

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-2015-0166/0175

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| Panel | CS, C, MM, IR |
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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 1st?
 - 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)?