

ENBRIDGE GAS INC.

Answer to Undertaking from
Pollution Probe (PP)

Undertaking

Tr: 141

To provide the 2022 and 2023 objectives for the director of energy transition role.

Response:

As summarized in Exhibit I.1.6-CCC-22, the Director of Energy Transition Planning is accountable for leading three teams at Enbridge Gas: Energy Transition Planning (ETP), Carbon Strategy, and Integrated Resource Planning (IRP). The roles and responsibilities for the teams are summarized in this interrogatory response.

The objectives for the Director of Energy Transition Planning team at Enbridge Gas for 2022 and 2023 are summarized below:

ETP Objectives for 2022:

- Develop an energy transition plan for Scope 3 emissions, including leading the development of the energy transition content of the 2024 Rate Rebasing filing
- Support the development of energy transition-related initiatives that reduce Scope 3 emissions
- Ensure on-going review of the Clean Fuel Regulation and determine appropriate actions and implementation for Enbridge Gas
- Evolve the Enbridge Gas energy transition governance structure for enhanced internal communications and decision making
- Ensure on-going compliance with the Federal Carbon Pricing Program and ensure remittances are submitted
- Ensure on-going compliance with federal/provincial carbon legislation, and continuous monitoring of carbon/climate related policies and regulations

ETP Objectives for 2023:

- Evolve Enbridge Gas's current system forecasting and planning processes to include monitoring, review and determination of possible energy transition assumptions that could be incorporated on an annual and/or LTC project-by-project basis

- Lead/support discussions with government on energy transition initiatives, including Ontario's Electrification and Energy Transition Panel (EETP)
- Engage with the electric sector regarding coordinated energy system planning, including the IESO and local distribution companies
- Evolve municipal, community, and Indigenous engagements, together with IRP team, to engage municipalities on energy transition, coordinated energy planning and IRP, and to demonstrate how Enbridge can play a role in energy transition and support municipal initiatives and their energy plans
- Ensure on-going provincial and federal carbon compliance activities are completed and continuous monitoring of carbon/climate related policies and regulations

Carbon Strategy Objectives for 2022:

- Lead GDS facility greenhouse gas (GHG) Emission Reduction Strategy to meet the 2030 GHG emissions intensity reduction targets, which includes:
 - Development and approval of the 3-year Scope 1 and 2 emission reduction plan and identification of new opportunities to advance the cost-effective reduction of emissions associated with GDS operations
 - Development of the governance structure for and lead scope 1 & 2 Emission Reduction Working Group for continued identification and implementation of GHG emission reduction opportunities
 - Development of the 2022 GDS Emission Reporting Dashboard
- Development and approval of the 2022 GHG Scorecard and Performance Metrics
- Completion of required Environmental, Social and Governance (ESG) and regulatory emissions reporting and auditing requirements

Carbon Strategy Objectives for 2023:

- Completion and approval of the 2030 Scope 1 and 2 GHG Emissions Reduction Strategy, which includes:
 - Development of the 3-year Scope 1 and 2 emission reduction plan
 - Development of a Budget Approval Process for new initiatives and funding criteria for Capital Allocation Committee (CAC) projects
- Development and approval of the 2023 Scorecard and Performance Metrics
- Completion of required Environmental, Social and Governance (ESG) and regulatory emissions reporting and auditing requirements

IRP Objectives for 2022:

- Fulfill IRP directives, decision outcomes and support Enbridge Gas's Leave-to-Construct (LTC) applications and Incremental Capital Module (ICM) requests, which includes:

- Development and implementation of IRP alternative (IRPA) pilots, in alignment with timelines agreed upon within the Technical Working Group (TWG)
- Review of the Distributed Cash Flow (DCF+) benefit cost analysis methodology and propose changes as required, in alignment with timelines agreed upon within the TWG
- File the IRP Annual Report, following the review of the TWG, with 2021 Deferral Disposition Application
- Development and implement Stakeholder Framework for use in regional engagements, IRP Pilots and future IRP projects
- Creation of an Asset Management Plan (AMP) IRP Appendix that includes a binary screen for all projects in the AMP and an IRPA evaluation for major projects following the rebasing evidence timelines
- Complete an IRP assessment and include assessment within LTC evidence for applicable projects
- Develop an incentive mechanism proposal for O&M based IRPAs and file as part of a pilot project or IRPA LTC

IRP Objectives for 2023:

- Fulfill IRP directives, decision outcomes, which includes:
 - Development and filing of an IRP pilot application for two IRPA pilots for implementation
 - File a non-pilot IRP Plan that includes a proposed Enbridge Gas DCF+ guidebook/methodology and proposed incentive mechanism proposal
 - File the IRP Annual Report, following the review of the TWG, with 2022 Deferral Disposition Application
 - Implementation of Enbridge Gas's Stakeholder Regional Engagement sessions
- Development of incentive mechanism proposal for Operation and Maintenance (O&M) based IRPA and file the proposal as part of a pilot project or IRPA LTC

Regulatory Objectives for 2023:

- Support the 2024 Rate Rebasing filing for Scope 1 and 2 emissions, IRP/Capital Plan, Energy Transition Plan – And support 2023 regulatory applications, both of which include:
 - File interrogatories and undertakings, support and participate in technical conferences, settlement conferences and oral hearings, as applicable.

ENBRIDGE GAS INC.

Answer to Undertaking from
Environmental Defence (ED)

Undertaking

Tr: 186

To indicate the number of homes that Enbridge has had to go into for reintroducing gas over the last three years and, to the extent the information is available, to break that down between outages, new connections, meter exchanges, and anything else, on a best-efforts basis.

Response:

The following chart presents the estimated¹ number of instances that Enbridge Gas has entered properties over the last three years for the purposes mentioned:

Table 1
Estimated Number of Properties Entered

Category/Year	2020	2021	2022
Unplanned Service Interruptions	65,562	71,748	91,453
Planned Service Interruptions	25,135	33,545	45,168
Meter Exchanges / Meter Work	148,729	129,026	160,981
Connections / Inspections	69,478	57,041	44,375
Total	308,904	291,360	341,977

Entry into customer properties is a standard day-to-day activity for Enbridge Gas that is enabled by established policies, procedures, business processes and operator qualifications.

¹ Data provided are estimates due to historically different coding and system requirements between the two legacy utilities.

ENBRIDGE GAS INC.

Answer to Undertaking from
School Energy Coalition (SEC)

Undertaking

Tr: 68

To provide Enbridge's understanding of what has driven the difference between the reference case we see here and reference case which underlies the capital plan.

Response:

Prior to the undertaking being taken, there was a great deal of discussion about Posterity's annual volume forecast analysis as highlighted in Exhibit K3.2, page 20 as compared to Enbridge Gas's current annual volume forecast as highlighted in Exhibit K3.2, page 18 (see Tr. Vol. 3 61 to 68).

Enbridge Gas would like to clarify a response given by Ms. Wade at Tr. Vol. 3 60 lines 22 to 23, where she confirms, subject-to-check, that the load forecast that is the basis of the capital plan is higher for every year of the rebasing period than the reference case. This is confirmed for the annual volume forecast, as was being discussed just prior to this statement; however, Enbridge Gas wishes to clarify that this annual volume forecast is not the basis of the capital plan, as Ms. Wade notes at TR. Vol. 3 69 lines 12 to 14.

Enbridge Gas's distribution design hour demand forecast, which underpins the capital plan, used the same reference case trends as those underpinning the Posterity analysis. These trends were applied to updated demands based on growth in customers, resulting in a different total design hour demand. Exhibit 1, Tab 10, Schedule 4, paragraph 26 to 32 explains what and how aspects of energy transition have been accounted for. Exhibit I.1.10-SEC-23 provides an updated figure showing the impacts on total system design hour demand from applying the Posterity reference case trends on a per customer basis. Posterity's reference case peak hour demand forecast is found at Exhibit I.1.10 SEC-31, Attachment 1 page 34. Comparing Posterity's reference case peak hour demand forecast to Enbridge Gas's distribution design hour forecast underpinning the capital plan shows that Enbridge Gas's design hour demand forecast is lower for every year of the rebasing period than Posterity's reference case peak hour demand forecast for the same time period. For example, in 2028 the difference is greater than 400,000m³/hour.

ENBRIDGE GAS INC.

Answer to Undertaking from
Pollution Probe (PP)

Undertaking

Tr: 16

On a best-efforts basis, to file the source information related to emission factors for the RNG as shown in the Enbridge RNG presentation table at Exhibit K3.4, page 46.

Response:

The figure presented in Exhibit K3.4, page 46 obtained from the November 15, 2022, Ontario Sustainable Energy Association presentation by Enbridge Gas was originally published in a working paper by the World Resources Institute¹ and is based on information obtained in 2020 from the California Air Resource Board (CARB) Low Carbon Fuel Standard Program (Ca LCFS).

Enbridge Gas would like to note that the figure does not show emission factors, rather it presents lifecycle carbon intensity (CI) values for various fuels registered in the Ca LCFS program. It is important to note that lifecycle CI values are different from emission factors and are not interchangeable terms. The lifecycle CI represents the GHG sources or sinks that occur across the full fuel lifecycle, from the point of fuel extraction to its end-use combustion.

The term emission factor refers to emissions released from the end use combustion of a fuel and does not include greenhouse gas (GHG) sources or removals, otherwise known as sinks, from the upstream production and transportation of a fuel. The emission factor for all types of renewable natural gas (RNG) is zero, as the carbon dioxide released from the end use combustion of RNG is biogenic (i.e., carbon dioxide emissions resulting from the decomposition or destruction of organic material, including those produced from the destruction of landfill gas, which are considered to be a natural part of the carbon cycle).²

¹ World Resources Institute. December 2020. Renewable Natural Gas as a Climate Strategy: Guidance for State Policy Makers. Pg. 7. <https://files.wri.org/d8/s3fs-public/renewable-natural-gas-climate-strategy.pdf>.

² Environment and Climate Change Canada. 2022. National Inventory Report 1990-2020: Greenhouse Gas Sources and sinks in Canada. Section A3.6.1 Emissions from Solid Waste Disposal (Landfills) Page 200. https://publications.gc.ca/collections/collection_2022/eccc/En81-4-2020-2-eng.pdf.

As demonstrated in the figure derived from the Ca LCFS program, the carbon intensity of RNG can vary significantly between types and individual projects, as it considers both avoided and produced emissions occurring over its lifecycle. Negative carbon intensity values for RNG can occur for projects that voluntarily capture methane that would have otherwise been released to the atmosphere. Landfill based RNG supplies often have positive carbon intensities as a result of regulations that require the collection and destruction of landfill gas (i.e., avoided methane emissions are not included in the carbon intensity calculation because it is a required activity). Where a landfill is not subject to landfill gas collection and destruction requirements and voluntarily collects landfill gas for production into RNG, the resulting carbon intensity would likely be negative due to the avoided methane emissions.

Enbridge Gas voluntarily reports Scope 3 emissions for end-use combustion only. This does not include any upstream emissions (such as from production and processing of natural gas or RNG) or any avoided upstream emissions (such as methane captured from RNG sources). Enbridge Gas uses the end-use combustion emission factors in the National Inventory Report for natural gas as specified for Ontario, which is 0.001932 tCO₂e/m^{3.3} Enbridge Gas also uses these end-use emission factors when reporting emission reductions from an RNG or hydrogen project.

³ Environment and Climate Change Canada. (2022, April 14). 2022 National Inventory Report 1990-2020: Greenhouse Gas Sources and Sinks in Canada. Part 2. Table A6.1-1 and Table A6.1-3.

ENBRIDGE GAS INC.

Answer to Undertaking from
Pollution Probe (PP)

Undertaking

Tr: 26

To advise as to whether the GHG reduction calculations in IR Pollution Probe 6 from EB-2022-0203 are expressed the way they are (reference: exhibit K3.4, page 48).

Response:

The estimated value of 110,000 tonnes of carbon dioxide equivalent (tCO₂e) per year expected greenhouse gas (GHG) emissions reduction presented in the Notice of Study Commencement and Virtual Information Session for the Proposed Ridge Landfill RNG Project was originally calculated and provided by the RNG producer.

Pollution Probe requested that the calculations used to determine this value be provided in the interrogatory for EB-2022-0203, Exhibit I.PP.6. Enbridge Gas provided the calculations based on the understanding of the producer's intention to potentially direct this RNG to vehicles. The estimated emissions reduction value was calculated using end-use emission factors and is meant to represent the avoidance of tailpipe emissions that will occur if those vehicles use RNG instead of gasoline.

The Proposed Ridge Landfill RNG Project Notice of Commencement and Virtual Information Session also aimed to contextualize the amount of RNG this project would produce by expressing the amount of GHG reductions in terms of "number of homes". The number of homes was determined based on the amount of RNG and the average use of natural gas per home per year. The comparison to homes did not use the emissions reductions calculation for RNG used to displace gasoline.

ENBRIDGE GAS INC.

Answer to Undertaking from
Ontario Energy Board Staff (STAFF)

Undertaking

Tr: 130

Provide a policy or a document that speaks to Enbridge's approach to additionality in the context of RNG procurement.

Response:

Enbridge Gas does not have a policy that speaks to the Company's approach to additionality in RNG procurement.

At Tr. Vol. 4 page 127, Enbridge Gas's witness agreed that renewable natural gas (RNG) in the gas supply is only valuable as a safe bet in the context of the energy transition if it is based on the principle of additionality. Further discussion on additionality occurred between Enbridge Gas witnesses and Commissioner Moran starting at Tr. Vol. 4 page 133. Enbridge Gas would like to clarify its testimony in these exchanges.

Enbridge Gas understands additionality to be defined as "a criterion for assessing whether a project has resulted in GHG emission reductions or removals in addition to what would have occurred in its absence."¹ As noted in the GHG protocol, additionality "is an important criterion when the goal of the project is to offset emissions elsewhere".² The replacement of natural gas with RNG in the gas distribution system is not considered, and is different than, an offset; it is a direct reduction of an end-user's Scope 1 GHG emissions, which would be considered as a Scope 3 GHG reduction for Enbridge Gas. Enbridge Gas, therefore, does not agree with Mr. Millar that additionality should be considered when procuring RNG for injection into the natural gas supply.

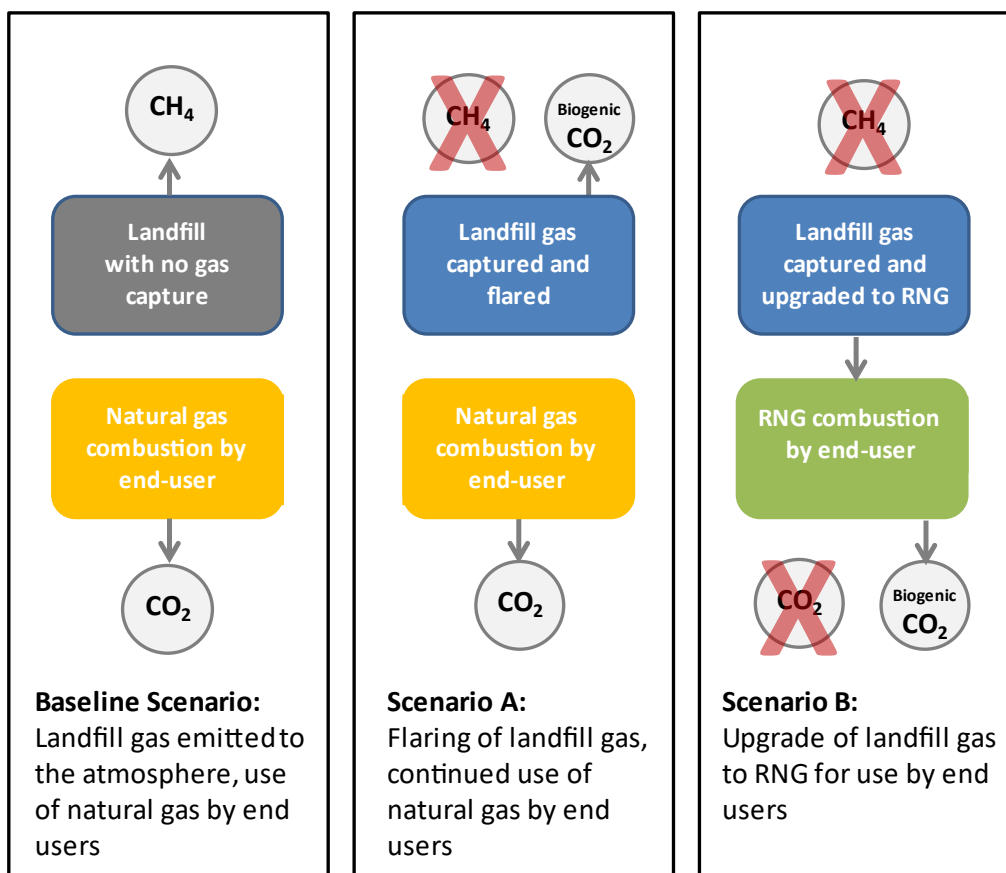
To provide further clarity on when additionality is and is not considered, Enbridge Gas is providing additional context around the two separate and distinct GHG benefits that can be realized when landfill gas is captured and used as a source to create RNG. As shown in Figure 1, the two GHG benefits that occur are:

¹ World Resources Institute. "The Greenhouse Gas Protocol". 2005, pg. 96.
<https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf>

² Ibid

1. Avoided release of methane to the atmosphere
2. Avoided carbon dioxide emissions from the displacement of natural gas.

Figure 1 – Double Benefit from the Creation and Use of RNG



Benefit 1 – Avoided Release of Methane to the Atmosphere

Capturing landfill gas, which is predominantly methane, and destroying it through combustion instead of allowing it to be released to the atmosphere provides the first GHG benefit. This GHG benefit occurs whether the landfill gas is flared or used to generate useful energy such as electricity or RNG. Offset credits can be created for the amount of GHG emissions savings related to the avoided methane emissions, where applicable offset regulations or voluntary offset programs exist. For example, as discussed at Tr. Vol. 4136, the federal GHG Offset Regulations³ allow for the creation of offset credits from landfill gas projects under the Landfill Methane Recovery and Destruction Protocol (Landfill Destruction Protocol). Projects creating offset credits under this protocol must demonstrate that the landfill is not required by law to capture

³ Government of Canada. (2022, May 20). Canadian Greenhouse Gas Offset Credit System Regulations, SOR/2022-111. <https://gazette.gc.ca/rp-pr/p2/2022/2022-06-08/html/sor-dors111-eng.html>

and destroy the landfill gas, which is a requirement in the protocol to ensure additionality.

Enbridge Gas does consider additionality in the procurement of offset credits. For example, when Enbridge Gas procured offset credits for use as a compliance instrument under Ontario's Cap and Trade Program and the federal Output-Based Pricing System, the Company only procured offset credits that were considered additional as demonstrated by third-party verification, as required under the applicable regulations.

Benefit 2 – Avoided CO₂ Emissions from the Displacement of Natural Gas

When landfill gas is captured, cleaned and injected into the gas distribution system as RNG, a second GHG benefit is realized. Each cubic meter of RNG displaces a cubic meter of natural gas, and the associated amount of carbon dioxide that is released to the environment from natural gas combustion is avoided. Because the carbon dioxide released from the combustion of RNG is biogenic⁴ (i.e., carbon dioxide emissions resulting from the decomposition or destruction of organic material, including those produced from the destruction of landfill gas, which are considered to be a natural part of the carbon cycle) no net additional carbon dioxide is created. Where the landfill gas is flared instead of upgraded to RNG, this second benefit would be a lost opportunity for emissions reductions as natural gas would have been combusted by the end-user instead.

The displacement of natural gas with RNG provides savings from carbon pricing for homeowners and business in Ontario as the carbon dioxide emissions from the combustion of RNG are exempt from both the Federal Carbon Charge under the Greenhouse Gas Pollution Pricing Act⁵ (GGPPA) and the Ontario Emissions Performance Standards^{6 7} (EPS). Neither the GGPPA or EPS require the RNG to meet any additionality requirements to recognize the GHG reductions and avoided costs.

⁴ Environment and Climate Change Canada. 2022. National Inventory Report 1990-2020: Greenhouse Gas Sources and sinks in Canada. Section A3.6.1 Emissions from Solid Waste Disposal (Landfills) Page 200. https://publications.gc.ca/collections/collection_2022/eccc/En81-4-2020-2-eng.pdf

⁵ Greenhouse Gas Pollution Pricing Act, S.C. 2018, c.12, s.186. Section 8, subsection 7; Natural gas that contains biomethane. <https://laws-lois.justice.gc.ca/eng/acts/G-11.55/FullText.html>

⁶ O. Reg. 241/19: Greenhouse gas emissions performance standards. <https://www.ontario.ca/laws/regulation/190241#BK21> references the verification amount set out in the report prepared under the O. Reg 390/18

⁷ O. Reg 391/18: Greenhouse gas emissions: quantification, reporting and verification. Section 12, subsection 2.

ENBRIDGE GAS INC.

Answer to Undertaking from
School Energy Coalition (SEC)

Undertaking

Tr: 73

Enbridge to file information related to capacity bids and awards for offer completed after 4 p.m. on July 25, 2023; to include relating to Enbridge's own in-franchise customers; to include information as to the length of the contract that Enbridge Gas gas supply bid into the open season.

Response:

Please see Exhibit J7.9 for the bid information and bid documents.

ENBRIDGE GAS INC.

Answer to Undertaking from
School Energy Coalition (SEC)

Undertaking

Tr: 80

Enbridge to advise whether since 2013 the capacity that has been bid into reverse open season bids is enough to not require any builds that Enbridge otherwise would have expected.

Response:

Bids received in reverse open seasons since 2013 have not been sufficient enough to eliminate the need for the new facilities.

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking

Tr: 164

Enbridge to confirm how many days has the Dawn-Parkway System reached peak Dawn-Parkway capacity requirements in the last five years.

Response:

The peak day demand did not reach the capacity of the Dawn Parkway System over the period from Winter 2009/2010 to Winter 2021/2022. Please see Exhibit I.2.7-ED-113, part c), Table 1, columns (i) and (iii) for the peak day demand and the capacity for each year.

ENBRIDGE GAS INC.

Answer to Undertaking from
Industrial Gas Users Association (IGUA)

Undertaking

Tr: 168

Enbridge to file its bid document, as described in undertaking J7.8.

Response:

Enbridge Gas interprets this question to be referring to Exhibit J7.4 instead of Exhibit J7.8.

The detailed results and related bid documents for a non-binding open season are confidential and considered competitive market information by both Enbridge Gas and other bidders in the open season. However, Enbridge Gas is able to provide the bid documents requested since the only bids received in the non-binding open season were from Enbridge Gas on behalf of its in-franchise customers.

Enbridge Gas submitted two non-binding bids on behalf of in-franchise customers in the Dawn to Parkway new capacity open season which closed on July 18, 2023:

- 1) 18,876 GJ/d for the EGD rate zone, starting as early as November 1, 2024. This capacity is intended to serve forecasted in-franchise design day growth in the Enbridge CDA. Attachment 1 is the bid form submitted by Enbridge Gas for this capacity.
- 2) 23,665 GJ/d for the Union South rate zone, starting November 1, 2027. Enbridge Gas bid smaller capacity amounts that align with forecasted demand for each year starting November 1, 2024, to serve growth in Dawn to Parkway system requirements for Union South in-franchise customers. Attachment 2 is the bid form submitted by Enbridge Gas for this capacity.

Enbridge Gas requires the capacity in the first bid using both the existing design day methodology and the design day methodology as outlined in the Settlement Proposal. Therefore, the first bid was not conditional upon the OEB's review of the Settlement Proposal.

The second bid was submitted with a condition precedent indicating the bid volume and timing is subject to change based on the outcome of the OEB's review of the Settlement Proposal in this proceeding. The bid amount was based on existing design day methodologies. There is no forecasted incremental Dawn to Parkway requirement for the Union South rate zone using design day methodologies outlined in the Settlement Proposal. Therefore, upon OEB approval of the Settlement Proposal, Enbridge Gas will withdraw its second bid in its entirety.

Enbridge Gas's bid forms included a 15-year term in order to be compliant with the open season bid process. However, since Enbridge Gas does not contract with itself for this capacity, the capacity is not actually subject to any term requirements. Instead, in-franchise customers are assumed to have rights to the capacity in perpetuity and Enbridge Gas would provide 24-months' notice should it wish to turn back capacity in the future.

On July 25, 2023, Enbridge Gas awarded both bids in their entirety, noting the condition precedent in the second bid.



July 18, 2023

BID FORM

**Enbridge Gas Inc. New Capacity Open Season
M12 or M12X Firm Transportation Service**

Please complete and submit this bid form no later than 2 p.m. ET/ 1 p.m. CT on July 18, 2023 and return via email to EnbridgeGas_STSales@enbridge.com.

Contact Information	
Corporate Name:	Enbridge Gas Inc. Operating as Enbridge Gas Distribution
Contact Person (Shipper Rep):	John Gillis
Title:	Senior Buyer
Telephone:	519-436-4657
Email Address:	John.gillis@enbridge.com
Service Parameters	
Receipt Point:	Dawn
Delivery Point:	Parkway
Term (minimum 15- year term):	15 yrs
Start Date:	November 1, 2027
End Date*:	October 31, 2042
Requested Early Start Date:	November 01, 2024
Quantity (GJ/d):	18,876 GJ/d
Conditions Precedent (if any):	

- *must be a minimum of 15 years from Nov. 1, 2027.

By participating in this Open Season, subject to Enbridge Gas's acceptance and notification of quantities allocated to shipper, shipper hereby irrevocably commits to execute the Firm M12 Transportation Contract with Enbridge Gas on the price, term and capacity as outlined above. If the above event does not occur within 60 days of delivery by Enbridge Gas of written notice to shipper, Enbridge Gas may, in its sole discretion, elect by written notice to shipper within 15 days thereafter, to terminate shipper's participation in this Open Season.



July 18, 2023

BID FORM

**Enbridge Gas Inc. New Capacity Open Season
M12 or M12X Firm Transportation Service**

Please complete and submit this bid form no later than 2 p.m. ET/ 1 p.m. CT on July 18, 2023 and return via email to EnbridgeGas_STSales@enbridge.com.

Contact Information	
Corporate Name:	Enbridge Gas Inc. Operating as Union Gas
Contact Person (Shipper Rep):	John Gillis
Title:	Senior Buyer
Telephone:	519-436-4657
Email Address:	John.gillis@enbridge.com
Service Parameters	
Receipt Point:	Dawn
Delivery Point:	Parkway
Term (minimum 15- year term):	15 yrs
Start Date:	November 1, 2027
End Date*:	October 31, 2042
Requested Early Start Date:	11/01/2024: up to 3,975 GJ/d; 11/01/2025: up to 10,560 GJ/d; 11/01/2026 up to 17,125 GJ/d;
Quantity (GJ/d):	11/01/2027 - 10/31/2042 23,665 GJ/d
Conditions Precedent (if any): Bid volume and timing is subject to the outcome of the OEB's review of the EB-2022-0200 Settlement Agreement.	

- *must be a minimum of 15 years from Nov. 1, 2027.

By participating in this Open Season, subject to Enbridge Gas's acceptance and notification of quantities allocated to shipper, shipper hereby irrevocably commits to execute the Firm M12 Transportation Contract with Enbridge Gas on the price, term and capacity as outlined above. If the above event does not occur within 60 days of delivery by Enbridge Gas of written notice to shipper, Enbridge Gas may, in its sole discretion, elect by written notice to shipper within 15 days thereafter, to terminate shipper's participation in this Open Season.