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McCarthy Tétrault **ONTARIO ENERGY BOARD**

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DELIVERED

April 13, 2009

13/4/09
Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

EB-2008-0219

OEB BOARD SECRETARY	
File No:	Sub File: <i>9</i>
Panel:	<i>PN, DB, B, DC</i>
Licensing:	<i>CS</i>
Other:	
CO/D4:	<i>NC</i>

Dear Ms. Walli:

**Re: Enbridge Gas Distribution Inc. – Phase 2
Shell Energy Interrogatories for TCPL
Board File No. EB-2008-0219**

Please find attached the interrogatories of Shell Energy with respect to evidence submitted by TransCanada PipeLines Ltd. in the above noted proceeding.

Yours very truly,

McCarthy Tétrault LLP

Kristyn Annis
Per: Kristyn Annis

C: Paul Kerr, Shell Energy
Enbridge Gas Distribution Inc. (via email only)
Norm Ryckman (EGD)
Fred Cass (Aird & Berlis)
Intervenors (via email only)

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IN THE MATTER OF the *Ontario Energy Board Act 1998*, S.O. 1998, c.15, Schedule B;

AND IN THE MATTER OF an Application by Enbridge Gas Distribution Inc. for an Order or Orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission and storage of gas commencing January 1, 2009.

INTERROGATORIES OF SHELL ENERGY NORTH AMERICA (CANADA) INC. (“SHELL ENERGY”) TO TRANSCANADA PIPELINES LTD. (“TCPL”)

No.	Interrogatory
1.	<p>Exhibit L, Tab 21, p. 7 and 20, Table 1 and Table 5</p> <p>Table 1 sets out the Long Term Firm Contracts to EGD’s delivery areas. Table 5 establishes peak and daily deliveries to the EGD, Victoria Square #2 and Goreway CDAs. This interrogatory seeks to compare this more recent information to historical information, particularly, information that set the context for EGD’s 1995 supply plan, and history since that time.</p> <p>Please provide the information produced in Table 1 for the years 1990, 1995, 2000, 2005 and projected for 2015.</p> <p>Please provide the information represented in Table 5 for 1990, 1995, 2000, 2005 and projected for 2015.</p> <p>Please provide any long-term forecasts, studies, or reports of gas commodity flows and service category needs to the EGD delivery areas that have been prepared by, or for, TCPL since 1995.</p>
2.	<p>Exhibit L, Tab 21, p. 10, Q9/A9</p> <p>The evidence refers to capacity contracted for by the three electricity generators; Portlands Energy Centre, Goreway Station Partnership, and Thorold.</p> <p>Please advise whether the capacity in Tables 1 and 4 include this contracted capacity. If not, please update the Tables 1 and 4 to include this contracted capacity.</p>

No.	Interrogatory
3.	<p data-bbox="280 342 740 373">Exhibit L, Tab 21, p. 10-11, Q9/A9</p> <p data-bbox="280 411 1382 653">The evidence refers to capacity contracted for by the three electricity generators (Portlands Energy Centre, Goreway Station Partnership, and Thorold) representing a total of 309,500 GJ/d of incremental and long-term firm transportation contracts as well as the proposed 1750 MW gas-fired electricity generating facility in the GTA (collectively, the “GFGs”). The evidence states that, “when these plants are running on a cold winter day, the amount of capacity available on TransCanada for STFT, Diversions and/or IT to Enbridge’s franchise area will be substantially reduced.”</p> <p data-bbox="280 693 1333 758">Separately and for each of the GFGs, please provide the estimated peak and average daily deliveries for 2009 and 2015.</p> <p data-bbox="280 795 1365 1073">Assuming that the proposed 1750 MW gas fired power plant will also contract for FT-SN, please advise whether these FT-SN contracts have led, or will lead, to system design or maintenance changes and, if so, describe the nature of the changes. In particular, please confirm that TCPL has constructed or will be constructing incremental facilities to increase the capacity on TransCanada to meet the needs of the GFGs and if not, why not. If there has been no capacity increase, please quantify or describe the relative levels of security or certainty of delivery resulting from the changes.</p> <p data-bbox="280 1110 1365 1213">Regarding the estimated additional 350,000 GJ/d future requirements, what are the expected receipt and delivery points and service types to meet these needs? And what system design or investment requirements would they prompt?</p>
4.	<p data-bbox="280 1260 703 1291">Exhibit L, Tab 21, p. 10, Q8/A8</p> <p data-bbox="280 1329 1341 1423">The evidence states that capacity for discretionary services cannot be assured given planned maintenance and unplanned facility upsets. It also refers to the removal and conversion of facilities.</p> <p data-bbox="280 1461 1341 1526">Please provide an example of how the maintenance of the facilities has an impact on available firm and discretionary capacity.</p> <p data-bbox="280 1564 1360 1629">Please advise whether planned maintenance is carried out during the winter season, or during the anticipated peak day.</p> <p data-bbox="280 1667 1382 1732">Please advise whether TCPL maintenance of its assets will be diminished due to lack of FT contracting.</p> <p data-bbox="280 1770 1295 1835">Please advise whether unplanned facility upsets have an impact on both firm and discretionary services.</p> <p data-bbox="280 1873 1382 1938">Please advise whether removing facilities from service or conversion of facilities require regulatory approval or, more generally, notice to shippers on the system. Please</p>

No.	Interrogatory
	describe the nature and timing of approvals and notices required.
5.	<p>Exhibit L, Tab 21, pp 11-12, Q12/A12</p> <p>The evidence refers to the restrictions on discretionary services.</p> <p>Please advise what the revenues have been for discretionary services for the years 1990, 1995, 2000, 2005, the first quarter of 2009 and projected for 2015.</p> <p>Please advise whether TCPL is entitled to keep all of the revenues from discretionary services or is required to apply all or some of these revenues for the benefit of TCPL customers.</p> <p>For the years noted above:</p> <p style="padding-left: 40px;">Please provide the costs of equipment maintenance or replacement that was needed to maintain system capacity at levels necessary to earn the revenues from firm services.</p> <p style="padding-left: 40px;">Please provide the costs of equipment maintenance or replacement that was needed to maintain system capacity at levels necessary to earn the revenues from discretionary services.</p>
6.	<p>Exhibit L, Tab 21, p. 14, Q16/A16</p> <p>The evidence states that the “additional revenue from incremental long-haul FT contracts and flow would result in lower tolls for customers across the system, including existing customers in Enbridge’s franchise areas.”</p> <p>Is this statement referring to FT contract shippers, or more broadly to EGD customers receiving utility commodity supply?</p> <p>Please provide an estimate of the additional revenues from incremental long haul FT if EGD’s proposal is accepted. Please specify the components of the increased revenues. If TCPL is only able to provide a range of potential revenues, please do so, specifying the components of the increased revenues and the factors influencing the range. Please produce any documentation that TCPL has prepared that may relate to expected, anticipated or estimated revenues resulting from EGD’s proposal.</p>
7.	<p>Exhibit L, Tab 21, p. 20, Table 5.</p> <p>Table 5 sets out the capacities and percentages of peak and average daily capacity for deliveries to EGD delivery areas.</p> <p>Please revise the table to indicate the revenues that accompanied each of the firm and</p>

No.	Interrogatory
	<p>discretionary services that used this capacity.</p> <p>Please advise what the TCPL revenues would have been if firm capacity had been contracted according to EGD's proposal.</p>