

**REF: Exhibit A, Tab 3, Schedule 1, page 16, para. 44**

Preamble: We would like to understand better, the evolution of the Precedent Agreements outlined in this paragraph.

- 1) Please provide a copy of the original PA signed June 5, 2014.
- 2) How much capacity was committed to in the original PA?
- 3) Please provide the analysis that supported the original acquisition of capacity and the intent to contract for 150,000 Dth/day.
- 4) Please provide the analysis that was done to support a reduction to 110,000 Dth/day.
- 5) Please provide any additional criteria that contributed to the decision to reduce the contract.
- 6) What changed from Enbridge's perspective that drove the desire to decrease the commitment?
- 7) Please provide all internal correspondence, presentations and materials that were used in obtaining approval of this reduced level of commitment.

EB-2015-0175/0175

OEB BOARD SECRETARY	
No:	Sub File: 10
Panel:	CS, CL, MM, K
Licenses:	Colin
Other:	
DD/DA:	NS

**REF: Exhibit A, Tab 3, Schedule 1, page 18, para. 48**

- 8) In subsection a), please define the review of regional supply
  - a) What options flow from that review?
- 9) In subsection b), what happens to the Agreement if no approval has been granted after 90 days post October 1<sup>st</sup>?
  - a) What are the commercial consequences?
  - b) Who bears the risk?

**REF: Exhibit A, Tab 3, Schedule 1, page 21, para. 57**

- 10) Did Enbridge have exploratory discussions with Rover prior to the announcement in June 2014?
  - a) When did those discussions start and cease?

- b) What prompted Enbridge to end the discussions?

**REF: Exhibit A, Tab 3, Schedule 1, page 23, Table 1, Appendices B and C and  
EB-2015-0166 Schedule 4**

- 11) What is the delivery of the landed costs in Table 1?
- 12) Please provide all of the assumptions that support escalation of gas cost at Niagara between 2020 and 2021.
- Please provide any supporting documentation or calculation to arrive at this forecast.
  - The forecasted gas cost of Niagara is greater than Dawn for the remaining period of evaluation. However, in the Union Contracting analysis, Niagara prices are a relatively constant discount to Dawn for the entire period. Can Sussex reconcile these two views?
  - Please provide the contributing factors that led to the reversal of the basis differential between Dawn and Niagara between the analysis in Appendix B and Appendix C.
- 13) Using the format in Appendix C for May 2015, please provide the landed costs at for the different pipelines for receipt at Parkway.
- 14) Using the format in Appendix C for May 2015, please provide the landed costs at for the different pipelines for receipt at Iroquois (assuming ability to access gas via Wright on the Iroquois pipeline flowing north)
- If TCPL were to make a commitment to provide service from Waddington to Iroquois, would Enbridge consider accessing some of its portfolio for the Ottawa service territory at Iroquois? If not, why not?
  - Would 40 TJ/day be greater or less than the base load for the Ottawa service territory in the summer?

**REF: Exhibit A, Tab 3, Schedule 1, Appendix D, page 22, subsection d)**

- 15) Given Enbridge's date of filing and the time frames provided in PO 1 has Enbridge communicated risk that approval may not be received by Oct. 1st in request of the waiver?

- 13) Prior to August 11, 2014, what would have been the commercial consequences to Union to not entering into a binding precedent agreement (deposits, bid guarantee, etc.).
- 14) Specifically when did Union agree to an increase in capacity from 75,000 to 150,000 Dth/d?
- 15) Prior to signing the May 28, 2015 PA, what would have been the commercial consequences to Union to:
- a) Contract for 75,000 Dth/day
  - b) To not contract for any capacity?
- 16) When did Union provide notice of non-renewal to Alliance pipeline to cease capacity on that pipe from Empress?

**REF: Exhibit A, page 41, lines 6-8**

- 17) Using the same analysis, please estimate the savings if Union were to contract for 150,000 Dth/d at Niagara from TCPL?
- 18) Using the peak day analysis for 2017/8, please provide the Dawn to Parkway capacity (in GJ/day) that would “freed up” if an additional 150,000 Dth/day (158,258 GJ/day) was received at Kirkwall on a peak day (how much additional gas could leave Dawn and arrive at Parkway keeping all parameters constant with the exception of the incremental receipts at Kirkwall).
- 19) Was the Union Gas’ SENDOUT model used to assess the pipeline alternatives?
- a) If so, please provide a summary report of the results.
  - b) If not, why not?

**REF: Exhibit A, page 43, line 5**

- 20) How many pipelines converge to feed the receipt point at Kensington, Ohio?

**REF: Exhibit A, page 45, lines 15-16**

- 21) What rates did other anchor shippers receive? Please provide a range of rates (if appropriate, tied to volume commitment).
- 22) How does Union evaluate competitiveness in this context?

**REF: Exhibit A, page 48, lines 14-15**

23) How much additional pipeline capacity has Union identified for November 1, 2017?

**REF: Exhibit A, page 51, lines 16-19**

24) How does Union foresee the gas getting to Ontario in these interim arrangement?

25) How will ratepayers be protected while Union is gaining this experience?

**Ref: Exhibit A, Schedule 5 and EB-2014-0261, Exhibit B.OGVG\_FRPO\_CME.9(e)**

Preamble: In the EB-2014-0261 proceeding, Union stated that “When evaluating options for new transportation services Union considers all of its guiding principles including the impacts of the delivery point on Union’s facilities.”

26) Please explain how Union included the impact of the delivery point on Union’s facilities when comparing the TCPL Niagara to Kirkwall route, with delivery at Kirkwall, to the NEXUS/St. Clair route, with delivery at Dawn, in its landed cost analysis.

27) If an incremental gas supply resource is added for Union South, will the requirement for additional Dawn-Parkway transmission system facilities be less if the new supply is delivered at Kirkwall instead of Dawn?

28) What is the projected 100% load factor Union firm transportation charge from Dawn to Parkway for 2018 (demand rate and fuel)?

29) What is the projected 100% load factor Union firm transportation charge from Kirkwall to Parkway for 2018 (demand rate and fuel)?