

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO
TCPL INTERROGATORY #3

INTERROGATORY

Issue A1

Reference(s) (i) Exhibit E, Tab 3, Schedule 5, Page 26, Paragraph 55, May 15, 2013
Update

Preamble

In the May 15 update, EGD stated that "Planning for [Mainline] discretionary services would not be a prudent course of action

Request

- (a) The referenced statement has been removed in subsequent updates. Please explain why. Does EGD still believe that this statement is valid.
- (b) Has EGD contracted for all of its requirements on the Mainline? If not, please state the amounts that EGD will serve with discretionary service and with firm service (FT and/or FT-NR).

RESPONSE

- a) Enbridge has interpreted this interrogatory to be referencing Exhibit A, Tab 3, Schedule 5, Page 26, paragraph 55. As noted at Exhibit A, Tab 3, Schedule 9, paragraph 1, Enbridge has not updated all of the Schedules within Exhibit A, Tab 3.

The referenced statement is still valid.

- b) In providing this interrogatory response Enbridge has assumed that TransCanada is referring to contract requirements on the Mainline once the GTA Project facilities are in service.

Witness: J. Denomy

No, Enbridge has not contracted for all of its requirements on the Mainline for 2016. Please refer to the response the TCPL Interrogatory #9 at Exhibit I.A1.EGD (Update)TCPL.9 for an estimate of Enbridge's 2016 requirements on the Mainline with and without the GTA Project facilities in service.

Please note that the table provided at Exhibit I.A1.EGD (Update).TCPL.9 includes the assumption that Enbridge will retain some discretionary STFT service to meet peak day demand in 2016.

Given TransCanada's exercise of pricing discretion granted to them in the RH-003-2011 Decision, Enbridge expects it will be contracting for additional amounts of annual FT which is cheaper in terms of cost while providing greater operational and contractual flexibility relative to STFT. For example, monthly blocks of STFT have been priced at 1200% of the corresponding FT toll and winter blocks of STFT for service to the Enbridge CDA and Enbridge EDA have been priced at 290% of the corresponding FT toll. Due to the cost associated with STFT Enbridge recently informed the Board that it would contract for 38,000 GJ/d of long haul FT to the Enbridge CDA for the upcoming gas year. This capacity will be used to displace an equivalent amount of STFT that Enbridge would have contracted for per the Settlement Agreement in the System Reliability Proceeding (EB-2010-0231).

In addition Enbridge has determined that it will require additional short haul capacity to meet peak day demand in the Enbridge EDA of approximately 170,000 TJ/d. However, at this point in time it is unclear to Enbridge if TransCanada will be providing this short haul capacity on reasonable terms and at recourse rates. Enbridge, along with Union and Gaz Métro have filed a complaint with the NEB in relation to TransCanada's most recent New Capacity Open Season to address the issue of access to new capacity and associated tolls. This short haul capacity will be utilized to displace non-renewable firm transportation that Enbridge has contracted with TransCanada along with peaking supplies.