

FRPO INTERROGATORY #1

INTERROGATORY

Issue 1 – New Business Activities

REF: Exhibit B / Tab 1 / Schedule 1 / p. 4 #11 and 12

Preamble: In addition to Board Staff IR.1, we are interested in how EGD envisions this potential service as compared to Union Gas M13 and M16 services.

- 1) Please provide a comparison and/or contrast between EGD's proposed service and Union's M13 and M16 Rates. Please describe fully the similarities and differences.

RESPONSE

Union Gas' M13 rate pertains to a service that enables Ontario natural gas producers with a means to transport gas to Union Gas' Dawn Hub where it can be sold to any number of market participants. A corresponding balancing service takes the daily swing between production and market.

Union Gas' Rate M16 pertains to a bi-directional transportation service which provides third party, natural gas storage pool operators with transportation between their storage pool and Union Gas' Dawn Hub. The transport service allows the storage operator to offer their customers Dawn Hub based storage services.

Neither Union Gas' M13 nor M16 rate is comparable to the two rates Enbridge has asked the Board to approve in this proceeding. Enbridge's proposed Rate 400 pertains to a service the Company seeks to provide to parties wishing to upgrade raw biogas to pipeline quality renewable natural gas. Enbridge's proposed Rate 401 pertains to a service the Company seeks to provide enabling parties to inject pipeline quality renewable natural gas into its gas distribution system. As indicated in the Company's evidence at Exhibit B, Tab 1, Schedule 1, paragraph 50 "Once the RNG is in the Company's gas distribution system, Enbridge will enable the movement of that gas to a terminal location of the producer's choice through the various service offerings Enbridge provides its customers today." (Emphasis added).