

Attachment D

Deliverability Market Share and Market Concentration Analysis

Market Definition: Ontario, Michigan, New York and Pennsylvania

Line No.	Company	Notes	Total Deliverability Available for All Customers			Total Deliverability for Ex-Franchise		
			Deliverability (MMcf/d)	Market Share	HHI	Deliverability (MMcf/d)	Market Share	HHI
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
Physical Storage:								
<i>Duke Energy:</i>								
1	MHP Canada		120	0.4%		120	0.5%	
2	Union Gas	(1)	2,400	7.1%		1,125	4.7%	
3	Texas Eastern		694	2.0%		694	2.9%	
4	Total - Duke Energy		<u>3,214</u>	<u>9.5%</u>	90	<u>1,938</u>	<u>8.1%</u>	65
5	Aquila		85	0.3%	0	0	0.0%	0
6	Central New York Oil & Gas		500	1.5%	2	500	2.1%	4
7	CMS Energy	(2)	3,069	9.0%	82	0	0.0%	0
8	Dominion Resources		4,196	12.4%	153	4,014	16.7%	280
9	DTE Energy	(3)	4,189	12.3%	152	889	3.7%	14
10	El Paso Corp.		6,053	17.8%	318	6,053	25.2%	637
11	Enbridge Inc.	(4)	1,800	5.3%	28	0	0.0%	0
12	Equitable Resources		404	1.2%	1	404	1.7%	3
13	KeySpan		70	0.2%	0	70	0.3%	0
14	National Fuel Gas Co.		1,195	3.5%	12	1,195	5.0%	25
15	Nisource, Inc.		547	1.6%	3	547	2.3%	5
16	PAA/Vulcan Gas Storage		700	2.1%	4	700	2.9%	9
17	SEMCO Energy		244	0.7%	1	60	0.3%	0
18	Southern Union		398	1.2%	1	398	1.7%	3
19	Steuben Gas Storage Co.		60	0.2%	0	60	0.3%	0
20	T.W. Phillips Gas & Oil		62	0.2%	0	0	0.0%	0
21	Tribute Resources		11	0.0%	0	11	0.0%	0
22	Williams Companies		858	2.5%	6	858	3.6%	13
23	WPS Resources		100	0.3%	0	100	0.4%	0
24	Subtotal - Physical Storage		<u>24,540</u>			<u>15,858</u>		
Substitutes for Physical Storage:								
<i>Local Production</i>								
25	Ontario	(5)	36	0.1%	0	36	0.1%	0
26	Michigan		700	2.1%	4	700	2.9%	9
27	New York		126	0.4%	0	126	0.5%	0
28	Pennsylvania		539	1.6%	3	539	2.2%	5
<i>Capacity Release - Marketer Capacity</i>								
29	Proliance Energy	(6)	752	2.2%	5	752	3.1%	10
30	PSEG Energy Resources & Trade		563	1.7%	3	563	2.3%	6
31	Inergy Gas Marketing		490	1.4%	2	490	2.0%	4
32	Amerada Hess		467	1.4%	2	467	1.9%	4
33	Coral Energy Resources		324	1.0%	1	324	1.4%	2
34	Nexen		295	0.9%	1	295	1.2%	2
35	Virginia Power Energy Mktg		272	0.8%	1	272	1.1%	1
36	Tenaska		258	0.8%	1	258	1.1%	1
37	Constellation Energy		204	0.6%	0	204	0.9%	1
38	BP Energy		177	0.5%	0	177	0.7%	1
39	On-System Peakshaving	(7)	<u>983</u>	<u>2.9%</u>	8	<u>983</u>	<u>4.1%</u>	17
40	Subtotal - Substitutes		<u>6,185</u>			<u>6,185</u>		
41	Total Relevant Market		33,939	100.0%	885	23,981	100.0%	1119
42	Market Share of Top 4 Suppliers			52.0%			53.0%	

(1) Approximately 53% of Union Gas' storage is reserved for its franchise customers at cost-based rates.

(2) CEA has conservatively assumed that all of CMS Energy's storage is reserved for its LDC customers.

(3) Ex-franchise amounts for DTE Energy represent storage owned by DTE Gas Storage Company.

(4) It is CEA's understanding that most, if not all, of Enbridge's storage is reserved for its franchise customers and has conservatively reflected this assumption in the analysis presented above.

(5) US data based on dry natural gas production data from EIA, Natural Gas Annual 2004 (Released December 2005); Ontario data based on Ontario Oil, Gas and Salt Resources Library, "Industry Fast Facts: Ontario", data presented represents 2003 data.

(6) Estimated firm pipeline capacity held by marketers in the relevant geographic market on ANR Pipeline, Great Lakes Gas Transmission, Tennessee Gas Pipeline, Dominion Transmission, National Fuel Supply Corp., Panhandle Eastern and Trunkline Gas.

(7) Represents peakshaving capacity owned by LDCs in New York and Pennsylvania.

Sources: Intelligence Press, "Natural Gas Storage and LNG Facilities in the United States and Canada", 2004; FERC Filings; CEA research; Energy and Environmental Analysis, "Analysis of Competition in Natural Gas Markets for Union Gas Limited", October 28, 2004.

Attachment E

Deliverability Market Share and Market Concentration Analysis

Market Definition: Ontario, Michigan, New York, Pennsylvania, Ohio, Indiana and Illinois

Line No.	Company	Notes	Total Deliverability Available for All Customers			Total Deliverability for Ex-Franchise		
			Deliverability (MMcf/d)	Market Share	HHI	Deliverability (MMcf/d)	Market Share	HHI
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
Physical Storage:								
<i>Duke Energy:</i>								
1	MHP Canada		120	0.3%		120	0.4%	
2	Union Gas	(1)	2,400	5.3%		1,125	3.9%	
3	Texas Eastern		694	1.5%		694	2.4%	
4	Total - Duke Energy		3,214	7.1%	50	1,938	6.7%	45
5	Ameren Corp.		233	0.5%	0	0	0.0%	0
6	Aquila		85	0.2%	0	0	0.0%	0
7	Centerpoint Energy		30	0.1%	0	30	0.1%	0
8	Central New York Oil & Gas		500	1.1%	1	500	1.7%	3
9	Citizens Gas & Coke Utility		120	0.3%	0	0	0.0%	0
10	CMS Energy	(2)	3,069	6.8%	46	0	0.0%	0
11	Dominion Resources		5,779	12.7%	162	4,014	13.8%	191
12	DTE Energy	(3)	4,189	9.2%	85	889	3.1%	9
13	Dynegy		338	0.7%	1	0	0.0%	0
14	El Paso Corp.		6,053	13.3%	177	6,053	20.8%	435
15	Enbridge Inc.	(4)	1,800	4.0%	16	0	0.0%	0
16	Equitable Resources		404	0.9%	1	404	1.4%	2
17	KeySpan		70	0.2%	0	70	0.2%	0
18	Kinder Morgan Inc.		1,930	4.2%	18	1,930	6.6%	44
19	Loews Corp.		133	0.3%	0	0	0.0%	0
20	Midwest Gas Storage		50	0.1%	0	50	0.2%	0
21	National Fuel Gas Co.		1,195	2.6%	7	1,195	4.1%	17
22	Nicor Inc.		2,800	6.2%	38	0	0.0%	0
23	Nisource, Inc.		2,726	6.0%	36	2,644	9.1%	83
24	PAA/Vulcan Gas Storage		700	1.5%	2	700	2.4%	6
25	Peoples Energy		920	2.0%	4	0	0.0%	0
26	Robinson Engineering		10	0.0%	0	10	0.0%	0
27	SEMCO Energy		244	0.5%	0	60	0.2%	0
28	Southern Union		468	1.0%	1	468	1.6%	3
29	Steuben Gas Storage Co.		60	0.1%	0	60	0.2%	0
30	T.W. Phillips Gas & Oil		62	0.1%	0	0	0.0%	0
31	The Energy Cooperative		40	0.1%	0	0	0.0%	0
32	Tribute Resources		11	0.0%	0	11	0.0%	0
33	Vectren Corp.		200	0.4%	0	0	0.0%	0
34	Williams Companies		858	1.9%	4	858	3.0%	9
35	WPS Resources		100	0.2%	0	100	0.3%	0
36	Subtotal - Physical Storage		35,176			20,045		
Substitutes for Physical Storage:								
Local Production								
37	Ontario	(5)	36	0.1%	0	36	0.1%	0
38	Michigan		700	1.5%	2	700	2.4%	6
39	New York		126	0.3%	0	126	0.4%	0
40	Pennsylvania		539	1.2%	1	539	1.9%	3
41	Ohio		248	0.5%	0	248	0.9%	1
42	Indiana		9	0.0%	0	9	0.0%	0
43	Illinois		0	0.0%	0	0	0.0%	0
Capacity Release - Marketer Capacity								
44	Proliance Energy	(6)	752	1.7%	3	752	2.6%	7
45	PSEG Energy Resources & Trade		563	1.2%	2	563	1.9%	4
46	Energy Gas Marketing		490	1.1%	1	490	1.7%	3
47	Amerada Hess		467	1.0%	1	467	1.6%	3
48	Coral Energy Resources		324	0.7%	1	324	1.1%	1
49	Nexen		295	0.6%	0	295	1.0%	1
50	Virginia Power Energy Mktg		272	0.6%	0	272	0.9%	1
51	Tenaska		258	0.6%	0	258	0.9%	1
52	Constellation Energy		204	0.4%	0	204	0.7%	0
53	BP Energy		177	0.4%	0	177	0.6%	0
54	On-System Peakshaving	(7)	1,593	3.5%	12	1,593	5.5%	30
55	Subtotal - Substitutes		7,052			7,052		
56	Total Relevant Market		45,441	100.0%	674	29,035	100.0%	907
57	Market Share of Top 4 Suppliers			42.3%			50.5%	

(1) Approximately 53% of Union Gas' storage is reserved for its franchise customers at cost-based rates.

(2) CEA has conservatively assumed that all of CMS Energy's storage is reserved for its LDC customers.

(3) Ex-franchise amounts for DTE Energy represent storage owned by DTE Gas Storage Company.

(4) It is CEA's understanding that most, if not all, of Enbridge's storage is reserved for its franchise customers and has conservatively reflected this assumption in the analysis presented above.

(5) US data based on dry natural gas production data from EIA, Natural Gas Annual 2004 (Released December 2005); Ontario data based on Ontario Oil, Gas and Salt Resources Library, "Industry Fast Facts: Ontario", data presented represents 2003 data

(6) Estimated firm pipeline capacity held by marketers in the relevant geographic market on ANR Pipeline, Great Lakes Gas Transmission, Tennessee Gas Pipeline, Dominion Transmission, National Fuel Supply Corp., Panhandle Eastern and Trunkline Gas.

(7) Represents peakshaving capacity owned by LDCs in New York, Pennsylvania, Indiana and Illinois.

Sources: Intelligence Press, "Natural Gas Storage and LNG Facilities in the United States and Canada", 2004; FERC Filings; CEA research; Energy and Environmental Analysis, "Analysis of Competition in Natural Gas Markets for Union Gas Limited", October 28, 2004.