

BOMA INTERROGATORY #15

INTERROGATORY

Ref: Ibid, Page 17

- (a) How much Michigan storage does EGD hold, with what company(ies)?
- (b) Please explain how that gas is transported to the EGD service area, or to Tecumseh storage from the Michigan sites.
- (c) Has EGD utilized, transported to the franchise, any of the Michigan gas?
- (d) Is the availability of the gas in storage in Michigan "equally available" as gas stored at Union or Tecumseh, or are there deliverability or transportation constraints? Please compare "deliverability ratios" in Michigan storage to Tecumseh and Union ratios.
- (e) In general, are the market prices charged by Michigan storage providers higher or lower than those charged by Union Gas? Do they include transport to Dawn/Tecumseh, or must transport be acquired separately?

RESPONSE

- a) Enbridge currently has a contract with a storage provider located in Michigan. The Company is reluctant to provide the contract particulars as disclosing such information may create an impediment when the Company goes out into the marketplace to replace that storage contract upon expiry.

In response to BOMA # 17 at Exhibit I.D1.EGDI.BOMA.17, the Company has provided a copy of the RFP that was issued this fall for storage service commencing April 1, 2017. As shown on that RFP, the Company would entertain proposals whereby Enbridge would provide volumes at Dawn and receive volumes at Dawn.

- b) and c)

The Company does not hold transportation capacity to and from storage facilities in Michigan. The nature of the Company's contract for storage in Michigan is such that the storage entity receives gas from Enbridge at Dawn during the summer injection period and delivers gas to Enbridge at Dawn during the winter withdrawal period.

Witness: D. Small

Therefore, physical transportation forms part of this particular storage service and the Company does not contract for transportation capacity directly to move gas to/from storage in Michigan.

d) and e)

The Company has structured its third party storage contracts such that Enbridge will be entering the market place every year to replace a level of storage and by doing so can take advantage of updated market pricing and deliverability requirements.

As discussed in the response to part a) of this interrogatory, the Company is reluctant to provide information related to the prices charged on its various storage contracts.

As discussed in the response to parts b) and c) of this interrogatory, transport to Dawn/Tecumseh is not required due to the nature of the storage contract in question.

Witness: D. Small