere upon combustion of natural gas and use it within the greenhouse where it is consumed by the growing plants, resulting in faster growth and increased production.*

3) Has EGI considered a different rate for greenhouses that reflects the benefits to greenhouse owners as higher than customers who simply use natural gas for energy?
   a) If not, why not?

4) For the schematic structure provided in Attachment 1, in tabular format, please provide the throughput and direction through:
   a) Dover Transmission to the NPS 16 & separately to the NPS 20
   b) Leamington North Gate (please add pressure also)
   c) Grand Marais Station
   d) Sandwich Station
   e) Ojibway Measurement (table shows demand of 30TJ – seeking clarification)
   f) Detroit River Crossing

5) Please provide the information in Attachment 1, including the flows requested in IR#4 above, with the addition of:
   a) The proposed 19 km of NPS 36 with demands for:
      i) Winter 2023/24
      ii) Winter 2030/31 (using Table 1 demands)
   b) The proposed 12 km of NPS 16 with demands for:
      i) Winter 2023/24
      ii) Winter 2030/31 (using Table 1 demands)
   c) Both the proposed 19 km of NPS 36 and the 12km of NPS 16 with demands for:
      i) Winter 2023/24
      ii) Winter 2030/31 (using Table 1 demands)

ISSUE 2: ALTERNATIVES

REF: Exhibit B, Tab 2, Schedule 1, p. 3, 5, 6, 7 and
EB-2016-0186 including Exhibit K2.1 Union_Further Correspondence_20161122

Preamble: EGI evidence states: *Two NPS 12 pipelines ("Detroit River Crossing" or "the crossings") connect the NPS 16 Panhandle Line at Ojibway to the Panhandle Eastern Pipeline System ("Panhandle Eastern")[2] at the International Border. This interconnection was established in 1947 and is commercially known as Ojibway. The Detroit River Crossing MOP is 2930 kPag.*

[2] *Panhandle Eastern Pipe Line Company, LP is owned by Energy Transfer Equity L.P.*

We would like to understand more about EGI's review of the potential for increasing supply at Ojibway. During the last major Panhandle Reinforcement proceeding, EB-2016-0186, there was significant evidence regarding Energy Transfer's desire to increase deliveries to Dawn including the potential to obligate at Ojibway. We understand that EGI held discussions with Rover, of which Energy Transfer holds an ownership position, but we are interested in discussions with Energy Transfer who owns the Panhandle Eastern Pipeline.

6) Please summarize the contractual agreements that Union Gas/Enbridge Gas Inc. had/have with Energy Transfer as it relates to Panhandle Eastern deliveries to and through Ojibway to the EGI's Panhandle system:
   a) Prior to November 1, 2016
   b) After November 1, 2016, as the agreements relate to negotiations occurring during the proceeding.
   c) Currently

7) Please file EB-2016-0186 Exhibit K2.1
   a) Please file all correspondence (letters, emails, other electronic communication, etc.) between Energy Transfer and Union Gas/Enbridge Gas Inc. since Dec. 1, 2016, that relates to capacity on Panhandle Eastern to and potentially through Ojibway to EGI's Panhandle system.
   b) Did EGI approach Energy Transfer regarding:
      i) Obligating deliveries as contemplated in Exhibit K2.1?
         (1) If not, why not?
      ii) Increasing capacity across the Detroit River?
         (1) If not, why not?

8) Please provide the most recent determination of cost estimate for increasing capacity across the Detroit River.

Preamble: EGI evidence states: *The Panhandle System's ability to accept supply at Ojibway is limited to 115 TJ/d in the summer and 140 TJ/d in the winter.*

9) Please confirm that these values are exactly the same as those provided in the Panhandle Reinforcement Project.
   a) In an Excel spreadsheet, please provide the data from which the summer and winter values in this proceeding were derived (ideally with working formulae showing the resulting values).

Preamble: EGI evidence states: *The minimum firm Panhandle Market is limited by the base load summer Windsor market demands and the capacity of Sandwich Compressor to compress gas from Windsor towards Dawn. The capacity of the Sandwich Compressor is 80 TJ/d and limited by the fixed amount of horsepower available.*

10) Please provide the current function and operating range of the current Sandwich Compressor.

i) Please describe the limitations of the compressor and what could be done to increase the amount of Windsor market available in the summer.
   (1) How much could the market be increased and what is the cost estimate of improvements.

ii) Please describe the limitations of the compressor and what could be done to increase the amount of gas that could be accepted at Ojibway in the winter including additional compression to push gas into the Leamington market.
   (1) How much could the amount that could be accepted at Ojibway in the winter be increased and what is the cost estimate of improvements.

Preamble: EGI evidence states: *The Panhandle System currently has two minimum pressure constraints which must be maintained:*

- *The BBGS is located at the extreme western end of the Panhandle System just east of Ojibway. The pressure constraint for the entire Panhandle System is located at the outlet of the BBGS customer station, where the contracted minimum delivery pressure must be maintained at or above 1,724 kPag; and*
- *The Leamington North Gate Station is the endpoint of the Leamington North Line which is a lateral connected to the NPS 20 Panhandle Line. The system pressure at the Leamington North Gate Station must be maintained at or above of 2,275 kPag.*

We would like to understand better the identified constraints and what may be done to overcome them.

11) Did EGI contact BBGS to determine if the customer would be willing to accept any form of interruptible contract, demand response reduction or payment to lower inlet pressure requirements (possibly to 1200 kPa or lower) to assist with reducing this constraint?
   a) If not, why not?
   b) If so, please describe all efforts and reasons why this approach would not assist in reducing the constraint.

12) Please describe and provide a cost estimate for station enhancements (e.g., control valves, etc.) that could replace current regulating equipment at Leamington North Gate to maximize the throughput while minimizing the station pressure differential to reduce the pressure constraint significantly (1725kPa or lower) while allowing forecasted 2023/24 flows (or higher).

13) If the pressure constraint at BBGS were reduced to 1200 kPa or lower and the inlet to Leamington North Gate were reduced to 1725 kPa or lower, please identify what year further reinforcement would be required to accommodate forecasted need provided in Attachment 1.

a) Please provide the results of the Winter 23/24 simulations with all pressures and the flows and pressures requested in IR#4.