

CBA INTERROGATORY #11

INTERROGATORY

2. Cost Consequences:

2.4. What are the appropriate terms and conditions of the Geothermal Energy Service Program, RNG Enabling Program – Upgrading Service, and RNG Enabling Program – Injection Service?

REF: Exhibit B/Tab 1 Schedule 1 page 7

PREAMBLE:

The Company proposes to offer RNG upgrading services on an optional basis. As such RNG producers will have the choice of upgrading biogas to pipeline quality themselves or having Enbridge perform this function for them. All RNG producers who wish to use Enbridge's distribution system to transport RNG will have to contract with Enbridge for RNG injection services. This will enable the Company to meet its responsibilities as a distributor of natural gas and ensure the safe and reliable distribution of RNG to market.

- a) Please explain why RNG Producers must use EGD's injection service as opposed to using a 3rd party for all or a part of the injection service? In answering please discuss each step in the injection process and why only EGD can provide that aspect of injection, or whether that aspect of the service could be provided by a third party.
- b) Does EGD directly inject all the gas that ends up in its system itself, or do third parties ever inject gas into the EGD system? If so please provide details.

RESPONSE

- a) Please see the Company's response to Board Staff Interrogatory #1 c) filed at Exhibit I.1.EGDI.STAFF.1.
- b) Enbridge directly injects all gas volumes into its gas distribution system through facilities owned, controlled and operated by the Company.