

ENBRIDGE

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VIA EMAIL and COURIER

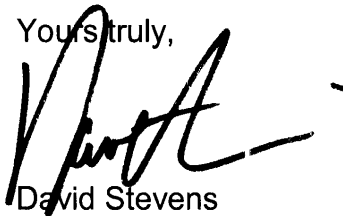
Mr. Peter O'Dell
Assistant Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Dear Mr. O'Dell:

Re: Board File No.: EB-2005-0551
Natural Gas Electricity Interface Review Issues and Storage Regulation
Undertakings of Enbridge Gas Distribution Inc.

Please find enclosed one CD and ten hard copies of Enbridge Gas Distribution's Undertakings given at the Technical Conference on April 27, 2006. A PDF searchable and Word format version have also been delivered to the Board electronically.

Yours truly,



David Stevens
Acting Senior Counsel, Regulatory

Attachment

cc: Mr. F. D. Cass, Aird & Berlis (via email and courier)
EB-2005-0551 Interested Parties (via email)

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #12

Undertaking

To provide a comparison of the high and low range scenario for the capital costs of the proposed storage build program (Reference: Exhibit C, Tab 1, Schedule 1, para. 45) (Tr. 14, April 27, 2006)

RESPONSE

In order for the Company to provide the full range of proposed services, a storage build estimated at \$26.2 million, excluding interest during construction and overheads, was prepared and filed in the original evidence. The cost estimate was formed based on posted prices and rates at the time and the historical cost trends within the construction industry. It represents a low range cost for the storage build.

Recent trends are showing upward cost pressures on both material and labour due to the escalating demand for each, driven by an increasing number of industrial and pipeline projects locally and across the country. This trend has caused a reduction in the accuracy of the estimate and resulted in an increase in cost range for the build.

Considering the above factors, costs could climb as high as + 30% beyond the original estimate, placing the high range cost of the storage build at \$34.1 million.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #13

UNDERTAKING

TO PROVIDE a comparison of the distribution portion of rates for Rate 100, 110, and 115 with Rate 300, using typical customers for each rate. (Tr. 16, April 27, 2006)

RESPONSE

Please see response to Undertaking # 31.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #14

UNDERTAKING

TO PROVIDE a high level analysis of the impact on Rate 100, 110, and 115 customers, assuming that the migration to Rate 300 is as forecast by Enbridge Gas Distribution and setting out any assumptions used. (Tr. 17, April 27, 2006)

RESPONSE

The Company performed a high level analysis to determine approximate impacts on all bundled customer classes assuming the migration of qualifying customers to Rate 300. The potential migration of one customer to Rate 125 was not factored into this analysis.

The table below summarizes the analysis' findings.

DESCRIPTION	RATE 1	RATE 6	RATE 9	RATE 100	RATE 110	RATE 115	RATE 135	RATE 145	RATE 170	RATE 200	RATE 300	RATE 305
Distribution Unit Rate Impact	\$ 0.0	\$ 0.0	\$ -	\$ 0.0054	\$ 0.0026	\$ -	\$0.0	\$0.0	\$0.0	\$0.0	\$ -	\$0.0
Percentage Impact on Distribution Unit Rate	0%	0%	0%	17.1%	17.3%	0%	0%	0%	0%	0%	n/a	0%
Percentage Impact on T-service Basis	0%	0%	0%	6.7%	4.5%	0%	0%	0%	0%	0%	n/a	0%

The analysis' findings show the impact of customer migration to Rate 300 would be limited to Rates 100 and 110. There is no impact on other rate classes.

Distribution unit rates for both Rate 100 and Rate 110 would increase by approximately 17%. The T-service impact on Rate 100 and Rate 110 would be approximately 6.7% and 4.5% respectively. The impact on Rate 115 is zero reflecting that all Rate 115 customers are forecast to migrate to Rate 300.

If actual customer migration is less than the forecast, the Company would credit bundled Rate 100, 110 and 115 customers for any over recovery from the increase in bundled rates. The proposed variance account would protect the existing rate classes and the Company from the impact of variances in customer take up of the proposed services.

Undertaking responses #30 and #31 describe in detail the assumptions the Company used to determine the number of customers migrating to Rate 300 and the associated margin

impact.

For the purpose of this undertaking response, the Company simulated migration of eligible Rate 100, 110 and 115 customers to Rate 300 based on the fully allocated cost study approved in the Final Board Order EB-2005-0001, which included the following adjustments / assumptions:

- Demand Side Management (“DSM”)-Peak costs were adjusted based on allocation percentages of contract demand volumes migrated between rate classes;
- DSM-Annual costs were adjusted based on the annual deliveries migrated between rate classes;
- Distribution costs were adjusted based on allocation percentages of contract demand volumes migrated between rate classes;
- Customer related costs were adjusted based on the number of customers migrated between rate classes;
- Distribution Commodity (i.e. Unaccounted for Gas) costs were excluded from the analysis.

The attached tables provide details of the above discussion. The first table provides rate class allocation of distribution and DSM cost as per the Final Board Order EB-2005-0001. The second table provides allocation of the same costs but with migration to Rate 300. The second table also shows calculation of distribution unit rate and percent impacts for each rate class.

Final Board Order EB-2005-0001

ALLOCATION OF TOTAL COST OF SERVICE Final Board Order EB2005-0001 (in millions)

ITEM NO.	DESCRIPTION	TOTAL	1	6	9	100	110	115	135	145	170	200	300	RATE 305	DIRECT PURCHASE
1.1	DSM- Peak	15.56	6.12	4.43	0.00	3.08	0.66	0.76	0.00	0.17	0.09	0.25	-	-	-
1.2	DSM - Annual and TS Revenue	6.63	2.43	1.69	0.00	0.82	0.38	0.59	0.03	0.14	0.44	0.09	-	-	-
1.3	Total Distribution	237.97	133.25	67.53	0.05	22.07	5.26	5.36	0.10	1.52	1.78	0.92	-	0.13	-
1.4	Commodity	19.27	7.31	5.08	0.01	2.25	1.04	1.61	0.09	0.39	1.21	0.24	-	0.05	-
1.5	Total Distribution excluding Commodity	218.70	125.94	62.44	0.04	19.82	4.23	3.75	0.02	1.12	0.57	0.68	-	0.09	-
1.6	Total Customer Related	298.54	236.82	47.17	0.58	8.05	1.76	0.75	0.28	0.83	0.55	0.07	-	0.01	1.56
1	Total Cost of Service: Distribution Only	539.42	371.32	115.73	0.63	31.78	7.03	5.85	0.33	2.36	1.66	1.08	-	0.10	1.56

ALLOCATION OF RETURN & TAXES Final Board Order EB2005-0001 (in millions)

ITEM NO.	DESCRIPTION	RETURN & TAXES	1	6	9	100	110	115	135	145	170	200	300	RATE 305
2.1	Total Distribution	128.55	77.18	34.26	0.02	11.31	2.43	2.04	0.01	0.61	0.33	0.29	-	0.06
2.2	Total Customer Related	140.37	110.80	25.07	0.84	2.34	0.54	0.16	0.15	0.30	0.21	(0.04)	-	0.00
2.3	Entrac	0.75	0.49	0.13	0.00	0.04	0.02	0.03	0.00	0.01	0.02	0.00	-	0.00
2.0	Total Return Tax Distribution only	269.67	188.47	59.47	0.86	13.70	2.99	2.23	0.16	0.92	0.57	0.25	-	0.06
3	Distribution Only with Return & Tax	809.10	559.79	175.20	1.49	45.48	10.02	8.08	0.48	3.28	2.23	1.33	-	0.16

ITEM NO.	DESCRIPTION	TOTAL	1	6	9	100	110	115	135	145	170	200	300	RATE 305
4	Total Annual Deliveries (in thousand m ³)	12,320	4,674,294	3,249,274	9,371	1,435,366	661,714	1,027,731	55,135	251,464	770,369	155,039	-	30,000
5	\$ per m3 of Deliveries		\$ 0.1198	\$ 0.0539	\$ 0.1595	\$ 0.0317	\$ 0.0151	\$ 0.0079	\$ 0.0088	\$ 0.0130	\$ 0.0029	\$ 0.0086	-	\$ 0.0054

Distribution Impact Analysis with Migration to Rate 300

ALLOCATION OF TOTAL COST OF SERVICE WITH MIGRATION TO RATE 300 (in millions):

ITEM NO.	DESCRIPTION	TOTAL	1	6	9	100	110	115	135	145	170	200	300	RATE 305	DIRECT PURCHASE	REFERENCE
1.1	DSM- Peak	15.56	6.12	4.43	0.00	2.03	0.13	-	0.00	0.17	0.09	0.25	2.34	-	-	DSM-Peak costs adjusted based on peak deliveries. Peak deliveries adjusted based on proration of contract demand of each rate class after migration.
1.2	DSM - Annual and TS Revenue	6.63	2.43	1.69	0.00	0.46	0.06	(0.00)	0.03	0.14	0.44	0.09	1.27	-	-	Adjustment to annual deliveries based on total R100, 110, 115 volumes qualified for migration to Rate 300.
1.3	Total Distribution	237.97	133.25	67.53	0.05	14.39	0.97	0.00	0.10	1.52	1.78	0.92	17.32	0.13	-	These costs adjusted based on contract demand volumes migrated between rate classes.
1.4	Commodity	19.27	7.31	5.08	0.01	1.25	0.17	(0.00)	0.09	0.39	1.21	0.24	3.47	0.05	-	Remove Commodity cost from the total distribution costs
1.5	Total Distribution excluding Commodity	218.70	125.94	62.44	0.04	13.14	0.81	0.00	0.02	1.12	0.57	0.68	13.85	0.09	-	Item 1.5 = Item 1.3 - Item 1.4
1.6	Total Customer Related	298.54	236.93	47.24	0.58	5.13	0.46	0.26	0.28	0.93	0.56	0.07	4.54	0.01	1.56	Customer related costs adjusted based on the number of customers migrated between rate classes.
1	Total Cost of Service Distribution only	539.42	371.42	115.80	0.63	20.76	1.45	0.26	0.33	2.36	1.66	1.08	22.01	0.10	1.56	Item 1 = Item 1.1 + Item 1.2 + Item 1.5 + Item 1.6

ALLOCATION OF RETURN & TAXES WITH MIGRATION TO RATE 300 (in millions):

ITEM NO.	DESCRIPTION	RETURN & TAXES	1	6	9	100	110	115	135	145	170	200	300	RATE 305
2.1	Total Distribution	128.55	77.18	34.26	0.02	7.46	0.46	0.00	0.01	0.61	0.33	0.29	7.85	0.06
2.2	Total Customer Related	140.37	110.80	25.07	0.84	1.46	(0.01)	(0.01)	0.15	0.30	0.21	(0.04)	1.59	0.00
2.3	Entrac	0.75	0.49	0.13	0.00	0.02	0.00	0.00	0.00	0.01	0.02	0.00	0.07	0.00
2	Total Return Tax Distribution only	269.67	188.47	59.47	0.86	8.95	0.46	(0.01)	0.16	0.92	0.57	0.25	9.52	0.06
3	Distribution Only with Return & Tax	809.10	559.89	175.27	1.49	29.71	1.91	0.25	0.48	3.28	2.23	1.33	31.52	0.16

Rate 100, 110 and 115 volumes adjusted based on total volumes qualified for migration to Rate 300. Under the proposed unbundled service, the Rate 305 customer will switch to Rate 300.

4	Total Deliveries (in thousand m ³)	12.320	4,674,294	3,249,274	9,371	800,520	107,537	(0)	55,135	251,464	770,369	155,039	2,216,775	30,000	-
5	\$ per m3 of Deliveries	\$ 0.1198	\$ 0.0539	\$ 0.1595	\$ 0.0371	\$ 0.0178	\$ -	\$ -	\$ 0.0088	\$ 0.0131	\$ 0.0029	\$ 0.0086	\$ 0.0142	\$ 0.0054	\$ -
6	Distribution Unit Rate Impact	\$ 0.0000	\$ 0.0000	\$ 0.0000	\$ 0.0054	\$ 0.0026	\$ -	\$ 0.0000	\$ 0.0000	\$ 0.0000	\$ 0.0000	\$ 0.0000	\$ 0.0142	\$ 0.0000	\$ 0.0000
7	Percentage Impact on Distribution Unit Rate	0%	0%	0%	17.1%	17.3%	0%	0%	0%	0%	0%	0%	n/a	0%	0%
8	Gas Supply Load Balancing Unit Rate				0.0499	0.0426									
9	T-service Impact (%)				6.7%	4.5%									

April 1, 2006 QRAM

Item 9 = Item 6 / (Item 5 Page 1 + Item 8)

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #15

UNDERTAKING

TO FILE the relevant Interrogatories from the Sithe Bypass Application discussing the meaning and application of “billing customer demand”. (Tr. 21, April 27, 2006)

RESPONSE

Board Staff Interrogatories #16 to #18 and #37 (Exhibit G, Tab1, Schedules #16 to #18 and #37) are attached. These responses provide the background and drivers for the introduction of “billing contract demand” as well as discuss its meaning and application.

Please note that in the above Interrogatory responses, the term “billing contract demand” is referred to as “the minimum contract demand over the horizon of the project”.

BOARD STAFF INTERROGATORY #16

INTERROGATORY

Reference: EGDl evidence A/3/2/p.4-5

Please describe and discuss how the proposed changes to EGDI's rate 125 address Sithe's needs for delivery service. Please identify and describe the commissioning year allowance proposed and provide the terms of the proposed rate schedule that provide this flexibility.

RESPONSE

Potential customers on Rate 125 have requested the following changes to Rate 125:

1. Flexibility with respect to the Contract Demand provisions, since customers may have a higher peak in the summer than the winter.
2. Flexibility with respect to the Unaccounted for Gas requirements, currently set at 1% of deliveries, particularly in the case of dedicated facilities, where metering losses may not be a cost incurred by the Company.

The proposal to introduce an authorized overrun charge addresses the first concern. The proposal to waive the unaccounted for gas requirement for dedicated facilities metered from a custody transfer meter addresses the second concern.

The proposed commissioning year allowance is contained in the proposed Rate 125 rate schedule as filed in the RP-2002-0133 proceeding dated 2002-10-08 under Exhibit H2, Tab 6, Schedule 1 in the "Authorized Demand Overrun" section, is attached.

RATE NUMBER	125	EXTRA LARGE FIRM TRANSPORTATION SERVICE
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APPLICABILITY:

To any Applicant who enters into a Service Contract with the Company to use the Company's natural gas distribution network for the transportation, to a single terminal location ("Terminal Location"), of a specified maximum daily volume of natural gas of not less than 609,000 cubic metres and a minimum annual volume of 200,000,000 cubic metres.

CHARACTER OF SERVICE:

Service shall be firm except for events as specified in the Service Contract including force majeure. The Applicant shall not take a volume of gas at the Terminal Location that varies, in any day, by more than two percent (2%) from the Delivered Volume. The hourly volume shall not exceed five percent (5%) of the Delivered Volume, without the Company's prior consent.

RATE:

The following rates and charges, as applicable, shall apply for deliveries to the Terminal Location.

Delivery Charge

Per cubic metre of Contract Demand per month 8.2125 ¢/m³

Direct Purchase Administration Charge \$480.00 Per Year *

* billed in the first month of the contract year.

AUTHORIZED DEMAND OVERRUN:

The following Authorized Demand Overrun Rate is applied to any quantities of gas transported in excess of the Contract Demand. Overrun will be authorized by the Company at its sole discretion.

Automatic authorization of transportation overrun will be given in the case of dedicated (or, sole-use) facilities to the Terminal Location provided that pipeline capacity is available.

Authorized Demand Overrun Rate 0.27 ¢/m³

The Authorized Demand Overrun Rate may be applied to commissioning volumes less than 200 million cubic metres per year at the Company's sole discretion, for a contractual period of one year or less.

MINIMUM BILL:

If during the contract year, the Applicant takes a quantity of gas less than the minimum applicable annual volume of 200 million cubic metres of gas on this rate class, then the Applicant will be billed for the difference between actual consumption and 200 million cubic metres at a rate of: 3.0 ¢/m³

TERMS AND CONDITIONS OF SERVICE:

1. The provisions of PARTS III and IV of the Company's HANDBOOK OF RATES AND DISTRIBUTION SERVICES apply, as contemplated therein, to service under this Rate Schedule.
2. The Applicant is required to provide the Company with Unaccounted for Gas equal to the forecast system average percentage times the volume that the Applicant is required to deliver to the Company. In the case of dedicated facilities where volume is measured from a custody transfer meter, the Unaccounted for Gas volume requirement is not applicable.
3. a) Any volume of gas taken by the Applicant on a day at the Terminal Location which exceeds the sum of:
 - i. any applicable Load Balancing Demand pursuant to Rate 310 or any applicable Storage Demand pursuant to Rate 315, plus

EFFECTIVE DATE:	IMPLEMENTATION DATE:	BOARD ORDER:	REPLACING RATE EFFECTIVE:	Page 1 of 2
October 1, 2002	October 1, 2002	RF-2002-0133	August 1, 2002	Handbook 19



BOARD STAFF INTERROGATORY #17

INTERROGATORY

Reference: EGDI evidence A/3/2/p.9

Regarding Rate 125, please describe the process and party responsible for determining that sufficient pipeline capacity exists. Please discuss how Authorized Demand Overrun will provide an electricity generator the desired flexibility. Please discuss how the contract demand for an electricity generator would be determined and whether a customer would be able to alter its contract demand.

RESPONSE

Enbridge Gas Distribution would authorize all overrun volumes up to and including the designed facilities' peak hourly flow rate. The maximum peak hourly flow rate would be contained in the contract between Enbridge Gas Distribution and the customer.

The introduction of Authorized Demand Overrun provision arose from discussions with Sithe and other potential customers that were contemplating to take service pursuant to Rate 125. In an evolving electricity market, it was felt that allowing Authorized Demand Overrun in a context relevant to an unbundled distribution rate would provide greater flexibility to the customer by allowing some adjustment to the daily requirements throughout the year and reduce the level of revenues that would otherwise be fully recovered through fixed demand charges.

The contract demand would be set such that over the horizon of the project, the annual revenues would recover the invested capital and O&M costs. However, based on the applicability section of Rate 125, the contract demand must be greater than 609 000 m³. Enbridge envisaged that the level of the established contract demand would be the minimum contract demand over the horizon of the project. Daily requirements over and above the contract demand quantity would be subject to the authorized demand overrun provision included in the proposed Rate 125 rate schedule.

BOARD STAFF INTERROGATORY #18

INTERROGATORY

Reference: EGD I evidence A/3/2/p.9

Regarding Rate 125, please discuss whether the proposed changes to rate 125 are supported by an average cost based cost allocation or a marginal cost based cost allocation and why. Please discuss whether seasonalized rates may be appropriate.

RESPONSE

The proposed changes to Rate 125 rely on the fully allocated costing principles that the Board has approved in the past. The authorized overrun charge is derived from the demand charge unitized at a 100% load factor. However the authorized overrun charge would provide flexibility in terms of setting the contract demand on the rate, hence allowing the rate to be closer to the customer's marginal cost of self supply, even though the derivation of the rate is based on fully allocated costing principles. The authorized overrun charge will also allow greater flexibility to meet differential summer and winter requirements. While seasonal rates are an alternative to the Company's proposal, they would require the Company to forecast summer and winter contract demands for customers on Rate 125, which is not known. Therefore the Company concludes that a seasonal rate is unlikely to be superior to the approach taken by the Company.

BOARD STAFF INTERROGATORY #37

INTERROGATORY

Reference: EGDI evidence A/3/2/p.1

Please confirm that all communications and negotiations between Sithe and Enbridge Gas Distribution have been documented in the evidence. If not, please provide complete descriptions of any other communications or negotiations.

RESPONSE

There were numerous formal and informal discussions over the last two years between Sithe and Enbridge Gas Distribution regarding distribution services. Discussions were also held between Sithe and Enbridge Inc, with regard to upstream services. The discussions were confidential and were not minuted. In addition, a number of the Enbridge employees involved in the discussions have moved on to other roles or employers. As a consequence, it is not possible to provide a complete description of all communications between Sithe and Enbridge Gas Distribution.

In general, the discussions with Enbridge Gas Distribution covered a number of issues but the primary concerns expressed by Sithe were related to the need for compression on the southern route, the cost for UFG, and Rate 125 as has been documented in both applications. As a result of these discussions and those with other potential merchant plant operators, Enbridge Gas Distribution applied for, and received, approval to remove the 90% load factor requirement from Rate 125.

After an evaluation of Sithe's filing, Enbridge Gas Distribution came to the conclusion that Sithe's preferred route (which had not been identified during Enbridge Gas Distribution's earlier work) was an acceptable alternate route to the southern route and it had the potential to resolve some of the Sithe's flexibility concerns (i.e. compression and UFG).

However, concerns about Rate 125 remained. The Company undertook a review of how Rate 125 could be administered differently so as to better align with a merchant plant operations and to be competitive with self service while still ensuring fairness to all ratepayers. Initially the Contract Demand ("CD") was designed for cost recovery over a 10-year project horizon. But, in order to reduce Sithe's annual cost exposure the project life was extended to 20 years with appropriate financial risk mitigation. Whenever demand exceeded the CD, the risk mitigation required by

Enbridge Gas Distribution would be reduced since recovery of costs would occur sooner. This approach has the company, its ratepayers and Sithe sharing in its success in return for a significantly lower CD than under Rate 125 as currently administered. This approach is also similar to the co-generation rate offered by Union. We have not had a formal response from Sithe to this offer. However, as outlined in its application and Interrogatory responses Sithe's position is that the facility should be at Sithe's avoided costs and it should not be required to contribute to the distribution system. On this latter point we disagree.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #16

UNDERTAKING

TO PROVIDE documentation to support or explain the 12% increase in transmission pressure costs between 2001 and 2006, which is noted at Exhibit C, Tab 2, Schedule 4, para. 3, along with the associated volumes. (Tr. 31, April 27, 2006)

RESPONSE

The Company is proposing to increase the Rate 125 Delivery Demand rate based on the increase in total company transmission pressure costs from 2001 relative to 2006. The 12% increase is based on the change in unit rates from 2001 to 2006 as depicted below.

EB- 2005-0001 (2006 FINAL RATE ORDER)

DESCRIPTION	RETURN	O&M COSTS	NET INV. COSTS	TOTAL COSTS	DELIVERY DEMAND TP	UNIT RATE
	(\$M)	(\$M)	(\$M)	(\$M)	(10 ⁶ m ³)	(cents/m ³)
Capacity TP	29.76	41.85	28.19	99.8	100.4491	99.3538

RP-2000-0040 (2001 FINAL RATE ORDER)

DESCRIPTION	RETURN	O&M COSTS	NET INV. COSTS	TOTAL COSTS	DELIVERY DEMAND TP	UNIT RATE
	(\$M)	(\$M)	(\$M)	(\$M)	(10 ⁶ m ³)	(cents/m ³)
Capacity TP	32.13	30.73	20.67	83.53	94.2045	88.6688

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #17

UNDERTAKING

TO PROVIDE calculations to support the Company's evidence that it will use 12% of the benefit from the storage build program to provide load balancing to Rate 125 customers and the statement that the storage volume to be used for load balancing is 24,747 10^3m^3 , as referenced at Exhibit C, Tab 2, Schedule 4, para. 5. (Tr. 32, April 27, 2006)

RESPONSE

The allocation of storage costs to Rate 125 is based on the percentage of the storage build which is required to provide load balancing. It is estimated that the Company will utilize 12% of the storage build program to provide load balancing service to Rate 125 customers. As stated at Exhibit B, Tab 3, Schedule 2, Page 1, the anticipated 2000 MW of generation capacity equates to a daily gas demand of 400 MMcfd. It is estimated that 200 MMcfd of incremental deliverability would come from storage. The load balancing provision under Rate 125 allows for 60% of daily contract demand for cumulative balancing (MCI) and 10% of MCI for daily balancing. Therefore, the 400 MMcfd of total demand is multiplied by 60% and 10% ($400 \times 60\% \times 10\%$) which equates to 24 MMcfd. 24 MMcfd over the 200 MMcfd of incremental deliverability available yields 12%.

The storage volume used to derive the cumulative imbalance charge is $24747 \times 10^3\text{m}^3$. The Company is proposing to recover the storage build costs attributable to Rate 125 load balancing provisions based on volumetric charges rather than demand charges. As such, in order to derive the appropriate total storage volume the Company had to make some reasonable assumptions about the amount of load balancing which would be required each day as well as the manner in which cumulative balances would accumulate. It was assumed that on average a Rate 125 customer would require the Company to load balance 5% of MCI (12 MMcf or $339 \times 10^3\text{m}^3$). Furthermore, there is a 50% probability that the balancing may be either positive or negative. Assuming that power generation customers operate for 146 days, this yields $24747 \times 10^3\text{m}^3$ ($339 \times 146 \times 0.5$).

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #18

UNDERTAKING

TO RECONCILE item 1.6 in column 1 of Exhibit C, Tab 2, Schedule 4, Appendix A, with item 5.4 of column 2 of Exhibit C, Tab 2, Schedule 4, Appendix B. (Tr. 42, April 27, 2006)

RESPONSE

Exhibit C, Tab 2, Schedule 4, Appendix A, item 1.6 represents 91% of the total Union Gas fuel costs depicted at Exhibit C, Tab 2, Schedule 4, Appendix B, item 5.4. The Union Gas fuel costs represent the fuel gas requirement which is required to match the level of contracted Union Gas Transmission demand (M12). The Company deems 9% of its contracted M12 capacity as depicted at Exhibit C, Tab 2, Schedule 4, Appendix B, item 5.1 as transportation related as this capacity is required to move gas from Vector Tranches 1 and 2 to meet firm service supplies. The remaining 91% of Union Gas fuel costs are required to transport gas in and out of storage.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #19

UNDERTAKING

To provide an explanation for the economies of scale which drive a declining delivery demand charge between 10% ratcheted or unratcheted service and 5% ratcheted or unratcheted service, as seen in the table at Exhibit C, Tab 3, Schedule 1, page 3. (Tr. 44, April 27, 2006)

RESPONSE

The decline in delivery demand charge between 10% ratcheted and unratcheted service and 5% ratcheted and unratcheted service is driven by the fact that the capital cost related to the storage enhancement required to provide each of the services does not increase proportionally to the benefits related to each of the services. In other words the 10% service provides twice the deliverability for a given amount of contracted storage space than is provided by a 5% service but the cost of the 10% service is less than double that of the 5% service.

The reason that capital costs do not climb at a proportional rate is because the storage build that is needed to support the 5% service will require an enhancement of something less than double in order to achieve the 10% service. For example, the cross sectional flow area of a pipeline can be doubled with less than a 100% increase in the diameter of the line resulting in a reduced cost per unit benefit for the higher level of service.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #20

UNDERTAKING

TO PROVIDE the detailed calculations supporting the derivation of the deliverability demand charge and annual storage costs of space for each of the storage build scenarios set out in the table at Exhibit C, Tab 3, Schedule 1, page 3. (Tr. 52, April 27, 2006)

RESPONSE

The attached illustrations provide detailed calculations supporting derivation of the deliverability demand charge and annual storage costs of space for each of the storage build scenarios. The base case scenario reflects 1.2% ratcheted service. The derivation of charges for each of the other scenarios builds on the base case scenario.

Page 1 shows classification of cost of service for the base case (1.2% ratcheted service) and derivation of daily demand for all other scenarios. The base case reflects the fully allocated cost study approved in the 2006 Board Order (EB-2005-0001) and includes the costs of 1.2% ratcheted service scenario. Changes to cost of service for all other scenarios are layered on top of the base case on an incremental basis in order to determine the high deliverability demand charges. In other words, the demand charge for the standard 1.2% deliverability is derived on a fully allocated basis, while the demand charges for high deliverability storage are determined on an incremental basis.

Page 2 shows the derivation of the demand charges for both space and deliverability using the above approach for 1.2%, 5% and 10% deliverability on a ratcheted and unratcheted basis.

Page 3 shows the derivation of annual storage costs assuming single cycle use, expressed in terms of annual cost per unit of space.

CLASSIFICATION OF COST OF SERVICE

Filed: 2006-05-08
 EB-2005-0551
 Undertaking #20
 Page 1 of 3
 Attachment

Line No.	EB-2005-0001 + 1.2 % Ratcheted				Reference
	Transmission & Compression		Pool Storage		
	Annual Demand	Daily Demand	Annual Demand	Daily Demand	
1.1	RATE BASE RETURN AMOUNT				
	Utility Return				Final EB-2005-0001, Ex. G2, T7, S3 + 1.2% Ratcheted cost of capital ⁶
	2,912.2	4,368.3	4,368.3	6,552.4	
	EXPENSES - OPERATION				
2.1.1	Labour				Final EB-2005-0001, Ex. G2, T7, S3 + 1.2% Ratcheted O&M Incremental
	497.6	746.5	117.4	176.1	
2.1.2	Supplies & Other				Final EB-2005-0001, Ex. G2, T7, S3
	63.9	95.9	6.7	10.1	
2.1.3	Hydro				Final EB-2005-0001, Ex. G2, T7, S3
	72.2	108.2			
2.1.4	Lease Rentals				Final EB-2005-0001, Ex. G2, T7, S3
			499.5	749.2	
2.1	Subtotal				
	633.7	950.6	623.6	935.4	
	MAINTENANCE				
2.2.1	Company				Final EB-2005-0001, Ex. G2, T7, S3
	166.3	249.4	17.4	26.2	
2.2.2	Contractor				Final EB-2005-0001, Ex. G2, T7, S3
	47.8	71.6	11.3	16.9	
2.2	Subtotal				
	214.1	321.0	28.7	43.1	
	ADMINISTRATIVE & GENERAL				
2.3.1	General Office				Final EB-2005-0001, Ex. G2, T7, S3
	687.2	1,030.7	162.1	243.2	
2.3.2	Service Fees				Final EB-2005-0001, Ex. G2, T7, S3
	240.7	361.1	56.8	85.2	
2.3.3	Overhead Capitalized				Final EB-2005-0001, Ex. G2, T7, S3
	(144.5)	(216.8)	(36.1)	(54.2)	
2.3	Subtotal				
	783.4	1,175.0	182.8	274.2	
	DEPRECIATION AND AMORTIZATION				
2.4.1	Depreciation				Final EB-2005-0001, Ex. G2, T7, S3 + 1.2% Ratcheted Depreciation & Amortization Cost ⁶
	978.5	1,467.7	1,015.5	1,523.2	
2.4.2	Amortization				Final EB-2005-0001, Ex. G2, T7, S3
			344.3	516.4	
2.4	Subtotal				
	978.5	1,467.7	1,359.8	2,039.6	
	TAXES - OTHER THAN INCOME				
2.5.1	Municipal				Final EB-2005-0001, Ex. G2, T7, S3 + 1.2% Ratcheted Municipal & Other Taxes ⁶
	429.7	644.6	101.4	152.1	
2.5.2	Capital				Final EB-2005-0001, Ex. G2, T7, S3
	127.8	191.7	180.9	271.4	
2.5	Subtotal				
	557.5	836.3	282.3	423.5	
2.	TOTAL EXPENSES				
	3,167.2	4,750.6	2,477.2	3,715.8	
3.	COST OF SERVICE (\$000)				
	6,079.4	9,118.9	6,845.5	10,268.2	
4	FORECASTED VOLUME (10 ³ M ³)				
	2,883,390	47,582	2,721,390	44,747	

	Col. 1	Col. 2 ¹	Col. 3 ²	Col. 4 ³	Col. 5 ⁴	Col. 6 ⁵
	1.2% Ratch Daily Demand	1.2% Unratch Incremental Change	5% Ratch Incremental Change	5% Unratch Incremental Change	10% Ratch Incremental Change	10% Unratch Incremental Change

<u>Transmission and Compression</u>							
5.1	Cost of service (\$000)	9,119	511	1,091	1,724	1,499	3,459
5.2	Forecasted Gas Volumes (10 ³ m ³)	47,582	-	2,153	2,153	4,986	4,986
<u>Pool Storage</u>							
6.1	Cost of Service (\$000's)	10,268	-	-	-	-	-
6.2	Forecasted Gas Volumes (10 ³ m ³)	44,747	-	2,153	2,153	4,986	4,986

Notes:

1. Incremental change in revenue & volume requirement between base case (1.2% Ratcheted) and 1.2% Unratcheted
2. Incremental change in revenue & volume requirement between base case (1.2% Ratcheted) and 5% Ratcheted
3. Incremental change in revenue & volume requirement between base case (1.2% Ratcheted) and 5% Unratcheted
4. Incremental change in revenue & volume requirement between base case (1.2% Ratcheted) and 10% Ratcheted
5. Incremental change in revenue & volume requirement between base case (1.2% Ratcheted) and 10% Unratcheted
6. Classification of costs for base case of 1.2% Ratcheted reflects methodology in EB-2005-0001 Final Board Order

DERIVATION OF THE DELIVERABILITY DEMAND CHARGE

Line No.	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	
			<u>Incremental Change</u>					
			¹	²	³	⁴		
	1.2% Ratch Daily <u>Demand</u>	1.2% Unratch Daily <u>Demand</u>	5% Ratch Daily <u>Demand</u>	5% Unratch Daily <u>Demand</u>	10% Ratch Daily <u>Demand</u>	10% Unratch Daily <u>Demand</u>	All Scenarios Annual <u>Demand</u>	
	<u>Transmission and Compression</u> ¹²							
1.	Cost of service (\$000)	9,119	9,630	1,091	633	1,499	1,960	6,079
2.	Forecasted Gas Volumes (10 ³ M ³)	47,582	47,582	2,153	2,153	4,986	4,986	2,883,390
3.	Unit Cost (\$/10 ³ m ³ /month) ¹⁰	15.9705	16.8660	42.2293	24.5093	25.0532	32.7602	0.1757
	<u>Pool Storage</u>							
4.	Cost of Service (\$000's)	10,268	10,268	10,268	10,268	10,268	10,268	6,846
5.	Forecasted Gas Volumes (10 ³ m ³)	44,747	44,747	46,900	46,900	49,733	49,733	2,721,390
6.	Unit Cost (\$/10 ³ m ³ /month) ¹⁰	19.1228	19.1228	18.2449	18.2449	17.2057	17.2057	0.2096
	<u>RATES (\$/10³m³)</u>							
7.	Monthly Demand Charge per unit of Annual Turnover Volume: ¹¹							0.3853
8.	Monthly Demand Charge per unit of Contracted Daily Withdrawal:	⁵ 35.0933	⁵ 35.9888					
9.	Incremental Charge over 1.2% of Contracted Daily Withdrawal:			⁶ 60.4742	⁷ 84.9835			
10.	Incremental Charge over 5% of Contracted Daily Withdrawal:					⁸ 42.2589	⁹ 75.0191	

Notes:

1. 5% Ratcheted - 1.2% Ratcheted (Transmission & Compression only)
2. 5% Unratcheted - 5% Ratcheted (Transmission & Compression only)
3. 10% Ratcheted - 1.2% Ratcheted (Transmission & Compression only)
4. 10% Unratcheted - 10% Ratcheted (Transmission & Compression only)
5. Line 3 + Line 6
6. Col. 3, Ln 3 + Col. 3, Ln 6
7. Col. 4, Ln 3 + Col. 3, Ln 9
8. Col. 5, Ln 3 + Col. 5, Ln 6
9. Col. 6, Ln 3 + Col. 5, Ln 10
10. Unit cost calculation = (cost x 1,000)/volume/12
11. Incremental costs for scenarios other than 1.2% Ratcheted are classified as Daily Demand. Accordingly Annual Demand Charge is same for all scenarios

DERIVATION OF ANNUAL STORAGE COSTS OF SPACE

Line No.	<u>Col. 1</u>	<u>Col. 2</u>	
	Assume 100 10 ³ m ³ of space		
	Scenario # 1- Ratcheted 1.2%	<u>(\$/ 100 10³m³)</u>	Unit Rate Reference
1.1	Space Charge (\$0.3853/10 ³ m ³ x 12 x 100)	462.36	Undertaking #20, Pg. 2, Col. 11, Ln. 7
1.2	Delivery Charge (1.2 x 12 x \$35.0933/10 ³ m ³)	505.34	Undertaking #20, Pg. 2, Col. 1, Ln. 8
	Injection Withdrawal Charge (200 10 ³ m ³ x \$2.6230/10 ³ m ³) ¹	524.6	Undertaking #22, Col. 1, Ln. 5
1.4	Subtotal @ 100 10 ³ m ³	<u>1,492.30</u>	
1.5	Unit rate per 10 ³ m ³	\$14.9230	Ln. 1.4/100
1.6	Unit Rate per GJ	\$0.3959	Ln. 1.5/37.69
	Scenario # 2- Unratcheted 1.2%	<u>(\$/ 100 10³m³)</u>	
2.1	Space Charge (\$0.3853/10 ³ m ³ x 12 x 100)	462.36	Undertaking #20, Pg. 2, Col. 11, Ln. 7
2.2	Delivery Charge (1.2 x 12 x \$35.9888/10 ³ m ³)	518.24	Undertaking #20, Pg. 2, Col. 2, Ln. 8
2.3	Injection Withdrawal Charge (200 10 ³ m ³ x \$2.6230/10 ³ m ³) ¹	524.6	Undertaking #22, Col. 1, Ln. 5
2.4	Subtotal @ 100 10 ³ m ³	<u>1,505.20</u>	
2.5	Unit rate per 10 ³ m ³	\$15.0520	Ln. 2.4/100
2.6	Unit Rate per GJ	\$0.3994	Ln. 2.5/37.69
	Scenario # 3- Ratcheted 5%	<u>(\$/ 100 10³m³)</u>	
3.1	Space Charge (\$0.3853/10 ³ m ³ x 12 x 100)	462.36	Undertaking #20, Pg. 2, Col. 11, Ln. 7
3.2	Delivery Charge (1.2 x 12 x \$35.0933/10 ³ m ³)	505.34	Undertaking #20, Pg. 2, Col. 1, Ln. 8
3.3	Incremental Delivery Charge for 5% (5.0-1.2 x 12 x \$60.4742/10 ³ m ³)	2,757.62	Undertaking #20, Pg. 2, Col. 3, Ln. 9
3.4	Injection Withdrawal Charge (200 10 ³ m ³ x \$2.6230/10 ³ m ³) ¹	524.6	Undertaking #22, Col. 1, Ln. 5
3.5	Subtotal @ 100 10 ³ m ³	<u>4,249.93</u>	
3.6	Unit rate per 10 ³ m ³	\$42.4993	Ln. 3.5/100
3.7	Unit Rate per GJ	\$1.1276	Ln. 3.6/37.69
	Scenario # 4- Unratcheted 5%	<u>(\$/ 100 10³m³)</u>	
4.1	Space Charge (\$0.3853/10 ³ m ³ x 12 x 100)	462.36	Undertaking #20, Pg. 2, Col. 11, Ln. 7
4.2	Delivery Charge (1.2 x 12 x \$35.9888/10 ³ m ³)	518.24	Undertaking #20, Pg. 2, Col. 2, Ln. 8
4.3	Incremental Delivery Charge for 5% (5.0-1.2 x 12 x \$84.9835/10 ³ m ³)	3,875.25	Undertaking #20, Pg. 2, Col. 5, Ln. 9
4.4	Injection Withdrawal Charge (200 10 ³ m ³ x \$2.6230/10 ³ m ³) ¹	524.6	Undertaking #22, Col. 1, Ln. 5
4.5	Subtotal @ 100 10 ³ m ³	<u>5,380.45</u>	
4.6	Unit rate per 10 ³ m ³	\$53.8045	Ln. 4.5/100
4.7	Unit Rate per GJ	\$1.4276	Ln. 4.6/37.69
	Scenario # 5- Ratcheted 10%	<u>(\$/ 100 10³m³)</u>	
5.1	Space Charge (\$0.3853/10 ³ m ³ x 12 x 100)	462.36	Undertaking #20, Pg. 2, Col. 11, Ln. 7
5.2	Delivery Charge (1.2 x 12 x \$35.0933/10 ³ m ³)	505.34	Undertaking #20, Pg. 2, Col. 1, Ln. 8
5.3	Incremental Delivery Charge for 10% (10.0-1.2 x 12 x \$42.2589/10 ³ m ³)	4,462.54	Undertaking #20, Pg. 2, Col. 7, Ln. 10
5.4	Injection Withdrawal Charge (200 10 ³ m ³ x \$2.6230/10 ³ m ³) ¹	524.6	Undertaking #22, Col. 1, Ln. 5
5.5	Subtotal @ 100 10 ³ m ³	<u>5,954.84</u>	
5.6	Unit rate per 10 ³ m ³	\$59.5484	Ln. 5.5/100
5.7	Unit Rate per GJ	\$1.5800	Ln. 5.6/37.69
	Scenario # 6- Unratcheted 10%	<u>(\$/ 100 10³m³)</u>	
6.1	Space Charge (\$0.3853/10 ³ m ³ x 12 x 100)	462.36	Undertaking #20, Pg. 2, Col. 11, Ln. 7
6.2	Delivery Charge (1.2 x 12 x \$35.9888/10 ³ m ³)	518.24	Undertaking #20, Pg. 2, Col. 2, Ln. 8
6.3	Incremental Delivery Charge for 10% (10.0-1.2 x 12 x \$75.0191/10 ³ m ³)	7,922.02	Undertaking #20, Pg. 2, Col. 9, Ln. 10
6.4	Injection Withdrawal Charge (200 10 ³ m ³ x \$2.6230/10 ³ m ³) ¹	524.6	Undertaking #22, Col. 1, Ln. 5
6.5	Subtotal @ 100 10 ³ m ³	<u>9,427.22</u>	
6.6	Unit rate per 10 ³ m ³	\$94.2722	Ln. 6.5/100
6.7	Unit Rate per GJ	\$2.5013	Ln. 6.6/37.69

Notes

1. 100 10³m³ for injection and 100 10³m³ for withdrawal

DERIVATION OF ANNUAL STORAGE COSTS OF SPACE

Filed: 2006-05-08
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 Attachment

Line No.	<u>Col. 1</u>	<u>Col. 2</u>	
	Assume 100 10 ³ m ³ of space		
	Scenario # 1- Ratcheted 1.2%	<u>(\$/ 100 10³m³)</u>	Unit Rate Reference
1.1	Space Charge (\$0.3853/10 ³ m ³ x 12 x 100)	462.36	Undertaking #20, Pg. 2, Col. 11, Ln. 7
1.2	Delivery Charge (1.2 x 12 x \$35.0933/10 ³ m ³)	505.34	Undertaking #20, Pg. 2, Col. 1, Ln. 8
	Injection Withdrawal Charge (200 10 ³ m ³ x \$2.6230/10 ³ m ³) ¹	524.6	Undertaking #22, Col. 1, Ln. 5
1.4	Subtotal @ 100 10 ³ m ³	<u>1,492.30</u>	
1.5	Unit rate per 10 ³ m ³	\$14.9230	Ln. 1.4/100
1.6	Unit Rate per GJ	\$0.3959	Ln. 1.5/37.69
	Scenario # 2- Unratcheted 1.2%	<u>(\$/ 100 10³m³)</u>	
2.1	Space Charge (\$0.3853/10 ³ m ³ x 12 x 100)	462.36	Undertaking #20, Pg. 2, Col. 11, Ln. 7
2.2	Delivery Charge (1.2 x 12 x \$35.9888/10 ³ m ³)	518.24	Undertaking #20, Pg. 2, Col. 2, Ln. 8
2.3	Injection Withdrawal Charge (200 10 ³ m ³ x \$2.6230/10 ³ m ³) ¹	524.6	Undertaking #22, Col. 1, Ln. 5
2.4	Subtotal @ 100 10 ³ m ³	<u>1,505.20</u>	
2.5	Unit rate per 10 ³ m ³	\$15.0520	Ln. 2.4/100
2.6	Unit Rate per GJ	\$0.3994	Ln. 2.5/37.69
	Scenario # 3- Ratcheted 5%	<u>(\$/ 100 10³m³)</u>	
3.1	Space Charge (\$0.3853/10 ³ m ³ x 12 x 100)	462.36	Undertaking #20, Pg. 2, Col. 11, Ln. 7
3.2	Delivery Charge (1.2 x 12 x \$35.0933/10 ³ m ³)	505.34	Undertaking #20, Pg. 2, Col. 1, Ln. 8
3.3	Incremental Delivery Charge for 5% (5.0-1.2 x 12 x \$60.4742/10 ³ m ³)	2,757.62	Undertaking #20, Pg. 2, Col. 3, Ln. 9
3.4	Injection Withdrawal Charge (200 10 ³ m ³ x \$2.6230/10 ³ m ³) ¹	524.6	Undertaking #22, Col. 1, Ln. 5
3.5	Subtotal @ 100 10 ³ m ³	<u>4,249.93</u>	
3.6	Unit rate per 10 ³ m ³	\$42.4993	Ln. 3.5/100
3.7	Unit Rate per GJ	\$1.1276	Ln. 3.6/37.69
	Scenario # 4- Unratcheted 5%	<u>(\$/ 100 10³m³)</u>	
4.1	Space Charge (\$0.3853/10 ³ m ³ x 12 x 100)	462.36	Undertaking #20, Pg. 2, Col. 11, Ln. 7
4.2	Delivery Charge (1.2 x 12 x \$35.9888/10 ³ m ³)	518.24	Undertaking #20, Pg. 2, Col. 2, Ln. 8
4.3	Incremental Delivery Charge for 5% (5.0-1.2 x 12 x \$84.9835/10 ³ m ³)	3,875.25	Undertaking #20, Pg. 2, Col. 5, Ln. 9
4.4	Injection Withdrawal Charge (200 10 ³ m ³ x \$2.6230/10 ³ m ³) ¹	524.6	Undertaking #22, Col. 1, Ln. 5
4.5	Subtotal @ 100 10 ³ m ³	<u>5,380.45</u>	
4.6	Unit rate per 10 ³ m ³	\$53.8045	Ln. 4.5/100
4.7	Unit Rate per GJ	\$1.4276	Ln. 4.6/37.69
	Scenario # 5- Ratcheted 10%	<u>(\$/ 100 10³m³)</u>	
5.1	Space Charge (\$0.3853/10 ³ m ³ x 12 x 100)	462.36	Undertaking #20, Pg. 2, Col. 11, Ln. 7
5.2	Delivery Charge (1.2 x 12 x \$35.0933/10 ³ m ³)	505.34	Undertaking #20, Pg. 2, Col. 1, Ln. 8
5.3	Incremental Delivery Charge for 10% (10.0-1.2 x 12 x \$42.2589/10 ³ m ³)	4,462.54	Undertaking #20, Pg. 2, Col. 7, Ln. 10
5.4	Injection Withdrawal Charge (200 10 ³ m ³ x \$2.6230/10 ³ m ³) ¹	524.6	Undertaking #22, Col. 1, Ln. 5
5.5	Subtotal @ 100 10 ³ m ³	<u>5,954.84</u>	
5.6	Unit rate per 10 ³ m ³	\$59.5484	Ln. 5.5/100
5.7	Unit Rate per GJ	\$1.5800	Ln. 5.6/37.69
	Scenario # 6- Unratcheted 10%	<u>(\$/ 100 10³m³)</u>	
6.1	Space Charge (\$0.3853/10 ³ m ³ x 12 x 100)	462.36	Undertaking #20, Pg. 2, Col. 11, Ln. 7
6.2	Delivery Charge (1.2 x 12 x \$35.9888/10 ³ m ³)	518.24	Undertaking #20, Pg. 2, Col. 2, Ln. 8
6.3	Incremental Delivery Charge for 10% (10.0-1.2 x 12 x \$75.0191/10 ³ m ³)	7,922.02	Undertaking #20, Pg. 2, Col. 9, Ln. 10
6.4	Injection Withdrawal Charge (200 10 ³ m ³ x \$2.6230/10 ³ m ³) ¹	524.6	Undertaking #22, Col. 1, Ln. 5
6.5	Subtotal @ 100 10 ³ m ³	<u>9,427.22</u>	
6.6	Unit rate per 10 ³ m ³	\$94.2722	Ln. 6.5/100
6.7	Unit Rate per GJ	\$2.5013	Ln. 6.6/37.69

Notes

1. 100 10³m³ for injection and 100 10³m³ for withdrawal

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #21

UNDERTAKING

TO FILE calculations showing the need for the maximum deliverability demand charge for Rate 316 to be 10 times the minimum amount. (Reference: Exhibit C, Tab 3, Schedule 1, page 8). (Tr. 53, April 27, 2006)

RESPONSE

The minimum charges on Rate 316 represent cost based rates for traditional storage service (1.2% deliverability and ratcheted) at Dawn. Page 2 shows that these rates translate to \$0.4/GJ (Line 1.6) per unit of space assuming single cycle storage. The Company understands that equivalent market based storage at Dawn may be obtained for roughly two times the cost based rate or \$0.8/GJ. Assuming that injection and withdrawal charges are identical under cost based and market based rates, this implies market demand charges for space and deliverability equal to approximately 2.5 (Line 2.0, page 2) times cost based rates. An alternative to developing high deliverability storage would be to contract for approximately eight times the required space at 1.2% to achieve the required deliverability units. At demand charges reflecting market based rates of \$0.8/GJ for 1.2% deliverability, this translates into \$6.7/GJ (Line 3.6, page 2) for equivalent high deliverability. The maximum at 5 times the minimum as in the company's Rate 330 would not allow a price in excess of \$6.3/GJ (Line 4.6, page 2). Therefore the range of prices must be increased for equivalent service.

In fact, the Company is offering unratcheted 10% deliverability storage service that is more valuable than the service costed above. Also, the analysis above that yields \$6.7/GJ understates cost because it does not reflect the cost of carrying inventory ten times over what is required by the customer. Therefore the Company believes that it is appropriate to increase the range of charges to ten times the minimum.

MAXIMUM DELIVERABILITY DEMAND CHARGE ANALYSIS

Filed: 2006-05-08
 EB-2005-0551
 Undertaking #21
 Page 2 of 2

Line No.		Col. 1	Col. 2	Col. 3	
	<u>Rate 316 minimum-1.2% Delivery</u>				
		Volume 10 ³ m ³	Rate \$/10 ³ m ³	\$	Reference
1.1	Space ¹	100	0.3853	462	Undertaking #22, Col.1, Ln.3.1
1.2	Deliverability ²	1.2	35.0933	505	Undertaking #22, Col.1, Ln.4.1
1.3	Injection/Withdrawals ³	200	2.623	<u>525</u>	Undertaking #22, Col.1, Ln.5
1.4	Total Annual Cost			1,492	
1.5	\$/10 ³ m ³ of space ⁴			14.92	
1.6	\$/GJ of space ⁵			0.40	

2 Market based factor 2.57 Undertaking #21

10% delivery by contracting for 8 times the space

		Volume 10 ³ m ³	Rate \$/10 ³ m ³	\$	
3.1	Space ¹	833	0.9902	9,902	Col.1, Ln.1.1 x Col.3, Ln.2
3.2	Deliverability ²	10	90.1898	10,823	Col.1, Ln.1.2 x Col.3, Ln.2
3.3	Injection/Withdrawals ³	1,667	2.623	<u>4,372</u>	Undertaking #22, Col.1, Ln.5
3.4	Total Annual Cost			25,097	
3.5	\$/10 ³ m ³ of space ⁴			250.97	
3.6	\$/GJ of space ⁵			6.66	

Rate 316 maximum at 10% deliverability

		Volume 10 ³ m ³	Rate \$/10 ³ m ³	\$	
4.1	Space ¹	100	1.9265	2,312	Col.1, Ln.1.1 x 5
4.2	Deliverability ²	10	175.4665	21,056	Col.1, Ln.1.2 x 5
4.3	Injection/Withdrawals ³	200	2.623	<u>525</u>	Undertaking #22, Col.1, Ln.5
4.4	Total Annual Cost			23,892	
4.5	\$/10 ³ m ³ of space ⁴			238.92	
4.6	\$/GJ of space ⁵			6.34	

Notes:

1. Col.1 x Col.2 x 12
2. Col.1 x Col.2 x 12
3. Col.1 x Col.2
4. Total Annual Cost / 100
5. \$/10³m³ of space / 37.69

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #22

UNDERTAKING

TO PROVIDE calculations to show the derivation of the storage space demand charge set out in the draft Rate 316 Schedule at Exhibit C, Tab 3, Schedule 3, page 1. (Tr. 55, April 27, 2006)

RESPONSE

The following table provides detailed calculations of the storage space demand charge set out in the draft Rate 316 Schedule.

DERIVATION OF STORAGE SPACE DEMAND CHARGES

Line No.		<u>Col. 1</u>	<u>Col. 2</u>	
		Annual Demand	Daily Demand	Reference
<u>Transmission and Compression</u>				
1.1	Cost of service (\$000)	6,079	9,119	Undertaking #20, Pg. 1, Ln. 3
1.2	Forecasted Gas Volumes (10 ³ M ³)	2,883,390	47,582	Undertaking #20, Pg. 1, Ln. 4
1.3	Unit Cost (\$/10 ³ m ³ /month)	0.1757	15.9705	(Cost x 1,000)/Volume/12
<u>Pool Storage</u>				
2.1	Cost of Service Analysis (\$000's)	6,846	10,268	Undertaking #20, Pg. 1, Ln. 3
2.2	Forecasted Gas Volumes (10 ³ m ³)	2,721,390	44,747	Undertaking #20, Pg. 1, Ln. 4
2.3	Unit Cost - Monthly (\$/10 ³ m ³ /month)	0.2096	19.1228	(Cost x 1,000)/Volume/12
<u>RATES (\$/10³m³)</u>				
Storage Space Demand Charge:				
3.1	Minimum ¹	0.3853		Col.1, Ln.1.3 + Col.1, Ln.2.3
3.2	Maximum ²	3.8530		Ln. 3.1 x 10
Tiered Storage Deliverability/ Injection Demand Charge:				
4.1	Minimum ³	35.0933		Col.2, Ln.1.3 + Col.2, Ln.2.3
4.2	Maximum ⁴	350.9330		Ln. 4.1 x 10
<u>Injection & Withdrawal Unit Charge</u>				
5.1	Rate 330 T&C Commodity Rate (\$/10 ³ m ³): ⁵	1.859		
5.2	Rate 330 Storage Commodity Rate (\$/10 ³ m ³): ⁵	0.7640		
5	Unit Charge (\$/10 ³ m ³)	<u>2.6230</u>		

Notes:

1. Col. 1, Ln 1.3 + Col. 1, Ln 2.3
2. Ln 3.1 x 10
3. Col. 2, Ln 1.3 + Col. 2, Ln 2.3
4. Ln 4.1 x 10
5. Same as Rate 330 Unit Charge as of April 1st, 2006 QRAM

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #23

UNDERTAKING

TO RECONSTRUCT the table found as Exhibit D, Tab 2, Schedule 1, Appendix B, showing the derivation of Rate 300 demand and customer charges with an allocation of extra high pressure main costs (as has been done for Rate 125). (Tr. 59, April 27, 2006)

RESPONSE

The table from Exhibit D, Tab 2, Schedule 1, Appendix B has been reworked to only reflect distribution costs associated with extra high pressure mains, plus distribution related bad debt expense and Demand Side Management costs. The reconstructed table is attached.

This exercise yields a contract demand charge of 11.11 cents/m³ of contract demand per month, assuming the monthly customer charge remains at \$500.

DERIVATION OF RATE 300 DEMAND AND CUSTOMER CHARGES BUT USING EXTRA HIGH PRESSURE MAIN (TP CAPACITY) COSTS ONLY

ALLOCATION OF RETURN & TAXES

ITEM No.	DESCRIPTION	Col. 1 RATE 100	Col. 2 RATE 110	Col. 3 RATE 115	Col. 4 TOTAL REFERENCE TOTAL (\$M)
DISTRIBUTION FACILITIES					
Capacity TP					
1.1	Total Distribution	3.62	0.78	0.89	Final Board Order / EB-2005-0001 / Ex. G2 / T5 / S2 / P1 / I4.1
		3.62	0.78	0.89	5.28
CUSTOMER RELATED					
1.2	Total Customer Related	2.34	0.54	0.16	3.04 Final Board Order / EB-2005-0001 / Ex. G2 / T5 / S2 / P1 / I5
1.3	Entrac	0.04	0.02	0.03	0.10 Final Board Order / EB-2005-0001 / Ex. G2 / T5 / S2 / P1 / I6
1	Sub-Total	6.00	1.34	1.07	8.42 Item 1.1 + Item 1.2 + Item 1.3

ALLOCATION OF COST OF SERVICE

DESCRIPTION	Col. 1 RATE 100	Col. 2 RATE 110	Col. 3 RATE 115	Col. 4 TOTAL TOTAL (\$M)	
DSM					
2.1.1	DSM - Peak	3.08	0.66	0.76	4.50 Final Board Order / EB-2005-0001 / Ex. G2 / T5 / S3 / P1 / I2.5
2.1.2	DSM - Annual	1.26	0.58	0.90	2.75 Final Board Order / EB-2005-0001 / Ex. G2 / T5 / S3 / P1 / I2.6 (excluding TS revenues)
2.1	Total DSM	4.34	1.25	1.66	7.25 Item 2.1.1 + Item 2.1.2
DISTRIBUTION FACILITIES					
2.2.1	Capacity TP	8.51	1.83	2.09	Final Board Order / EB-2005-0001 / Ex. G2 / T5 / S3 / P1 / I4.1
2.2.2	Bad Debt Distribution	0.17	0.00	0.00	Final Board Order / EB-2005-0001 / Ex. G2 / T5 / S3 / P1 / I4.5
2.2	Total Distribution	8.68	1.83	2.09	12.60 Item 2.2.1 + Item 2.2.2
CUSTOMER RELATED					
2.3	Total Customer Related	8.05	1.76	0.75	10.57 Final Board Order / EB-2005-0001 / Ex. G2 / T5 / S3 / P1 / I5
2	Sub-Total	21.08	4.84	4.50	30.42 Item 2.1 + Item 2.2 + Item 2.3
3	Total Customer Related	10.44	2.32	0.94	13.70 Item 1.2 + Item 2.3
4	Total Distribution Related	16.65	3.86	4.63	25.14 Item 1.1 + Item 1.3 + Item 2.1 + Item 2.2
5	Total Cost of Service	27.09	6.18	5.57	38.84 Item 1.0 + Item 2.0
6 Number of Contracts					
7 Contract Demand (CD) in 10 ³ m ³					
8 Total Annual Charges					
Col. 1	Col. 2	Col. 3	ANNUAL CHARGES (\$)		
2,360	\$500	\$14,160,000		Col. 3= Col. 1 x Col. 2 (Note: Does not reflect unbundled rate implementation costs)	
18,516	\$0.1111	\$24,679,812		Col. 3= Col. 1 x Col. 2	
		\$38,839,812		Item 8, Col. 3 (Annual Revenues) = Item 5, Col. 4 (Annual Costs)	

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #24

UNDERTAKING

TO ADVISE how many customers would qualify for service under Rate 125 if the volume threshold was reduced to 300,000 m³, 200,000 m³, or to no minimum volume (assuming that only appropriate customers would obtain the service). (Tr. 75, April 27, 2006)

RESPONSE

The Company uses standard rate design principles to determine appropriate rate classes. The major criteria for determination of rate classes are daily contracted volume as well as load characteristics such as load factor. These major criteria are highly correlated to the costs of providing service. The applicability criteria do not identify minimum pressure as a requirement for service. The current applicability criterion for Rate 125 requires a minimum contract demand of 600 000 m³.

Currently, one existing customer would qualify for service under Rate 125 at the existing threshold level of 600 000 m³. If the contract demand threshold was reduced to 300 000 m³ the Company's 8 largest customers could migrate to Rate 125. If the contract demand threshold was reduced to 200 000 m³ one additional customer may migrate to Rate 125. If there was no minimum contract demand, and since minimum pressure is not a requirement for service under Rate 125, the Company would assume that all customers that could benefit economically from using the rate would choose to do so. At the rate currently proposed for Rate 125, this would include, as a minimum, all of its firm large volume customers (approx. 2,422 customers). Regarding appropriateness of customers from the subset identified above, the Company cannot provide a reasonable estimate of the number of customers whose equipment's operation may benefit from increased delivery pressure given the number and diverse characteristics of its customers.

The contract demand threshold for Rate 125 was set at 600 000 m³ for a number of reasons.

Firstly, Rate 125 was intended to preempt bypass in an environment of growth of gas fired generation in Enbridge Gas Distribution's franchise area. To do so, the rate has to be competitive with self supply options for large power plants who may choose to locate in close proximity to natural gas transmission lines, all else being equal.

Secondly, in the design of Rate 125, the Company assumed that it will serve Rate 125 customers off extra high pressure (or transmission pressure) mains. This is a reasonable

assumption given operating characteristics of potential Rate 125 customers, minimum CD requirements and that very large customers are most economically served from transmission pressure systems. Accordingly, the rate is costed on the basis of transmission pressure assets and excludes the cost of lower pressure systems. Rate 125 has a proposed monthly demand charge of approximately 9 cents per m³ as opposed to the proposed monthly demand charge of 22 cents per m³ for Rate 300 and most bundled large volume rates.

Thirdly, given the large differential between the charges on Rate 125 and Rate 300, the threshold of 600 000 m³ also limits the ability of existing customers to shift costs to other rate payers. As noted above there is currently only one existing customer who would qualify for Rate 125. The migration of this customer to Rate 125 would result in distribution cost savings to the customer of approximately \$1M and an increase in costs to other customers by the same amount. A volume threshold of 300 000 m³ and the resulting migration of the 8 largest customers to Rate 125 would result in a further cost shift of \$5M to other customers. These increases are in addition to the cost shift of \$4M from the redesign of Rate 300.

Given the above, lowering the threshold of Rate 125 would result in one of two outcomes that undermine the objectives of creating Rate 125:

- 1) The currently proposed toll would not be sustainable if the threshold is reduced. Lower pressure systems constitute the vast majority of the Company's distribution system. Therefore, the Company would either have to build more transmission pressure mains, or Rate 125 would have to pick up more cost associated with the lower pressure system. In either case, the cost of serving customers on Rate 125 will trend closer to the system average, thus undermining the objective being robust against bypass.
- 2) If the level of the rate is maintained despite the reduction in the threshold, the total burden on other customers from the approval of rates being considered in the NGEIR proceeding would exceed \$10M.

The Company submits that it is important to balance all of the above factors in determining rate class applicability. For example, it is possible that a power plant with a contract demand of 300 000 m³ who would qualify for Rate 300 would have similar pressure requirements as a customer qualifying for Rate 125. Such a customer would not be denied its pressure requirements under Rate 300, or other bundled rates, subject to project economics, however, they would be paying more for distribution service than on Rate 125. If the threshold for Rate 125 were lowered to 300 000 cubic meters, the customer would have an annual distribution cost saving of approximately \$500,000. On the other hand, since the rate must then be offered to existing customers who also meet this criterion, a

cost shift equal to ten times the benefit to the power plant or \$5M is imposed on other rate classes.

Also, the load balancing provisions of Rates 125 and 300 are tailored to reflect the cost consequences of balancing different loads. While the cost of distribution service under Rate 125 is less, there are more restrictions on its load balancing service. The cost of balancing a smaller but equally unpredictable load is less than a large load because system diversity and load balancing assets can absorb the unpredictability to a better extent. Consequently the balancing provisions under Rate 300 have less restrictions and lower unit rates than Rate 125. These benefits cannot be provided to the Company's largest customers because to do so creates potential reliability and cost problems for all of the Company's other customers.

For all these reasons, the Company concluded that the proposed threshold represented the best possible combination of rates and services consistent with cost causality and operational principles.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #25

UNDERTAKING

TO ADVISE how often there would be operational considerations that would limit either injection or withdrawal under Rate 316, and to advise what would be the timing and form for “proper notice” to customers of these limits (Reference: Exhibit C, Tab 3, Schedule 1, para. 14 (f)). (Tr. 84, April 27, 2006)

RESPONSE

This issue will be addressed by updated evidence to be filed by Enbridge Gas Distribution.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #26

UNDERTAKING

At paragraph 26 of Exhibit C, Tab 1, Schedule A of its evidence, Enbridge Gas Distribution states that "... certain of the Company's proposed rate offerings in this proceeding will not actually be available and used until a later time, perhaps in 2008." With respect to this statement, provide the following information:

- (a) all of the facts on which Enbridge Gas Distribution relies to support the conclusion that certain of its offerings will not actually be available and used until 2008;
- (b) the particular gas-fired generators in Enbridge Gas Distribution's franchise area which Enbridge Gas Distribution envisages will use its offerings commencing in 2008;
- (c) particulars of the Company's proposed rate offerings in this proceeding which will not be available until 2008 and those that will likely be available before that date;
- (d) the earliest date on which all of Enbridge Gas Distribution's proposed rate offerings in these proceedings will actually be available.

(References: Exhibit C, Tab 1, Schedule. 1, paras. 31 to 48; Exhibit C, Tab 2, Schedule. 4 - Derivation of Rate 125 Charges; Exhibit C, Tab 3, Schedule 1 - Rate 316) (Tr. 88, April 27, 2006)

RESPONSE

- a) At Exhibit B, Tab 3, Schedule 2, Page 23, the Company has outlined a summary of key milestones for its storage build program. Based on these milestones, the Company concludes that the Rate 125 load balancing service and Rate 316 High Deliverability Storage service will not be available until 2008.
- b) At Exhibit B, Tab 2, Schedule 1, Page 2, Table 1 outlines the forecast of new gas fired generation in Enbridge Gas Distribution franchise's for years 2007 to 2014. For 2008, the Company has forecast load for Goreway, Downtown and York region totaling 1,400 MW.

c) and d) The Company has indicated that the effective date of its rates for Rate 125 distribution service, Rate 300 distribution service and load balancing provisions, and Rate 315 Storage Service can be no earlier than 2007. Implementing the rates in 2006 would not allow the Company the ability to reflect customer migration impacts in its 2006 rates nor would the Company have the time necessary to implement business process changes. As mentioned in response to part a), the Company is unable to provide load balancing provisions for Rate 125 and High Deliverability Storage for Rate 316 until 2008.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #27

UNDERTAKING

TO PROVIDE a table which will show the following information for Rates 125 and 316 separately:

- (a) a list of items of incremental capital and operating costs which Enbridge Gas Distribution says must be considered before the level of charges for each rate can be determined;
- (b) the allocation factor of Enbridge Gas Distribution proposes to apply to each of these separate items of incremental cost incurrence and the extend to which any of the incremental costs will be allocated to each rate class other than rate 125 and 316. (Tr. 89, April 27, 2006)

RESPONSE

(a) and (b)

The incremental capital and operating and maintenance ("O&M") costs needed to provide the proposed services include:

- the proposed capital build program at Tecumseh Storage and incremental annual O&M costs to support the proposed Rate 316 and load balancing provisions of Rate 125; and
- unbundled rates implementation costs (capital and O&M).

The following paragraphs detail the proposed incremental expenditures and discuss the recovery of such costs by the various rate classes.

Storage Costs

As discussed at Exhibit B, Tab 3, Schedule 2, the Company is proposing to build storage facilities that will offer incremental storage space of 2 Bcf and 10% deliverability of 200 mmcf/day on a firm ratcheted or un-ratcheted basis.

The tables below outline the level of expenditures required to provide 10% deliverability on an un-ratcheted basis.

Table 1: Capital Costs

Project Component	Capital Cost (\$ million)
Reservoir Delta Pressuring	0.6
Sombra Transmission Tie-In	2.3
Wilksport Looping	8.4
Vector Tie-In	1.2
Sombra Compression	5
Horizontal Well Drilling	8.7
Total	26.2

Reference: Exhibit B, Tab 3, Schedule 2,
 Page 20, Item 53

Table 2: Annual Incremental O&M Impact

Activity	O&M Cost (\$000)
Pipeline Integrity	25
Well Integrity	60
Land Payments	12
Compressor Maintenance	28
Vector Tie-In	10
Sombra Transmission Tie-In	15
Operations Staff Additions	130
Total	280

Reference: Exhibit B, Tab 3, Schedule 2,
 Page 22, Item 59

As shown at the table at Exhibit C, Tab 3, Schedule 1, Page 3 the Company isolated the costs of the storage build associated with 1.2% deliverability. These costs were allocated across the system and resulted in a slight decline in storage space and deliverability demand charges relative to the 2006 Decision with Reason. The remaining costs of the storage build were allocated on an incremental basis to Rate 316 and Rate 125.

In the Company's proposal none of the incremental storage costs are allocated to any other rate class other than Rate 316 and Rate 125.

Unbundled Rates Implementation Costs

The unbundled rates implementation costs are not specific to Rate 125 and/or Rate 316, but apply to all proposed unbundled Rates: 125, 300, 315 and 316.

As discussed at Exhibit B, Tab 3, Schedule 3, the Company retained Sapient Canada Inc. to prepare an impact assessment of the changes that may be required to implement the

proposed unbundled rates and any other NGEIR requirements.

At a high level, the assessment identified the following capital and O&M expenditures needed to facilitate implementation of the Company's NGEIR proposals. Modifications may also be required to systems supporting metering, nominations and customer relationship management. The incremental EnTRAC costs represent system-related and system support expenditures only, and exclude any costs associated with items such as user training, legal, or communication.

Table 3: Capital Costs

Project Component	Capital Cost Range (\$ million)
EnTRAC Modifications ⁽¹⁾	2.3 - 4.0
Billing System Modifications ⁽²⁾	0.3
Total	2.6 - 4.3

References:

⁽¹⁾ Exhibit B, Tab 3, Schedule 3, Page 2,
Item 5

⁽²⁾ Exhibit B, Tab 3, Schedule 3, Page4, Item
11

Table 4: Annual Incremental O&M Impact

Activity	O&M Cost
EnTRAC Support ⁽¹⁾	\$300,000 - \$500,000
Sub-Total	\$300,000 - \$500,000
Incremental Billing Costs ⁽²⁾	\$150 / bill

References:

⁽¹⁾ Exhibit B, Tab 3, Schedule 3, Page 2,
Item 5

⁽²⁾ Exhibit B, Tab 3, Schedule 3, Page 4,
Item 11

As discussed at Exhibit C, Tab 3, Schedule 4, Page 1 and at Undertaking Response #1, the benefits of unbundled rates implementation, including EnTRAC enhancements, flow primarily to the unbundled large volume customers. Nevertheless, EnTRAC enhancements also provide a benefit to bundled large volume customers by providing them with a choice of service options.

General service customers are unlikely to subscribe to the proposed unbundled services. Consequently, little or no benefits resulting from EnTRAC modifications would be realized by the general service customers.

In light of the above, the Company is proposing to allocate and recover the unbundled rates implementation/EnTRAC enhancement costs from both bundled and unbundled large volume customers based on customer numbers.

As stated at Exhibit C, Tab 2, Schedule 4, Page 1, Item 2, the unbundled rate implementation costs result in an annual revenue requirement of approx. \$1.6 million.

The proposed allocation percentages and dollar amounts are shown in the table below. Note that the allocation is to the large volume customers only. The proposed approach yields a customer charge of approx. \$50.00 per month which is also discussed at Exhibit C, Tab 2, Schedule 4, tem 2.

Table 5: Proposed Allocation % for Unbundled Rates Implementation Costs

	Rate 1	Rate 6	Rate 9	Rate 100	Rate 110	Rate 115	Rate 135	Rate 145	Rate 170	Rate 300	GAZIFERE	Total
# of Customers	1,642,513	147,356	37	1,330	14	0	34	198	52	1,077	1	1,792,613
Allocation % Large Vol Only	0.0%	0.0%	0.0%	49.1%	0.5%	0.0%	1.3%	7.3%	1.9%	39.8%	0.0%	100.0%
Allocation (\$000)	-	-	-	812.2	8.5	-	20.8	120.9	31.8	657.7	0.6	1,653.1

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #28

UNDERTAKING

TO INDICATE how Enbridge Gas Distribution proposes to allocate any revenue deficiency created by the migration of existing customers to proposed Rates 125 and 316 amongst all of its existing rate classes. (Tr. 89, April 27, 2006)

RESPONSE

Migration of Existing Customers to Rate 125

As outlined at Exhibit C, Tab 1, Schedule 1, Page 13, Section(c), the Company is:

- a) requesting a variance account to record the revenue consequences of actual customer migration to the proposed Rate 300 and Rate 125 being different from the revenue consequences of the forecast customer migration; and
- b) proposing to design its bundled rates (100, 110 and 115) in its 2007 Rates proceeding on the assumption that all bundled customers who would find it economically advantageous to take service under the proposed unbundled distribution Rates (300 and 125) would do so.

If actual customer migration is less than the forecast, the Company would credit bundled Rate 100, 110 and 115 customers for any over recovery from the increase in bundled rates. In such a case, the Company would allocate credits to Rate 100, 110 and 115 customers in the same manner in which the bundled rate increases were determined.

Should the forecast assume a certain customer would migrate to Rate 300, but the customer migrated to Rate 125 instead, the proposed variance account would capture the additional shortfall in revenue recovery. Such a situation could occur if the customer's load increased, qualifying the customer for Rate 125 service, after the Company submitted its 2007 Rate Case application.

In either case, the proposed variance account would protect the existing rate classes and the Company from the impact of variances in customer take up of the proposed services.

Migration of Existing Customers to Rate 316

The Company does not foresee revenue recovery issues arising from migration of existing customers to Rate 316.

All in-franchise customers are entitled to a certain amount of cost-based storage space, which is allocated to customers based on an algorithm that takes into account each customer's seasonal load profile and standard deliverability of 1.2% of allocated storage space and subject to ratchets.

As discussed at Exhibit C, Tab 3, Schedule 1, the Company is proposing to maintain these principles under Rate 316, where the demand charge for the standard 1.2% deliverability is derived on a fully allocated basis, while the demand charges for high deliverability storage are determined on an incremental basis.

It is important to note that the incremental costs of Rate 316 high deliverability storage, over and beyond the standard 1.2% deliverability, will be recovered entirely from customers contracting for high deliverability service.

As the standard 1.2% deliverability is derived at cost for the existing bundled rates as well as the proposed unbundled storage rates, migration of existing customers to Rate 316 would not result in revenue recovery issues for the Company or impacts for the existing rate classes.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #29

UNDERTAKING

TO SHOW the allocation factors being applied to each of those items of incremental cost and, in particular, the amount thereof which will be allocated to each of the rate classes other than the Rate 300 Series if the allocation factors Enbridge Gas Distribution proposes are utilized. (Tr. 90, April 27, 2006)

RESPONSE

Enbridge Gas Distribution will incur unbundled rates implementation costs to provide unbundled Rates: 125, 300, 315, and 316 to its customers.

Please see the response to Undertaking #27 regarding the Company proposal for allocation of such costs.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #30

UNDERTAKING

In Exhibit C, Tab 1, Schedule 1 at page 13 at paragraph 51, the Company states that “the redesign of the Company’s unbundled rates is estimated to provide benefits in the form of lower distribution rates to approximately 1100 customers, worth approximately \$4 M collectively.” With respect to this statement, provide the following information:

- (a) a detailed description with supporting calculations of the manner in which the Company has determined that approximately 1100 customers will be better off if they migrate from existing rates to the Company’s proposed unbundled rates. The answer should indicate which rate classes the migrating customers came from. (Tr. 90, April 27, 2006)

RESPONSE

The table below shows the number of customers migrating from Rate 100, 110, and 115 to the proposed unbundled distribution Rates (125 and 300) and the associated margin impacts. The attached list provides supporting calculations for each of the 1,077 customers.

	Number of customers qualified for Rate 300	Number of customer qualified for Rate 125	Margin Impact
Rate 100	754		\$ 2,560,992
Rate 110	275		\$ 591,342
Rate 115	47		\$ 536,375
Rate 115		1	\$ 1,075,458
Total	1076	1	\$ 4,764,167

A customer is assumed to migrate if total distribution costs under the unbundled service is less than under the bundled service. Currently, one Rate 115 customer qualifies for Rate 125. In its analysis, the Company assumed that this customer would migrate to Rate 125 and that the rest of the customers, who benefit from an unbundled distribution rate, would migrate to Rate 300.

The bundled annual distribution revenue for each customer is the sum of customer and delivery charges and is based on the rates approved in the Final Board Order EB-2005-0001.

To facilitate comparison with unbundled rates the bundled distribution revenue from above was adjusted to include DSM costs and to exclude storage costs and distribution commodity/unaccounted for gas ("UFG") costs. The adjustment is needed because bundled distribution rates include storage costs and the UFG. Rate 125 and Rate 300 do not include storage costs and their customers provide UFG in-kind. With respect to Demand Side Management ("DSM") costs, the Company currently recovers DSM costs through its gas supply load balancing charges which are payable by all bundled customers. Should bundled customers migrate to Rate 125 or Rate 300 service they would no longer pay gas supply load balancing charges. Consequently, the Company would lose its ability to recover DSM costs through such a mechanism. Therefore, the Company is proposing to recover its DSM costs through distribution charges starting in 2007.

The annual distribution revenue for Rates 125 and 300 is the sum of customer charge and demand charge.

The derivation of Rate 125 customer and demand charges is shown at Exhibit C, Tab 2, Schedule 4, Pages 1 and 2.

The derivation of Rate 300 customer and demand charges is shown at Exhibit D, Tab 2, Schedule 1, Page 1, Appendix B.

Rate Class	Contract Demand	Annual Volume m3	Adjustments including DSM, less Storage and		Adjusted Bundled Distribution Revenue (\$)	Rate 300 Distribution Revenue (\$)	Rate 125 Distribution Revenue (\$)	Bundled Rate vs Bundled Rate vs	
			Bundled Distribution Revenue (\$)	Distribution Commodity				Rate 300	Rate 125
115	610,000	205,911,600	\$ 1,829,785	\$ (74,733)	\$ 1,755,052	NA	679,594	NA	\$ 1,075,458
115	300,000	109,367,120	\$ 922,721	\$ (39,693)	\$ 883,028	\$ 821,619		\$	61,409
100	110,000	15,775,379	\$ 516,429	\$ (160,073)	\$ 356,356	\$ 305,060		\$	51,296
115	380,000	119,781,997	\$ 1,132,312	\$ (43,473)	\$ 1,088,839	\$ 1,039,117		\$	49,721
100	39,000	6,607,089	\$ 219,954	\$ (67,042)	\$ 152,912	\$ 112,030		\$	40,881
100	30,200	5,496,000	\$ 184,025	\$ (55,768)	\$ 128,257	\$ 88,106		\$	40,151
100	120,000	16,406,196	\$ 536,828	\$ (166,473)	\$ 370,354	\$ 332,248		\$	38,107
115	310,000	92,177,400	\$ 917,688	\$ (33,454)	\$ 884,233	\$ 848,806		\$	35,427
115	334,000	97,643,669	\$ 984,520	\$ (35,438)	\$ 949,082	\$ 914,056		\$	35,026
115	142,000	45,878,510	\$ 436,289	\$ (16,651)	\$ 419,638	\$ 392,060		\$	27,578
100	18,000	3,411,669	\$ 116,624	\$ (34,618)	\$ 82,005	\$ 54,937		\$	27,068
115	82,000	29,387,246	\$ 264,435	\$ (10,666)	\$ 253,769	\$ 228,936		\$	24,834
100	18,000	3,309,391	\$ 113,316	\$ (33,580)	\$ 79,736	\$ 54,937		\$	24,799
100	30,000	4,730,400	\$ 159,267	\$ (47,999)	\$ 111,268	\$ 87,562		\$	23,706
115	123,000	37,445,929	\$ 376,446	\$ (13,590)	\$ 362,856	\$ 340,404		\$	22,452
100	20,000	3,452,093	\$ 117,587	\$ (35,028)	\$ 82,559	\$ 60,375		\$	22,184
115	143,000	41,800,000	\$ 431,800	\$ (15,171)	\$ 416,629	\$ 394,778		\$	21,851
115	62,500	22,085,309	\$ 205,302	\$ (8,016)	\$ 197,287	\$ 175,921		\$	21,366
115	95,500	29,995,849	\$ 297,863	\$ (10,887)	\$ 286,976	\$ 265,639		\$	21,338
115	120,000	35,503,516	\$ 365,965	\$ (12,885)	\$ 353,080	\$ 332,248		\$	20,832
100	16,500	2,859,923	\$ 98,782	\$ (29,020)	\$ 69,762	\$ 50,859		\$	18,903
100	12,450	2,350,837	\$ 82,319	\$ (23,854)	\$ 58,466	\$ 39,848		\$	18,617
115	40,000	14,182,606	\$ 137,954	\$ (5,147)	\$ 132,807	\$ 114,749		\$	18,058
100	13,120	2,393,588	\$ 83,702	\$ (24,288)	\$ 59,414	\$ 41,670		\$	17,744
115	79,200	23,136,939	\$ 247,158	\$ (8,397)	\$ 238,761	\$ 221,323		\$	17,438
100	12,000	2,252,795	\$ 78,861	\$ (22,859)	\$ 56,002	\$ 38,625		\$	17,377
100	35,000	4,996,273	\$ 167,865	\$ (50,697)	\$ 117,168	\$ 101,156		\$	16,012
115	46,500	14,566,000	\$ 153,488	\$ (5,287)	\$ 148,201	\$ 132,421		\$	15,781
110	37,000	10,753,661	\$ 148,107	\$ (26,269)	\$ 121,838	\$ 106,593		\$	15,245
110	44,200	12,876,881	\$ 171,945	\$ (31,456)	\$ 140,489	\$ 126,168		\$	14,321
100	10,500	1,902,835	\$ 67,832	\$ (19,308)	\$ 48,524	\$ 34,547		\$	13,978
100	13,000	2,207,401	\$ 77,680	\$ (22,398)	\$ 55,282	\$ 41,343		\$	13,938
100	8,500	1,655,034	\$ 59,819	\$ (16,794)	\$ 43,026	\$ 29,109		\$	13,917
100	10,100	1,843,000	\$ 65,898	\$ (18,701)	\$ 47,197	\$ 33,459		\$	13,738
100	7,700	1,545,247	\$ 56,269	\$ (15,680)	\$ 40,590	\$ 26,934		\$	13,655
100	9,950	1,812,000	\$ 64,895	\$ (18,386)	\$ 46,509	\$ 33,051		\$	13,457
100	9,787	1,788,549	\$ 64,137	\$ (18,148)	\$ 45,988	\$ 32,608		\$	13,380
100	10,000	1,874,963	\$ 65,427	\$ (19,025)	\$ 46,402	\$ 33,187		\$	13,214
100	55,000	7,353,075	\$ 243,227	\$ (74,612)	\$ 168,615	\$ 155,530		\$	13,085
100	10,315	1,836,645	\$ 65,542	\$ (18,636)	\$ 46,906	\$ 34,044		\$	12,862
110	33,700	9,834,350	\$ 134,094	\$ (24,024)	\$ 110,070	\$ 97,621		\$	12,449
100	13,575	2,206,839	\$ 77,663	\$ (22,393)	\$ 55,270	\$ 42,907		\$	12,364
100	10,600	1,931,600	\$ 66,662	\$ (19,600)	\$ 47,063	\$ 34,819		\$	12,244
100	6,325	1,312,904	\$ 48,756	\$ (13,322)	\$ 35,434	\$ 23,196		\$	12,238
100	18,000	2,743,068	\$ 95,003	\$ (27,834)	\$ 67,169	\$ 54,937		\$	12,232
110	62,500	14,359,336	\$ 223,160	\$ (35,078)	\$ 188,082	\$ 175,921		\$	12,162
100	16,212	2,517,665	\$ 87,714	\$ (25,547)	\$ 62,168	\$ 50,076		\$	12,091
110	32,000	8,820,994	\$ 126,614	\$ (21,548)	\$ 105,066	\$ 92,999		\$	12,066
110	65,000	14,565,838	\$ 229,976	\$ (35,582)	\$ 194,394	\$ 182,717		\$	11,677
100	42,500	5,713,215	\$ 191,049	\$ (57,972)	\$ 133,077	\$ 121,546		\$	11,531
100	8,280	1,509,887	\$ 55,126	\$ (15,321)	\$ 39,805	\$ 28,511		\$	11,294
115	21,500	7,765,807	\$ 78,482	\$ (2,818)	\$ 75,664	\$ 64,453		\$	11,211
110	27,000	7,847,015	\$ 109,755	\$ (19,169)	\$ 90,586	\$ 79,406		\$	11,180
100	8,770	1,599,683	\$ 57,163	\$ (16,232)	\$ 40,931	\$ 29,843		\$	11,088
100	6,900	1,329,540	\$ 49,290	\$ (13,491)	\$ 35,799	\$ 24,759		\$	11,039
100	8,030	1,465,000	\$ 53,674	\$ (14,865)	\$ 38,809	\$ 27,831		\$	10,977
100	10,000	1,706,319	\$ 61,478	\$ (17,314)	\$ 44,164	\$ 33,187		\$	10,976
100	8,010	1,457,984	\$ 53,447	\$ (14,794)	\$ 38,653	\$ 27,777		\$	10,876
100	28,500	3,965,259	\$ 134,525	\$ (40,235)	\$ 94,290	\$ 83,484		\$	10,806
100	10,000	1,715,621	\$ 61,395	\$ (17,408)	\$ 43,986	\$ 33,187		\$	10,799
100	8,000	1,451,103	\$ 53,225	\$ (14,724)	\$ 38,500	\$ 27,750		\$	10,751
100	9,000	1,571,829	\$ 57,129	\$ (15,949)	\$ 41,179	\$ 30,469		\$	10,711
100	14,000	2,229,730	\$ 77,357	\$ (22,625)	\$ 54,732	\$ 44,062		\$	10,670
100	7,250	1,354,682	\$ 50,083	\$ (13,746)	\$ 36,337	\$ 25,711		\$	10,626
100	30,000	4,126,861	\$ 139,751	\$ (41,875)	\$ 97,876	\$ 87,562		\$	10,314
100	10,309	1,712,803	\$ 61,687	\$ (17,380)	\$ 44,308	\$ 34,027		\$	10,280
100	8,500	1,487,481	\$ 54,401	\$ (15,093)	\$ 39,308	\$ 29,109		\$	10,199
100	9,100	1,556,387	\$ 56,629	\$ (15,793)	\$ 40,837	\$ 30,740		\$	10,096
115	19,000	6,937,566	\$ 70,255	\$ (2,518)	\$ 67,737	\$ 57,656		\$	10,081
115	22,000	7,314,270	\$ 78,468	\$ (2,655)	\$ 75,813	\$ 65,812		\$	10,001
115	25,000	7,718,136	\$ 86,754	\$ (2,801)	\$ 83,953	\$ 73,968		\$	9,985
110	50,000	10,781,402	\$ 178,127	\$ (26,337)	\$ 151,790	\$ 141,936		\$	9,854
100	7,350	1,336,563	\$ 49,298	\$ (13,562)	\$ 35,736	\$ 25,983		\$	9,753
100	5,000	1,038,229	\$ 39,813	\$ (10,535)	\$ 29,278	\$ 19,594		\$	9,685
110	23,000	6,692,832	\$ 94,443	\$ (16,349)	\$ 78,094	\$ 68,531		\$	9,563
100	7,000	1,275,000	\$ 47,530	\$ (12,937)	\$ 34,593	\$ 25,031		\$	9,562
100	7,130	1,300,139	\$ 48,082	\$ (13,192)	\$ 34,890	\$ 25,385		\$	9,505
110	32,000	7,776,886	\$ 121,428	\$ (18,998)	\$ 102,430	\$ 92,999		\$	9,431
100	8,000	1,398,436	\$ 51,310	\$ (14,190)	\$ 37,120	\$ 27,750		\$	9,370
100	11,500	1,817,016	\$ 65,007	\$ (18,437)	\$ 46,569	\$ 37,265		\$	9,304
100	7,660	1,398,000	\$ 50,180	\$ (14,185)	\$ 35,994	\$ 26,825		\$	9,169
115	25,200	7,365,496	\$ 86,286	\$ (2,673)	\$ 83,613	\$ 74,512		\$	9,101
115	25,000	7,305,016	\$ 85,643	\$ (2,651)	\$ 82,992	\$ 73,968		\$	9,024
100	7,640	1,394,615	\$ 49,931	\$ (14,151)	\$ 35,780	\$ 26,771		\$	9,009
100	6,575	1,195,284	\$ 44,952	\$ (12,129)	\$ 32,824	\$ 23,876		\$	8,948
100	11,327	1,774,629	\$ 63,687	\$ (18,007)	\$ 45,680	\$ 36,795		\$	8,884
110	28,000	7,051,208	\$ 108,223	\$ (17,225)	\$ 90,998	\$ 82,124		\$	8,874
100	12,000	1,854,678	\$ 66,275	\$ (18,819)	\$ 47,456	\$ 38,625		\$	8,831
100	15,500	2,283,137	\$ 80,130	\$ (23,167)	\$ 56,963	\$ 48,140		\$	8,823
100	11,000	1,724,876	\$ 62,078	\$ (17,502)	\$ 44,575	\$ 35,906		\$	8,669
100	5,000	987,364	\$ 38,229	\$ (10,019)	\$ 28,210	\$ 19,594		\$	8,616
100	4,200	886,930	\$ 34,981	\$ (9,000)	\$ 25,981	\$ 17,419		\$	8,563
100	6,000	1,105,312	\$ 42,043	\$ (11,216)	\$ 30,827	\$ 22,312		\$	8,515
100	5,300	1,020,426	\$ 39,246	\$ (10,354)	\$ 28,891	\$ 20,409		\$	8,482

Rate Class	Contract Demand	Annual Volume m3	Adjustments including DSM, less Storage and Distribution			Adjusted Bundled Distribution Revenue (\$)	Rate 300 Distribution Revenue (\$)	Rate 125 Distribution Revenue (\$)	Bundled Rate vs Rate 300	Bundled Rate vs Rate 125
			Bundled Distribution Revenue (\$)	Commodity	Distribution					
100	6,350	1,154,000	\$ 43,444	\$ (11,710)	\$ 31,734	\$ 23,264	\$ 8,471			
100	6,200	1,130,000	\$ 42,685	\$ (11,466)	\$ 31,219	\$ 22,856	\$ 8,363			
110	19,600	5,722,000	\$ 81,461	\$ (13,978)	\$ 67,483	\$ 59,287	\$ 8,196			
100	12,900	1,933,476	\$ 68,823	\$ (19,619)	\$ 49,204	\$ 41,072	\$ 8,133			
100	7,300	1,245,804	\$ 46,583	\$ (12,641)	\$ 33,941	\$ 25,847	\$ 8,095			
110	21,000	5,856,610	\$ 85,490	\$ (14,307)	\$ 71,183	\$ 63,093	\$ 8,090			
100	9,260	1,484,501	\$ 54,305	\$ (15,063)	\$ 39,242	\$ 31,175	\$ 8,066			
115	18,500	6,000,000	\$ 66,534	\$ (2,178)	\$ 64,356	\$ 56,297	\$ 8,060			
100	4,500	919,054	\$ 35,607	\$ (9,326)	\$ 26,281	\$ 18,234	\$ 8,047			
100	13,600	2,015,273	\$ 71,468	\$ (20,449)	\$ 51,019	\$ 42,975	\$ 8,045			
110	20,000	5,706,958	\$ 82,346	\$ (13,941)	\$ 68,405	\$ 60,375	\$ 8,031			
100	6,000	1,083,464	\$ 41,336	\$ (10,994)	\$ 30,343	\$ 22,312	\$ 8,030			
100	6,030	1,100,000	\$ 41,562	\$ (11,162)	\$ 30,400	\$ 22,394	\$ 8,006			
100	7,000	1,205,425	\$ 45,245	\$ (12,231)	\$ 33,014	\$ 25,031	\$ 7,983			
100	5,600	1,030,146	\$ 39,612	\$ (10,453)	\$ 29,159	\$ 21,225	\$ 7,935			
100	18,100	2,557,312	\$ 88,996	\$ (25,949)	\$ 63,047	\$ 55,209	\$ 7,838			
100	7,000	1,194,875	\$ 44,939	\$ (12,124)	\$ 32,815	\$ 25,031	\$ 7,784			
100	7,000	1,192,242	\$ 44,854	\$ (12,098)	\$ 32,756	\$ 25,031	\$ 7,725			
100	4,000	828,020	\$ 32,984	\$ (8,402)	\$ 24,582	\$ 16,875	\$ 7,707			
100	9,700	1,520,835	\$ 55,480	\$ (15,432)	\$ 40,048	\$ 32,372	\$ 7,676			
100	23,800	3,245,700	\$ 111,257	\$ (32,934)	\$ 78,323	\$ 70,706	\$ 7,617			
100	5,930	1,075,206	\$ 40,625	\$ (10,910)	\$ 29,715	\$ 22,122	\$ 7,593			
100	5,000	940,717	\$ 36,720	\$ (9,545)	\$ 27,175	\$ 19,594	\$ 7,581			
100	5,800	1,049,908	\$ 39,986	\$ (10,653)	\$ 29,333	\$ 21,769	\$ 7,564			
115	18,500	5,714,005	\$ 65,765	\$ (2,074)	\$ 63,691	\$ 56,297	\$ 7,395			
115	20,500	5,988,000	\$ 71,302	\$ (2,173)	\$ 69,128	\$ 61,734	\$ 7,395			
100	5,400	980,000	\$ 37,991	\$ (9,944)	\$ 28,047	\$ 20,681	\$ 7,366			
100	5,350	971,700	\$ 37,722	\$ (9,860)	\$ 27,863	\$ 20,545	\$ 7,317			
100	12,300	1,822,948	\$ 65,249	\$ (18,497)	\$ 46,752	\$ 39,440	\$ 7,311			
110	22,000	5,672,936	\$ 86,977	\$ (13,858)	\$ 73,119	\$ 65,812	\$ 7,307			
100	5,000	941,692	\$ 36,450	\$ (9,555)	\$ 26,894	\$ 19,594	\$ 7,301			
100	6,300	1,086,408	\$ 41,432	\$ (11,024)	\$ 30,408	\$ 23,128	\$ 7,280			
100	5,400	975,000	\$ 37,829	\$ (9,893)	\$ 27,936	\$ 20,681	\$ 7,255			
100	12,500	1,841,058	\$ 65,835	\$ (18,681)	\$ 47,154	\$ 39,984	\$ 7,169			
100	7,500	1,228,183	\$ 46,016	\$ (12,462)	\$ 33,554	\$ 26,390	\$ 7,163			
100	5,250	953,000	\$ 37,079	\$ (9,670)	\$ 27,408	\$ 20,273	\$ 7,135			
110	19,700	5,284,862	\$ 79,530	\$ (12,910)	\$ 66,620	\$ 59,559	\$ 7,061			
100	7,200	1,183,665	\$ 44,577	\$ (12,011)	\$ 32,566	\$ 25,575	\$ 6,991			
100	5,270	960,727	\$ 36,996	\$ (9,748)	\$ 27,247	\$ 20,328	\$ 6,919			
110	26,000	6,013,970	\$ 98,271	\$ (14,691)	\$ 83,580	\$ 76,687	\$ 6,893			
100	6,020	1,086,936	\$ 40,266	\$ (11,029)	\$ 29,237	\$ 22,367	\$ 6,870			
100	7,500	1,213,179	\$ 45,531	\$ (12,310)	\$ 33,221	\$ 26,390	\$ 6,830			
100	7,000	1,169,868	\$ 43,695	\$ (11,871)	\$ 31,824	\$ 25,031	\$ 6,793			
100	9,900	1,499,895	\$ 54,803	\$ (15,219)	\$ 39,583	\$ 32,915	\$ 6,668			
100	7,000	1,144,424	\$ 43,308	\$ (11,612)	\$ 31,695	\$ 25,031	\$ 6,664			
100	7,000	1,141,780	\$ 43,221	\$ (11,586)	\$ 31,636	\$ 25,031	\$ 6,605			
100	5,050	921,000	\$ 35,671	\$ (9,345)	\$ 26,325	\$ 19,730	\$ 6,596			
100	5,100	917,238	\$ 35,749	\$ (9,307)	\$ 26,442	\$ 19,866	\$ 6,577			
100	7,700	1,226,073	\$ 45,948	\$ (12,441)	\$ 33,507	\$ 26,934	\$ 6,573			
100	4,850	880,000	\$ 34,662	\$ (8,929)	\$ 25,733	\$ 19,186	\$ 6,547			
100	5,150	938,380	\$ 36,060	\$ (9,522)	\$ 26,538	\$ 20,001	\$ 6,537			
100	4,200	801,524	\$ 32,080	\$ (8,133)	\$ 23,947	\$ 17,419	\$ 6,528			
100	10,500	1,566,930	\$ 56,964	\$ (15,900)	\$ 41,064	\$ 34,547	\$ 6,517			
100	3,500	717,516	\$ 29,265	\$ (7,281)	\$ 21,985	\$ 15,516	\$ 6,469			
100	17,100	2,372,703	\$ 83,027	\$ (24,076)	\$ 58,951	\$ 52,490	\$ 6,461			
100	4,600	853,306	\$ 33,604	\$ (8,658)	\$ 24,946	\$ 18,506	\$ 6,440			
100	4,000	766,706	\$ 31,061	\$ (7,780)	\$ 23,281	\$ 16,875	\$ 6,406			
100	4,000	773,849	\$ 31,051	\$ (7,852)	\$ 23,199	\$ 16,875	\$ 6,324			
100	4,500	820,214	\$ 32,824	\$ (8,323)	\$ 24,501	\$ 18,234	\$ 6,267			
100	3,100	654,789	\$ 27,330	\$ (6,644)	\$ 20,686	\$ 14,428	\$ 6,258			
100	3,500	733,870	\$ 29,219	\$ (7,447)	\$ 21,772	\$ 15,516	\$ 6,257			
110	40,000	7,523,415	\$ 139,369	\$ (18,378)	\$ 120,990	\$ 114,749	\$ 6,241			
100	5,350	919,468	\$ 36,033	\$ (9,330)	\$ 26,703	\$ 20,545	\$ 6,158			
100	5,200	901,000	\$ 35,436	\$ (9,142)	\$ 26,294	\$ 20,137	\$ 6,156			
100	6,000	997,470	\$ 38,556	\$ (10,121)	\$ 28,434	\$ 22,312	\$ 6,122			
100	4,500	813,422	\$ 32,604	\$ (8,254)	\$ 24,350	\$ 18,234	\$ 6,116			
100	4,450	806,000	\$ 32,364	\$ (8,178)	\$ 24,186	\$ 18,098	\$ 6,087			
100	7,300	1,174,908	\$ 43,853	\$ (11,922)	\$ 31,931	\$ 25,847	\$ 6,084			
100	4,000	763,397	\$ 30,702	\$ (7,746)	\$ 22,956	\$ 16,875	\$ 6,081			
110	38,000	7,159,277	\$ 132,760	\$ (17,489)	\$ 115,271	\$ 109,312	\$ 5,959			
110	31,000	6,275,241	\$ 111,569	\$ (15,329)	\$ 96,240	\$ 90,281	\$ 5,959			
100	6,000	988,152	\$ 38,254	\$ (10,027)	\$ 28,228	\$ 22,312	\$ 5,915			
100	6,000	987,730	\$ 38,241	\$ (10,022)	\$ 28,218	\$ 22,312	\$ 5,906			
100	4,350	791,000	\$ 31,756	\$ (8,026)	\$ 23,730	\$ 17,826	\$ 5,903			
100	4,400	795,000	\$ 31,930	\$ (8,067)	\$ 23,863	\$ 17,962	\$ 5,901			
115	15,000	4,580,057	\$ 54,316	\$ (1,662)	\$ 52,654	\$ 46,781	\$ 5,873			
100	4,200	766,708	\$ 31,066	\$ (7,780)	\$ 23,286	\$ 17,419	\$ 5,868			
100	4,250	770,147	\$ 31,177	\$ (7,815)	\$ 23,363	\$ 17,555	\$ 5,808			
100	4,400	800,000	\$ 31,885	\$ (8,118)	\$ 23,767	\$ 17,962	\$ 5,805			
100	4,400	795,000	\$ 31,762	\$ (8,067)	\$ 23,696	\$ 17,962	\$ 5,733			
100	5,200	931,000	\$ 35,311	\$ (9,447)	\$ 25,864	\$ 20,137	\$ 5,727			
100	9,000	1,346,950	\$ 49,857	\$ (13,667)	\$ 36,189	\$ 30,469	\$ 5,721			
100	4,150	753,186	\$ 30,629	\$ (7,643)	\$ 22,986	\$ 17,283	\$ 5,704			
100	4,500	814,210	\$ 32,187	\$ (8,262)	\$ 23,926	\$ 18,234	\$ 5,691			
115	15,700	4,592,562	\$ 56,029	\$ (1,667)	\$ 54,363	\$ 48,684	\$ 5,679			
100	3,800	711,900	\$ 29,179	\$ (7,224)	\$ 21,956	\$ 16,331	\$ 5,624			
100	3,100	345,000	\$ 12,731	\$ (3,501)	\$ 9,231	\$ 3,607	\$ 5,624			
115	11,000	3,922,607	\$ 42,948	\$ (1,424)	\$ 41,524	\$ 35,906	\$ 5,618			
100	4,400	791,766	\$ 31,610	\$ (8,034)	\$ 23,576	\$ 17,962	\$ 5,613			
100	7,800	1,195,819	\$ 44,925	\$ (12,134)	\$ 32,791	\$ 27,206	\$ 5,585			
100	4,400	802,213	\$ 31,677	\$ (8,140)	\$ 23,537	\$ 17,962	\$ 5,575			
110	15,500	4,159,100	\$ 63,858	\$ (10,160)	\$ 53,698	\$ 48,140	\$ 5,558			
100	4,000	733,706	\$ 29,868	\$ (7,445)	\$ 22,423	\$ 16,875	\$ 5,548			
100	8,100	1,236,852	\$ 46,057	\$ (12,550)	\$ 33,507	\$ 28,022	\$ 5,485			

Rate Class	Contract Demand	Annual Volume m3	Adjustments including DSM, less Storage and Distribution			Adjusted Bundled Distribution Revenue (\$)	Rate 300 Distribution Revenue (\$)	Rate 125 Distribution Revenue (\$)	Bundled Rate vs Rate 300	Bundled Rate vs Rate 125
			Bundled Distribution Revenue (\$)	Commodity	Distribution					
100	12,000	1,703,377	\$ 61,383	\$ (17,284)	\$ 44,098	\$ 38,625	\$	\$ 5,474		
100	4,300	783,000	\$ 31,061	\$ (7,945)	\$ 23,116	\$ 17,691	\$	\$ 5,426		
100	5,000	843,196	\$ 33,470	\$ (8,556)	\$ 24,914	\$ 19,594	\$	\$ 5,321		
110	13,050	3,750,000	\$ 55,946	\$ (9,161)	\$ 46,786	\$ 41,479	\$	\$ 5,306		
100	3,500	660,129	\$ 27,436	\$ (6,698)	\$ 20,737	\$ 15,516	\$	\$ 5,222		
100	4,450	811,000	\$ 31,519	\$ (8,229)	\$ 23,290	\$ 18,098	\$	\$ 5,192		
100	4,150	750,441	\$ 30,074	\$ (7,615)	\$ 22,460	\$ 17,283	\$	\$ 5,177		
100	4,200	763,292	\$ 30,289	\$ (7,745)	\$ 22,544	\$ 17,419	\$	\$ 5,126		
100	3,850	690,815	\$ 28,597	\$ (7,010)	\$ 21,588	\$ 16,467	\$	\$ 5,120		
100	3,100	630,385	\$ 25,892	\$ (6,397)	\$ 19,496	\$ 14,428	\$	\$ 5,068		
100	2,900	594,267	\$ 24,951	\$ (6,030)	\$ 18,921	\$ 13,884	\$	\$ 5,036		
110	13,200	3,646,658	\$ 55,793	\$ (8,908)	\$ 46,885	\$ 41,887	\$	\$ 4,998		
100	4,800	836,322	\$ 32,524	\$ (8,486)	\$ 24,038	\$ 19,050	\$	\$ 4,988		
100	6,500	1,030,320	\$ 39,104	\$ (10,455)	\$ 28,649	\$ 23,672	\$	\$ 4,978		
100	3,700	670,000	\$ 27,821	\$ (6,798)	\$ 21,022	\$ 16,059	\$	\$ 4,963		
100	2,800	576,848	\$ 24,414	\$ (5,853)	\$ 18,561	\$ 13,612	\$	\$ 4,948		
100	15,000	2,046,384	\$ 72,474	\$ (20,765)	\$ 51,710	\$ 46,781	\$	\$ 4,929		
100	3,650	665,000	\$ 27,564	\$ (6,748)	\$ 20,816	\$ 15,923	\$	\$ 4,893		
110	12,300	3,491,122	\$ 52,860	\$ (8,528)	\$ 44,332	\$ 39,440	\$	\$ 4,892		
100	5,000	829,779	\$ 32,890	\$ (8,420)	\$ 24,470	\$ 19,594	\$	\$ 4,876		
110	11,700	3,408,984	\$ 51,012	\$ (8,328)	\$ 42,685	\$ 37,809	\$	\$ 4,876		
100	3,000	589,082	\$ 25,000	\$ (5,977)	\$ 19,022	\$ 14,156	\$	\$ 4,866		
100	13,000	1,811,217	\$ 64,577	\$ (18,378)	\$ 46,199	\$ 41,343	\$	\$ 4,856		
100	3,400	635,803	\$ 26,523	\$ (6,451)	\$ 20,072	\$ 15,244	\$	\$ 4,828		
110	17,200	4,083,498	\$ 67,563	\$ (9,975)	\$ 57,587	\$ 52,762	\$	\$ 4,825		
100	3,400	620,000	\$ 26,338	\$ (6,291)	\$ 20,047	\$ 15,244	\$	\$ 4,803		
100	13,000	1,799,371	\$ 64,391	\$ (18,258)	\$ 46,133	\$ 41,343	\$	\$ 4,790		
100	5,200	933,200	\$ 34,366	\$ (9,469)	\$ 24,897	\$ 20,137	\$	\$ 4,759		
100	4,100	730,445	\$ 29,316	\$ (7,412)	\$ 21,905	\$ 17,147	\$	\$ 4,758		
100	3,800	686,498	\$ 28,033	\$ (6,966)	\$ 21,067	\$ 16,331	\$	\$ 4,736		
110	18,000	4,143,194	\$ 69,779	\$ (10,121)	\$ 59,658	\$ 54,937	\$	\$ 4,721		
100	3,850	700,000	\$ 28,255	\$ (7,103)	\$ 21,152	\$ 16,467	\$	\$ 4,685		
110	12,000	3,356,881	\$ 51,474	\$ (8,200)	\$ 43,273	\$ 38,625	\$	\$ 4,649		
100	5,000	828,065	\$ 32,639	\$ (8,402)	\$ 24,237	\$ 19,594	\$	\$ 4,643		
100	4,650	845,427	\$ 31,850	\$ (8,579)	\$ 23,271	\$ 18,642	\$	\$ 4,629		
110	23,000	4,736,826	\$ 84,728	\$ (11,571)	\$ 73,157	\$ 68,531	\$	\$ 4,626		
100	3,100	591,908	\$ 25,032	\$ (6,006)	\$ 19,026	\$ 14,428	\$	\$ 4,598		
100	4,000	703,917	\$ 28,615	\$ (7,143)	\$ 21,472	\$ 16,875	\$	\$ 4,597		
100	5,000	806,023	\$ 32,365	\$ (8,179)	\$ 24,186	\$ 19,594	\$	\$ 4,592		
100	4,000	711,839	\$ 28,687	\$ (7,223)	\$ 21,464	\$ 16,875	\$	\$ 4,590		
110	19,500	4,276,025	\$ 74,039	\$ (10,446)	\$ 63,593	\$ 59,015	\$	\$ 4,578		
100	2,500	528,083	\$ 22,717	\$ (5,358)	\$ 17,358	\$ 12,797	\$	\$ 4,561		
110	10,830	3,162,327	\$ 47,699	\$ (7,725)	\$ 39,974	\$ 35,444	\$	\$ 4,530		
100	4,000	691,821	\$ 28,425	\$ (7,020)	\$ 21,405	\$ 16,875	\$	\$ 4,530		
100	3,800	659,556	\$ 27,551	\$ (6,693)	\$ 20,859	\$ 16,331	\$	\$ 4,528		
100	3,500	622,787	\$ 26,345	\$ (6,319)	\$ 20,026	\$ 15,516	\$	\$ 4,510		
115	10,500	3,377,255	\$ 40,281	\$ (1,226)	\$ 39,056	\$ 34,547	\$	\$ 4,509		
100	4,250	775,100	\$ 29,924	\$ (7,865)	\$ 22,059	\$ 17,555	\$	\$ 4,505		
100	4,000	678,708	\$ 28,248	\$ (6,887)	\$ 21,361	\$ 16,875	\$	\$ 4,486		
110	11,000	3,161,789	\$ 48,105	\$ (7,724)	\$ 40,381	\$ 35,906	\$	\$ 4,475		
110	18,000	4,039,939	\$ 69,266	\$ (9,869)	\$ 59,397	\$ 54,937	\$	\$ 4,460		
100	3,200	602,144	\$ 25,226	\$ (6,110)	\$ 19,116	\$ 14,700	\$	\$ 4,416		
100	3,600	652,555	\$ 26,820	\$ (6,621)	\$ 20,198	\$ 15,787	\$	\$ 4,411		
110	13,000	3,381,693	\$ 53,997	\$ (8,261)	\$ 45,736	\$ 41,343	\$	\$ 4,392		
100	8,300	1,205,977	\$ 45,193	\$ (12,237)	\$ 32,956	\$ 28,565	\$	\$ 4,391		
100	4,800	784,988	\$ 31,394	\$ (7,965)	\$ 23,429	\$ 19,050	\$	\$ 4,379		
100	3,118	584,915	\$ 24,788	\$ (5,935)	\$ 18,852	\$ 14,477	\$	\$ 4,375		
100	10,000	1,406,356	\$ 51,778	\$ (14,270)	\$ 37,508	\$ 33,187	\$	\$ 4,320		
100	5,850	899,012	\$ 35,324	\$ (9,122)	\$ 26,202	\$ 21,905	\$	\$ 4,297		
100	3,500	650,000	\$ 26,405	\$ (6,596)	\$ 19,810	\$ 15,516	\$	\$ 4,294		
100	3,900	677,109	\$ 27,742	\$ (6,871)	\$ 20,871	\$ 16,603	\$	\$ 4,268		
100	3,000	581,243	\$ 24,318	\$ (5,898)	\$ 18,420	\$ 14,156	\$	\$ 4,264		
100	3,250	590,300	\$ 25,077	\$ (5,990)	\$ 19,087	\$ 14,836	\$	\$ 4,251		
100	3,700	667,000	\$ 27,047	\$ (6,768)	\$ 20,279	\$ 16,059	\$	\$ 4,220		
100	4,900	790,799	\$ 31,517	\$ (8,024)	\$ 23,493	\$ 19,322	\$	\$ 4,171		
100	3,400	613,121	\$ 25,604	\$ (6,221)	\$ 19,382	\$ 15,244	\$	\$ 4,139		
100	3,500	634,000	\$ 26,087	\$ (6,433)	\$ 19,653	\$ 15,516	\$	\$ 4,138		
115	10,500	3,205,075	\$ 39,818	\$ (1,163)	\$ 38,655	\$ 34,547	\$	\$ 4,109		
115	8,000	2,852,378	\$ 32,870	\$ (1,035)	\$ 31,835	\$ 27,750	\$	\$ 4,085		
100	3,250	592,772	\$ 24,935	\$ (6,015)	\$ 18,921	\$ 14,836	\$	\$ 4,085		
100	4,875	780,395	\$ 31,256	\$ (7,919)	\$ 23,337	\$ 19,254	\$	\$ 4,083		
100	4,000	683,499	\$ 27,881	\$ (6,935)	\$ 20,946	\$ 16,875	\$	\$ 4,071		
100	3,400	616,000	\$ 25,549	\$ (6,251)	\$ 19,299	\$ 15,244	\$	\$ 4,055		
110	11,362	3,040,124	\$ 48,369	\$ (7,427)	\$ 40,943	\$ 36,890	\$	\$ 4,052		
100	2,800	535,961	\$ 23,102	\$ (5,438)	\$ 17,663	\$ 13,612	\$	\$ 4,051		
110	14,000	3,366,354	\$ 56,321	\$ (8,223)	\$ 48,097	\$ 44,062	\$	\$ 4,035		
100	4,300	698,593	\$ 28,802	\$ (7,089)	\$ 21,713	\$ 17,691	\$	\$ 4,023		
100	4,500	737,025	\$ 29,726	\$ (7,479)	\$ 22,248	\$ 18,234	\$	\$ 4,013		
110	18,515	3,926,969	\$ 69,941	\$ (9,593)	\$ 60,348	\$ 56,337	\$	\$ 4,011		
100	3,000	566,483	\$ 23,883	\$ (5,748)	\$ 18,135	\$ 14,156	\$	\$ 3,978		
100	3,000	546,000	\$ 23,660	\$ (5,540)	\$ 18,120	\$ 14,156	\$	\$ 3,964		
100	5,300	816,209	\$ 32,644	\$ (8,282)	\$ 24,362	\$ 20,409	\$	\$ 3,953		
100	27,000	3,519,949	\$ 119,075	\$ (35,717)	\$ 83,358	\$ 79,406	\$	\$ 3,952		
100	7,000	1,035,200	\$ 39,450	\$ (10,504)	\$ 28,946	\$ 25,031	\$	\$ 3,915		
100	3,500	608,675	\$ 25,606	\$ (6,176)	\$ 19,429	\$ 15,516	\$	\$ 3,914		
100	3,200	579,082	\$ 24,470	\$ (5,876)	\$ 18,594	\$ 14,700	\$	\$ 3,894		
100	3,200	580,000	\$ 24,475	\$ (5,885)	\$ 18,589	\$ 14,700	\$	\$ 3,889		
100	3,500	633,453	\$ 25,821	\$ (6,428)	\$ 19,394	\$ 15,516	\$	\$ 3,878		
100	4,000	658,126	\$ 27,403	\$ (6,678)	\$ 20,725	\$ 16,875	\$	\$ 3,850		
100	4,400	795,100	\$ 29,880	\$ (8,068)	\$ 21,812	\$ 17,962	\$	\$ 3,849		
100	3,000	534,601	\$ 23,417	\$ (5,425)	\$ 17,992	\$ 14,156	\$	\$ 3,836		
100	4,000	671,986	\$ 27,527	\$ (6,819)	\$ 20,708	\$ 16,875	\$	\$ 3,833		
100	6,000	902,016	\$ 35,290	\$ (9,153)	\$ 26,137	\$ 22,312	\$	\$ 3,824		
100	3,050	550,000	\$ 23,672	\$ (5,581)	\$ 18,091	\$ 14,292	\$	\$ 3,799		

Rate Class	Contract Demand	Annual Volume m3	Adjustments including DSM, less Storage and Distribution			Adjusted Bundled Distribution Revenue (\$)	Rate 300 Distribution Revenue (\$)	Rate 125 Distribution Revenue (\$)	Bundled Rate vs Bundled Rate vs	
			Bundled Distribution Revenue (\$)	Commodity	Distribution				Rate 300	Rate 125
100	3,800	642,906	\$ 26,653	\$ (6,524)	\$ 20,129	\$ 16,331	\$	\$	3,798	
100	7,000	1,038,274	\$ 39,340	\$ (10,535)	\$ 28,805	\$ 25,031	\$	\$	3,774	
100	3,750	632,056	\$ 26,375	\$ (6,413)	\$ 19,961	\$ 16,195	\$	\$	3,766	
110	15,500	3,445,783	\$ 60,315	\$ (8,417)	\$ 51,898	\$ 48,140	\$	\$	3,757	
100	3,400	585,940	\$ 24,936	\$ (5,946)	\$ 18,991	\$ 15,244	\$	\$	3,747	
100	2,910	530,000	\$ 23,037	\$ (5,378)	\$ 17,659	\$ 13,912	\$	\$	3,747	
100	2,500	496,683	\$ 21,564	\$ (5,040)	\$ 16,524	\$ 12,797	\$	\$	3,728	
100	3,300	579,560	\$ 24,573	\$ (5,881)	\$ 18,692	\$ 14,972	\$	\$	3,720	
100	2,100	444,286	\$ 19,930	\$ (4,508)	\$ 15,422	\$ 11,709	\$	\$	3,712	
100	3,000	557,561	\$ 23,523	\$ (5,658)	\$ 17,865	\$ 14,156	\$	\$	3,709	
100	4,100	676,260	\$ 27,703	\$ (6,862)	\$ 20,841	\$ 17,147	\$	\$	3,694	
100	4,960	782,033	\$ 31,104	\$ (7,935)	\$ 23,169	\$ 19,485	\$	\$	3,684	
110	17,000	3,605,966	\$ 64,711	\$ (8,809)	\$ 55,902	\$ 52,218	\$	\$	3,684	
100	9,500	1,332,242	\$ 49,025	\$ (13,518)	\$ 35,507	\$ 31,828	\$	\$	3,679	
100	6,700	986,065	\$ 37,882	\$ (10,006)	\$ 27,877	\$ 24,215	\$	\$	3,661	
100	3,900	655,379	\$ 26,910	\$ (6,650)	\$ 20,260	\$ 16,603	\$	\$	3,657	
100	4,500	722,928	\$ 29,215	\$ (7,336)	\$ 21,879	\$ 18,234	\$	\$	3,645	
100	3,100	548,000	\$ 23,624	\$ (5,561)	\$ 18,064	\$ 14,428	\$	\$	3,636	
100	6,000	884,259	\$ 34,895	\$ (8,973)	\$ 25,922	\$ 22,312	\$	\$	3,610	
115	10,000	2,921,372	\$ 37,856	\$ (1,060)	\$ 36,795	\$ 33,187	\$	\$	3,608	
100	5,090	793,181	\$ 31,494	\$ (8,048)	\$ 23,446	\$ 19,838	\$	\$	3,608	
100	4,500	723,723	\$ 29,184	\$ (7,344)	\$ 21,841	\$ 18,234	\$	\$	3,606	
100	7,500	1,072,001	\$ 40,858	\$ (10,878)	\$ 29,981	\$ 26,390	\$	\$	3,590	
110	16,800	3,540,369	\$ 63,905	\$ (8,649)	\$ 55,256	\$ 51,675	\$	\$	3,582	
100	3,400	573,518	\$ 24,635	\$ (5,819)	\$ 18,815	\$ 15,244	\$	\$	3,572	
100	6,700	979,258	\$ 37,724	\$ (9,937)	\$ 27,787	\$ 24,215	\$	\$	3,572	
100	4,600	723,693	\$ 29,420	\$ (7,343)	\$ 22,077	\$ 18,506	\$	\$	3,570	
110	13,000	3,052,045	\$ 52,360	\$ (7,456)	\$ 44,904	\$ 41,343	\$	\$	3,560	
100	3,500	580,507	\$ 24,957	\$ (5,890)	\$ 19,066	\$ 15,516	\$	\$	3,551	
100	3,300	580,605	\$ 24,400	\$ (5,891)	\$ 18,508	\$ 14,972	\$	\$	3,537	
100	3,800	634,089	\$ 26,297	\$ (6,434)	\$ 19,863	\$ 16,331	\$	\$	3,532	
110	14,000	3,156,385	\$ 55,278	\$ (7,711)	\$ 47,567	\$ 44,062	\$	\$	3,505	
100	3,800	631,774	\$ 26,246	\$ (6,411)	\$ 19,836	\$ 16,331	\$	\$	3,505	
110	12,600	2,978,974	\$ 51,037	\$ (7,277)	\$ 43,759	\$ 40,256	\$	\$	3,503	
100	2,700	491,215	\$ 21,808	\$ (4,984)	\$ 16,824	\$ 13,341	\$	\$	3,483	
100	2,700	488,000	\$ 21,773	\$ (4,952)	\$ 16,822	\$ 13,341	\$	\$	3,481	
110	16,900	3,512,300	\$ 64,006	\$ (8,580)	\$ 55,426	\$ 51,947	\$	\$	3,479	
100	3,500	581,511	\$ 24,883	\$ (5,901)	\$ 18,982	\$ 15,516	\$	\$	3,467	
100	3,550	645,000	\$ 25,662	\$ (6,545)	\$ 19,118	\$ 15,651	\$	\$	3,466	
100	3,050	554,000	\$ 23,378	\$ (5,621)	\$ 17,757	\$ 14,292	\$	\$	3,465	
100	3,250	574,918	\$ 24,126	\$ (5,834)	\$ 18,293	\$ 14,836	\$	\$	3,457	
100	3,136	553,311	\$ 23,594	\$ (5,614)	\$ 17,980	\$ 14,526	\$	\$	3,454	
100	2,700	500,000	\$ 21,863	\$ (5,073)	\$ 16,789	\$ 13,341	\$	\$	3,449	
100	3,700	611,951	\$ 25,705	\$ (6,209)	\$ 19,496	\$ 16,059	\$	\$	3,437	
110	13,000	3,000,717	\$ 52,105	\$ (7,330)	\$ 44,774	\$ 41,343	\$	\$	3,431	
100	1,200	210,000	\$ 9,416	\$ (2,131)	\$ 7,285	\$ 3,859	\$	\$	3,426	
100	3,000	543,528	\$ 23,086	\$ (5,515)	\$ 17,571	\$ 14,156	\$	\$	3,414	
100	2,850	516,000	\$ 22,394	\$ (5,236)	\$ 17,158	\$ 13,748	\$	\$	3,410	
110	13,000	2,991,492	\$ 52,059	\$ (7,308)	\$ 44,751	\$ 41,343	\$	\$	3,408	
110	23,000	4,252,908	\$ 82,324	\$ (10,389)	\$ 71,935	\$ 68,531	\$	\$	3,404	
100	2,950	530,000	\$ 22,802	\$ (5,378)	\$ 17,424	\$ 14,020	\$	\$	3,404	
100	3,400	585,404	\$ 24,586	\$ (5,940)	\$ 18,646	\$ 15,244	\$	\$	3,402	
100	3,500	593,069	\$ 24,928	\$ (6,018)	\$ 18,910	\$ 15,516	\$	\$	3,395	
100	3,100	558,565	\$ 23,487	\$ (5,668)	\$ 17,819	\$ 14,428	\$	\$	3,391	
100	8,900	1,229,212	\$ 46,050	\$ (12,473)	\$ 33,577	\$ 30,197	\$	\$	3,380	
100	4,300	707,000	\$ 28,226	\$ (7,174)	\$ 21,052	\$ 17,691	\$	\$	3,361	
100	5,000	769,361	\$ 30,742	\$ (7,807)	\$ 22,935	\$ 19,594	\$	\$	3,341	
100	3,900	622,201	\$ 26,254	\$ (6,313)	\$ 19,940	\$ 16,603	\$	\$	3,337	
110	16,000	3,341,762	\$ 60,999	\$ (8,163)	\$ 52,835	\$ 49,500	\$	\$	3,335	
115	6,250	2,282,822	\$ 27,139	\$ (829)	\$ 26,310	\$ 22,992	\$	\$	3,318	
100	5,500	832,806	\$ 32,719	\$ (8,450)	\$ 24,268	\$ 20,953	\$	\$	3,315	
115	8,000	2,521,395	\$ 31,980	\$ (915)	\$ 31,065	\$ 27,750	\$	\$	3,315	
100	2,950	535,799	\$ 22,763	\$ (5,437)	\$ 17,327	\$ 14,020	\$	\$	3,306	
100	2,850	519,404	\$ 22,295	\$ (5,270)	\$ 17,024	\$ 13,748	\$	\$	3,276	
100	3,000	538,240	\$ 22,889	\$ (5,462)	\$ 17,428	\$ 14,156	\$	\$	3,272	
100	2,300	451,191	\$ 20,096	\$ (4,578)	\$ 15,518	\$ 12,253	\$	\$	3,265	
100	2,800	507,000	\$ 22,012	\$ (5,145)	\$ 16,868	\$ 13,612	\$	\$	3,256	
100	2,600	461,617	\$ 20,987	\$ (4,684)	\$ 16,303	\$ 13,069	\$	\$	3,234	
100	3,800	614,718	\$ 25,800	\$ (6,238)	\$ 19,563	\$ 16,331	\$	\$	3,231	
100	4,500	689,928	\$ 28,463	\$ (7,001)	\$ 21,462	\$ 18,234	\$	\$	3,228	
100	3,900	615,666	\$ 26,073	\$ (6,247)	\$ 19,826	\$ 16,603	\$	\$	3,223	
110	20,000	3,798,589	\$ 72,868	\$ (9,279)	\$ 63,588	\$ 60,375	\$	\$	3,214	
115	6,000	2,200,092	\$ 26,316	\$ (798)	\$ 25,518	\$ 22,312	\$	\$	3,205	
100	2,960	510,762	\$ 22,430	\$ (5,183)	\$ 17,247	\$ 14,047	\$	\$	3,200	
100	4,220	664,432	\$ 27,412	\$ (6,742)	\$ 20,670	\$ 17,473	\$	\$	3,197	
100	3,000	520,274	\$ 22,631	\$ (5,279)	\$ 17,352	\$ 14,156	\$	\$	3,196	
100	6,700	965,745	\$ 37,208	\$ (9,799)	\$ 27,408	\$ 24,215	\$	\$	3,193	
100	8,800	1,218,335	\$ 45,456	\$ (12,362)	\$ 33,094	\$ 29,925	\$	\$	3,169	
110	21,000	3,905,378	\$ 75,798	\$ (9,540)	\$ 66,258	\$ 63,093	\$	\$	3,164	
100	3,000	497,928	\$ 22,294	\$ (5,052)	\$ 17,242	\$ 14,156	\$	\$	3,086	
100	2,750	497,000	\$ 21,587	\$ (5,043)	\$ 16,544	\$ 13,477	\$	\$	3,067	
100	3,000	498,591	\$ 22,281	\$ (5,059)	\$ 17,222	\$ 14,156	\$	\$	3,066	
100	4,500	690,275	\$ 28,300	\$ (7,004)	\$ 21,296	\$ 18,234	\$	\$	3,062	
100	6,000	862,863	\$ 34,124	\$ (8,755)	\$ 25,368	\$ 22,312	\$	\$	3,056	
100	2,800	510,869	\$ 21,851	\$ (5,184)	\$ 16,668	\$ 13,612	\$	\$	3,055	
100	10,500	1,421,348	\$ 52,013	\$ (14,422)	\$ 37,591	\$ 34,547	\$	\$	3,044	
110	9,800	2,441,811	\$ 41,648	\$ (5,965)	\$ 35,684	\$ 32,644	\$	\$	3,040	
100	4,000	634,644	\$ 26,333	\$ (6,440)	\$ 19,893	\$ 16,875	\$	\$	3,018	
100	3,800	608,708	\$ 25,516	\$ (6,177)	\$ 19,339	\$ 16,331	\$	\$	3,008	
100	3,700	580,610	\$ 24,959	\$ (5,891)	\$ 19,067	\$ 16,059	\$	\$	3,008	
100	4,700	726,561	\$ 29,152	\$ (7,372)	\$ 21,780	\$ 18,778	\$	\$	3,002	
100	3,000	513,712	\$ 22,359	\$ (5,213)	\$ 17,147	\$ 14,156	\$	\$	2,990	
100	3,400	561,477	\$ 23,928	\$ (5,697)	\$ 18,231	\$ 15,244	\$	\$	2,987	
100	4,000	691,529	\$ 26,871	\$ (7,017)	\$ 19,854	\$ 16,875	\$	\$	2,979	

Rate Class	Contract Demand	Annual Volume m3	Adjustments including DSM, less Storage and Distribution			Adjusted Bundled Distribution Revenue (\$)	Rate 300 Distribution Revenue (\$)	Rate 125 Distribution Revenue (\$)	Bundled Rate vs Rate 300	Bundled Rate vs Rate 125
			Bundled Distribution Revenue (\$)	Distribution Commodity	Distribution Revenue (\$)					
100	2,662	474,585	\$ 21,021	\$ (4,816)	\$ 16,206	\$ 13,237	\$	2,968		
100	3,550	582,314	\$ 24,528	\$ (5,909)	\$ 18,620	\$ 15,651	\$	2,968		
100	2,900	525,158	\$ 22,171	\$ (5,329)	\$ 16,842	\$ 13,884	\$	2,958		
110	13,800	2,913,157	\$ 53,590	\$ (7,116)	\$ 46,473	\$ 43,518	\$	2,955		
100	4,500	669,726	\$ 27,957	\$ (6,796)	\$ 21,162	\$ 18,234	\$	2,927		
100	2,600	473,000	\$ 20,793	\$ (4,800)	\$ 15,994	\$ 13,069	\$	2,925		
100	4,000	628,307	\$ 26,165	\$ (6,375)	\$ 19,790	\$ 16,875	\$	2,915		
100	3,400	538,196	\$ 23,609	\$ (5,461)	\$ 18,148	\$ 15,244	\$	2,905		
100	4,000	621,263	\$ 26,078	\$ (6,304)	\$ 19,774	\$ 16,875	\$	2,899		
110	16,000	3,161,666	\$ 60,104	\$ (7,723)	\$ 52,381	\$ 49,500	\$	2,881		
100	5,000	728,851	\$ 29,869	\$ (7,396)	\$ 22,474	\$ 19,594	\$	2,880		
100	2,850	520,000	\$ 21,892	\$ (5,276)	\$ 16,616	\$ 13,748	\$	2,867		
110	12,000	2,649,423	\$ 47,960	\$ (6,472)	\$ 41,488	\$ 38,625	\$	2,863		
110	8,000	2,138,971	\$ 35,824	\$ (5,225)	\$ 30,599	\$ 27,750	\$	2,849		
100	2,850	515,266	\$ 21,808	\$ (5,228)	\$ 16,580	\$ 13,748	\$	2,831		
100	5,100	738,526	\$ 30,182	\$ (7,494)	\$ 22,688	\$ 19,866	\$	2,823		
100	2,550	460,000	\$ 20,417	\$ (4,668)	\$ 15,749	\$ 12,933	\$	2,816		
100	2,310	420,000	\$ 19,357	\$ (4,262)	\$ 15,095	\$ 12,280	\$	2,815		
110	7,819	2,092,325	\$ 35,158	\$ (5,111)	\$ 30,047	\$ 27,258	\$	2,789		
100	5,000	727,587	\$ 29,763	\$ (7,383)	\$ 22,380	\$ 19,594	\$	2,786		
100	4,500	678,514	\$ 27,897	\$ (6,885)	\$ 21,012	\$ 18,234	\$	2,777		
100	3,500	552,573	\$ 23,888	\$ (5,607)	\$ 18,281	\$ 15,516	\$	2,765		
115	5,500	1,942,217	\$ 24,423	\$ (705)	\$ 23,718	\$ 20,953	\$	2,765		
100	6,050	864,247	\$ 33,957	\$ (8,769)	\$ 25,187	\$ 22,448	\$	2,739		
100	6,000	844,832	\$ 33,620	\$ (8,572)	\$ 25,047	\$ 22,312	\$	2,735		
110	14,000	2,851,175	\$ 53,762	\$ (6,965)	\$ 46,797	\$ 44,062	\$	2,735		
100	2,750	502,200	\$ 21,299	\$ (5,096)	\$ 16,203	\$ 13,477	\$	2,727		
110	16,000	3,100,436	\$ 59,800	\$ (7,574)	\$ 52,226	\$ 49,500	\$	2,726		
100	2,550	454,000	\$ 20,260	\$ (4,607)	\$ 15,654	\$ 12,933	\$	2,721		
100	2,800	495,205	\$ 21,355	\$ (5,025)	\$ 16,330	\$ 13,612	\$	2,718		
100	3,300	531,768	\$ 23,084	\$ (5,396)	\$ 17,688	\$ 14,972	\$	2,716		
100	5,000	736,220	\$ 29,778	\$ (7,470)	\$ 22,308	\$ 19,594	\$	2,714		
100	6,000	340,049	\$ 13,548	\$ (3,450)	\$ 10,098	\$ 7,437	\$	2,660		
100	2,400	436,611	\$ 19,589	\$ (4,430)	\$ 15,158	\$ 12,525	\$	2,633		
100	3,200	577,500	\$ 23,188	\$ (5,860)	\$ 17,328	\$ 14,700	\$	2,628		
100	7,000	963,431	\$ 37,427	\$ (9,776)	\$ 27,651	\$ 25,031	\$	2,620		
100	2,500	450,000	\$ 19,982	\$ (4,566)	\$ 15,415	\$ 12,797	\$	2,619		
100	2,500	451,000	\$ 19,966	\$ (4,576)	\$ 15,390	\$ 12,797	\$	2,593		
100	8,000	1,086,788	\$ 41,370	\$ (11,028)	\$ 30,342	\$ 27,750	\$	2,593		
100	2,350	422,000	\$ 19,262	\$ (4,282)	\$ 14,980	\$ 12,389	\$	2,591		
100	3,399	540,763	\$ 23,305	\$ (5,487)	\$ 17,818	\$ 15,241	\$	2,577		
100	2,400	423,016	\$ 19,382	\$ (4,292)	\$ 15,089	\$ 12,525	\$	2,564		
110	12,000	2,530,056	\$ 47,367	\$ (6,181)	\$ 41,186	\$ 38,625	\$	2,562		
100	3,450	628,000	\$ 24,313	\$ (6,372)	\$ 17,941	\$ 15,380	\$	2,561		
100	6,400	885,555	\$ 34,937	\$ (8,986)	\$ 25,951	\$ 23,400	\$	2,551		
100	2,500	444,521	\$ 19,849	\$ (4,511)	\$ 15,338	\$ 12,797	\$	2,541		
100	3,000	504,984	\$ 21,821	\$ (5,124)	\$ 16,697	\$ 14,156	\$	2,541		
110	12,300	2,556,584	\$ 48,219	\$ (6,245)	\$ 41,973	\$ 39,440	\$	2,533		
100	8,100	1,096,955	\$ 41,685	\$ (11,131)	\$ 30,554	\$ 28,022	\$	2,532		
100	4,740	706,306	\$ 28,586	\$ (7,167)	\$ 21,419	\$ 18,887	\$	2,532		
110	16,900	3,136,524	\$ 62,139	\$ (7,662)	\$ 54,477	\$ 51,947	\$	2,531		
100	3,500	542,806	\$ 23,552	\$ (5,508)	\$ 18,044	\$ 15,516	\$	2,529		
110	6,000	1,751,298	\$ 29,099	\$ (4,278)	\$ 24,821	\$ 22,312	\$	2,508		
110	9,500	2,190,207	\$ 39,679	\$ (5,350)	\$ 34,328	\$ 31,828	\$	2,501		
100	2,820	514,000	\$ 21,339	\$ (5,216)	\$ 16,124	\$ 13,667	\$	2,457		
100	8,400	1,125,888	\$ 42,708	\$ (11,424)	\$ 31,284	\$ 28,837	\$	2,447		
110	6,500	1,786,482	\$ 30,473	\$ (4,364)	\$ 26,109	\$ 23,672	\$	2,438		
110	7,800	1,950,397	\$ 34,408	\$ (4,765)	\$ 29,643	\$ 27,206	\$	2,437		
110	9,000	2,101,367	\$ 38,037	\$ (5,133)	\$ 32,904	\$ 30,469	\$	2,436		
110	9,000	2,100,482	\$ 38,033	\$ (5,131)	\$ 32,902	\$ 30,469	\$	2,433		
100	8,000	1,076,227	\$ 41,102	\$ (10,920)	\$ 30,182	\$ 27,750	\$	2,432		
100	2,200	394,000	\$ 18,410	\$ (3,998)	\$ 14,412	\$ 11,981	\$	2,430		
100	5,000	717,792	\$ 29,297	\$ (7,283)	\$ 22,014	\$ 19,594	\$	2,420		
110	15,000	2,848,547	\$ 56,149	\$ (6,959)	\$ 49,190	\$ 46,781	\$	2,409		
100	2,650	476,000	\$ 20,438	\$ (4,830)	\$ 15,608	\$ 13,205	\$	2,403		
100	2,000	384,837	\$ 17,741	\$ (3,905)	\$ 13,836	\$ 11,437	\$	2,398		
100	3,100	488,000	\$ 21,773	\$ (4,952)	\$ 16,822	\$ 14,428	\$	2,394		
100	4,600	680,842	\$ 27,805	\$ (6,908)	\$ 20,896	\$ 18,506	\$	2,390		
100	5,000	726,836	\$ 29,358	\$ (7,375)	\$ 21,983	\$ 19,594	\$	2,389		
100	2,500	435,022	\$ 19,596	\$ (4,414)	\$ 15,181	\$ 12,797	\$	2,385		
110	12,500	2,517,499	\$ 48,504	\$ (6,150)	\$ 42,355	\$ 39,984	\$	2,370		
100	3,700	576,864	\$ 24,266	\$ (5,853)	\$ 18,413	\$ 16,059	\$	2,354		
100	3,400	577,964	\$ 23,448	\$ (5,865)	\$ 17,583	\$ 15,244	\$	2,339		
110	13,300	2,600,529	\$ 50,837	\$ (6,353)	\$ 44,484	\$ 42,159	\$	2,325		
100	3,400	522,608	\$ 22,869	\$ (5,303)	\$ 17,566	\$ 15,244	\$	2,323		
100	2,120	386,000	\$ 17,994	\$ (3,917)	\$ 14,078	\$ 11,764	\$	2,314		
100	2,000	380,789	\$ 17,608	\$ (3,864)	\$ 13,744	\$ 11,437	\$	2,307		
115	4,500	1,604,966	\$ 21,116	\$ (582)	\$ 20,533	\$ 18,234	\$	2,299		
100	3,150	509,573	\$ 22,032	\$ (5,171)	\$ 16,861	\$ 14,564	\$	2,297		
110	12,300	2,460,820	\$ 47,743	\$ (6,011)	\$ 41,732	\$ 39,440	\$	2,291		
100	3,400	521,646	\$ 22,826	\$ (5,293)	\$ 17,533	\$ 15,244	\$	2,289		
110	16,000	2,926,019	\$ 58,934	\$ (7,148)	\$ 51,786	\$ 49,500	\$	2,286		
100	4,000	610,113	\$ 25,350	\$ (6,191)	\$ 19,160	\$ 16,875	\$	2,285		
100	5,200	741,356	\$ 29,943	\$ (7,523)	\$ 22,421	\$ 20,137	\$	2,283		
100	5,700	787,986	\$ 31,766	\$ (7,996)	\$ 23,770	\$ 21,497	\$	2,273		
100	2,000	392,849	\$ 17,694	\$ (3,986)	\$ 13,708	\$ 11,437	\$	2,270		
100	3,050	490,050	\$ 21,533	\$ (4,973)	\$ 16,561	\$ 14,292	\$	2,269		
100	4,800	693,445	\$ 28,353	\$ (7,036)	\$ 21,317	\$ 19,050	\$	2,267		
100	3,500	533,890	\$ 23,186	\$ (5,417)	\$ 17,769	\$ 15,516	\$	2,253		
100	3,700	578,381	\$ 24,178	\$ (5,869)	\$ 18,309	\$ 16,059	\$	2,250		
100	5,900	812,964	\$ 32,522	\$ (8,249)	\$ 24,273	\$ 22,041	\$	2,233		
100	3,000	482,674	\$ 21,286	\$ (4,898)	\$ 16,388	\$ 14,156	\$	2,232		
100	2,610	475,000	\$ 20,143	\$ (4,820)	\$ 15,323	\$ 13,096	\$	2,227		
110	13,000	2,522,942	\$ 49,731	\$ (6,163)	\$ 43,568	\$ 41,343	\$	2,225		

Rate Class	Contract Demand	Annual Volume m3	Adjustments including DSM, less Storage and Distribution			Adjusted Bundled Distribution Revenue (\$)	Rate 300 Distribution Revenue (\$)	Rate 125 Distribution Revenue (\$)	Bundled Rate vs Rate 300	Bundled Rate vs Rate 125
			Bundled Distribution Revenue (\$)	Commodity	Distribution					
100	2,500	442,633	\$ 19,505	\$ (4,491)	\$ 15,014	\$ 12,797	\$	2,217		
100	2,100	380,500	\$ 17,775	\$ (3,861)	\$ 13,914	\$ 11,709	\$	2,204		
110	14,200	2,660,960	\$ 53,297	\$ (6,500)	\$ 46,797	\$ 44,606	\$	2,191		
100	2,550	423,555	\$ 19,410	\$ (4,298)	\$ 15,112	\$ 12,933	\$	2,179		
110	9,800	2,099,688	\$ 39,949	\$ (5,129)	\$ 34,820	\$ 32,644	\$	2,176		
100	2,150	390,000	\$ 17,978	\$ (3,957)	\$ 14,021	\$ 11,845	\$	2,176		
100	3,000	474,460	\$ 21,124	\$ (4,814)	\$ 16,310	\$ 14,156	\$	2,154		
100	4,000	591,818	\$ 25,033	\$ (6,005)	\$ 19,028	\$ 16,875	\$	2,153		
100	3,500	541,606	\$ 23,160	\$ (5,496)	\$ 17,664	\$ 15,516	\$	2,149		
110	10,000	2,101,077	\$ 40,436	\$ (5,133)	\$ 35,303	\$ 33,187	\$	2,116		
100	4,400	636,465	\$ 26,525	\$ (6,458)	\$ 20,067	\$ 17,962	\$	2,104		
100	2,100	383,000	\$ 17,683	\$ (3,886)	\$ 13,796	\$ 11,709	\$	2,087		
100	4,500	650,040	\$ 26,913	\$ (6,596)	\$ 20,317	\$ 18,234	\$	2,083		
100	7,500	1,025,059	\$ 38,873	\$ (10,401)	\$ 28,472	\$ 26,390	\$	2,081		
110	14,400	2,641,515	\$ 53,680	\$ (6,453)	\$ 47,228	\$ 45,150	\$	2,078		
100	2,700	446,173	\$ 19,938	\$ (4,527)	\$ 15,411	\$ 13,341	\$	2,070		
110	5,136	1,468,316	\$ 25,620	\$ (3,587)	\$ 22,033	\$ 19,963	\$	2,069		
100	6,000	815,623	\$ 32,656	\$ (8,276)	\$ 24,380	\$ 22,312	\$	2,068		
100	5,000	701,178	\$ 28,766	\$ (7,115)	\$ 21,651	\$ 19,594	\$	2,058		
100	2,000	362,000	\$ 17,166	\$ (3,673)	\$ 13,492	\$ 11,437	\$	2,055		
100	2,000	360,000	\$ 17,137	\$ (3,653)	\$ 13,484	\$ 11,437	\$	2,046		
100	2,000	360,000	\$ 17,137	\$ (3,653)	\$ 13,484	\$ 11,437	\$	2,046		
110	8,000	1,820,236	\$ 34,241	\$ (4,447)	\$ 29,795	\$ 27,750	\$	2,045		
100	3,000	479,204	\$ 21,063	\$ (4,862)	\$ 16,200	\$ 14,156	\$	2,044		
110	6,000	1,558,929	\$ 28,143	\$ (3,808)	\$ 24,335	\$ 22,312	\$	2,023		
100	6,000	908,163	\$ 33,543	\$ (9,215)	\$ 24,328	\$ 22,312	\$	2,016		
110	9,900	2,048,407	\$ 39,934	\$ (5,004)	\$ 34,931	\$ 32,915	\$	2,015		
100	4,446	641,803	\$ 26,613	\$ (6,512)	\$ 20,101	\$ 18,087	\$	2,013		
100	8,230	1,102,318	\$ 41,570	\$ (11,185)	\$ 30,385	\$ 28,375	\$	2,010		
100	3,000	465,398	\$ 20,877	\$ (4,722)	\$ 16,155	\$ 14,156	\$	1,999		
110	10,000	2,053,194	\$ 40,198	\$ (5,016)	\$ 35,183	\$ 33,187	\$	1,995		
100	10,000	1,301,432	\$ 48,385	\$ (13,206)	\$ 35,179	\$ 33,187	\$	1,992		
100	2,550	457,000	\$ 19,558	\$ (4,637)	\$ 14,921	\$ 12,933	\$	1,988		
110	9,250	1,954,558	\$ 37,908	\$ (4,775)	\$ 33,134	\$ 31,148	\$	1,985		
100	2,000	374,859	\$ 17,222	\$ (3,804)	\$ 13,419	\$ 11,437	\$	1,981		
100	3,210	502,438	\$ 21,789	\$ (5,098)	\$ 16,691	\$ 14,727	\$	1,964		
100	4,600	658,959	\$ 27,154	\$ (6,686)	\$ 20,468	\$ 18,506	\$	1,962		
110	6,400	1,585,223	\$ 29,234	\$ (3,872)	\$ 25,361	\$ 23,400	\$	1,961		
110	5,100	1,418,773	\$ 25,287	\$ (3,466)	\$ 21,821	\$ 19,866	\$	1,956		
100	4,200	612,263	\$ 25,584	\$ (6,213)	\$ 19,371	\$ 17,419	\$	1,952		
110	5,600	1,480,184	\$ 26,792	\$ (3,616)	\$ 23,176	\$ 21,225	\$	1,951		
100	11,000	1,424,620	\$ 52,306	\$ (14,456)	\$ 37,850	\$ 35,906	\$	1,944		
110	4,700	1,363,000	\$ 24,050	\$ (3,330)	\$ 20,720	\$ 18,778	\$	1,942		
110	6,300	1,564,768	\$ 28,892	\$ (3,822)	\$ 25,070	\$ 23,128	\$	1,942		
115	4,100	1,393,763	\$ 19,588	\$ (506)	\$ 19,082	\$ 17,147	\$	1,935		
100	2,100	371,000	\$ 17,409	\$ (3,765)	\$ 13,644	\$ 11,709	\$	1,935		
100	2,450	444,000	\$ 19,100	\$ (4,505)	\$ 14,594	\$ 12,661	\$	1,933		
110	7,300	1,686,279	\$ 31,896	\$ (4,119)	\$ 27,776	\$ 25,847	\$	1,930		
100	3,150	572,200	\$ 22,296	\$ (5,806)	\$ 16,490	\$ 14,564	\$	1,926		
100	3,000	463,794	\$ 20,788	\$ (4,706)	\$ 16,082	\$ 14,156	\$	1,926		
115	5,200	1,540,000	\$ 22,621	\$ (559)	\$ 22,062	\$ 20,137	\$	1,925		
110	12,500	2,338,884	\$ 47,617	\$ (5,714)	\$ 41,904	\$ 39,984	\$	1,920		
110	13,500	2,464,958	\$ 50,643	\$ (6,021)	\$ 44,622	\$ 42,703	\$	1,919		
100	18,000	2,278,028	\$ 79,965	\$ (23,115)	\$ 56,850	\$ 54,937	\$	1,913		
100	2,110	384,000	\$ 17,541	\$ (3,896)	\$ 13,644	\$ 11,737	\$	1,908		
110	5,500	1,449,275	\$ 26,399	\$ (3,540)	\$ 22,858	\$ 20,953	\$	1,905		
100	6,000	821,765	\$ 32,548	\$ (8,338)	\$ 24,209	\$ 22,312	\$	1,897		
100	2,150	384,000	\$ 17,636	\$ (3,896)	\$ 13,739	\$ 11,845	\$	1,894		
100	3,000	453,362	\$ 20,643	\$ (4,600)	\$ 16,043	\$ 14,156	\$	1,887		
100	3,500	526,730	\$ 22,741	\$ (5,345)	\$ 17,396	\$ 15,516	\$	1,880		
110	7,700	1,717,170	\$ 33,009	\$ (4,195)	\$ 28,814	\$ 26,934	\$	1,880		
110	7,000	1,628,717	\$ 30,890	\$ (3,979)	\$ 26,911	\$ 25,031	\$	1,880		
100	1,865	340,481	\$ 16,397	\$ (3,455)	\$ 12,942	\$ 11,070	\$	1,871		
100	2,800	457,299	\$ 20,123	\$ (4,640)	\$ 15,483	\$ 13,612	\$	1,870		
100	3,000	455,351	\$ 20,645	\$ (4,620)	\$ 16,024	\$ 14,156	\$	1,868		
100	3,290	513,882	\$ 22,017	\$ (5,214)	\$ 16,802	\$ 14,945	\$	1,858		
110	4,500	1,303,341	\$ 23,274	\$ (3,184)	\$ 20,090	\$ 18,234	\$	1,856		
110	8,500	1,807,390	\$ 35,377	\$ (4,415)	\$ 30,962	\$ 29,109	\$	1,853		
100	4,500	642,315	\$ 26,596	\$ (6,518)	\$ 20,078	\$ 18,234	\$	1,844		
100	3,800	556,151	\$ 23,783	\$ (5,643)	\$ 18,139	\$ 16,331	\$	1,808		
100	2,200	400,000	\$ 17,844	\$ (4,059)	\$ 13,785	\$ 11,981	\$	1,804		
100	5,500	761,338	\$ 30,458	\$ (7,725)	\$ 22,733	\$ 20,953	\$	1,780		
100	2,250	410,912	\$ 18,061	\$ (4,170)	\$ 13,891	\$ 12,117	\$	1,774		
100	4,200	607,557	\$ 25,356	\$ (6,165)	\$ 19,191	\$ 17,419	\$	1,772		
110	12,300	2,253,773	\$ 46,714	\$ (5,506)	\$ 41,209	\$ 39,440	\$	1,769		
100	4,000	581,803	\$ 24,545	\$ (5,904)	\$ 18,641	\$ 16,875	\$	1,766		
100	1,900	340,003	\$ 16,378	\$ (3,450)	\$ 12,928	\$ 11,166	\$	1,763		
100	1,900	340,000	\$ 16,378	\$ (3,450)	\$ 12,928	\$ 11,166	\$	1,763		
100	5,300	733,494	\$ 29,614	\$ (7,443)	\$ 22,171	\$ 20,409	\$	1,762		
110	6,200	1,479,615	\$ 28,229	\$ (3,614)	\$ 24,615	\$ 22,856	\$	1,759		
100	4,000	680,763	\$ 25,537	\$ (6,908)	\$ 18,630	\$ 16,875	\$	1,755		
100	3,000	455,118	\$ 20,523	\$ (4,618)	\$ 15,905	\$ 14,156	\$	1,749		
100	4,500	645,279	\$ 26,530	\$ (6,548)	\$ 19,983	\$ 18,234	\$	1,748		
100	1,900	343,000	\$ 16,382	\$ (3,480)	\$ 12,901	\$ 11,166	\$	1,736		
100	4,000	632,326	\$ 25,024	\$ (6,416)	\$ 18,607	\$ 16,875	\$	1,733		
100	2,570	466,715	\$ 19,447	\$ (4,736)	\$ 14,711	\$ 12,987	\$	1,724		
100	7,500	989,669	\$ 38,152	\$ (10,042)	\$ 28,110	\$ 26,390	\$	1,720		
100	6,100	830,921	\$ 32,734	\$ (8,431)	\$ 24,303	\$ 22,584	\$	1,719		
110	8,331	1,732,105	\$ 34,598	\$ (4,231)	\$ 30,367	\$ 28,650	\$	1,717		
100	4,020	584,635	\$ 24,576	\$ (5,932)	\$ 18,643	\$ 16,929	\$	1,714		
100	3,600	525,253	\$ 22,822	\$ (5,330)	\$ 17,492	\$ 15,787	\$	1,705		
100	2,500	401,232	\$ 18,571	\$ (4,071)	\$ 14,499	\$ 12,797	\$	1,702		
110	9,000	1,810,779	\$ 36,594	\$ (4,423)	\$ 32,171	\$ 30,469	\$	1,702		
100	5,700	786,664	\$ 31,180	\$ (7,982)	\$ 23,198	\$ 21,497	\$	1,701		

Rate Class	Contract Demand	Annual Volume m3	Adjustments including DSM, less Storage and Distribution			Adjusted Bundled Distribution Revenue (\$)	Rate 300 Distribution Revenue (\$)	Rate 125 Distribution Revenue (\$)	Bundled Rate vs Rate 300	Bundled Rate vs Rate 125
			Bundled Distribution Revenue (\$)	Commodity	Distribution					
100	4,500	633,355	\$ 26,358	\$ (6,427)	\$ 19,931	\$ 18,234	\$	\$ 1,697		
110	7,800	1,655,258	\$ 32,942	\$ (4,044)	\$ 28,898	\$ 27,206	\$	\$ 1,692		
100	3,000	493,670	\$ 20,854	\$ (5,009)	\$ 15,845	\$ 14,156	\$	\$ 1,689		
100	6,652	908,520	\$ 34,986	\$ (9,219)	\$ 25,768	\$ 24,085	\$	\$ 1,683		
110	10,000	1,928,809	\$ 39,580	\$ (4,712)	\$ 34,869	\$ 33,187	\$	\$ 1,681		
110	7,700	1,637,703	\$ 32,614	\$ (4,001)	\$ 28,614	\$ 26,934	\$	\$ 1,680		
100	3,500	512,087	\$ 22,390	\$ (5,196)	\$ 17,194	\$ 15,516	\$	\$ 1,679		
100	4,500	636,652	\$ 26,371	\$ (6,460)	\$ 19,911	\$ 18,234	\$	\$ 1,677		
100	2,500	407,207	\$ 18,598	\$ (4,132)	\$ 14,466	\$ 12,797	\$	\$ 1,669		
110	9,500	1,858,937	\$ 38,033	\$ (4,541)	\$ 33,492	\$ 31,828	\$	\$ 1,664		
110	5,000	1,287,614	\$ 24,396	\$ (3,145)	\$ 21,250	\$ 19,594	\$	\$ 1,657		
100	2,100	380,000	\$ 17,221	\$ (3,856)	\$ 13,365	\$ 11,709	\$	\$ 1,656		
100	4,000	554,225	\$ 24,149	\$ (5,624)	\$ 18,525	\$ 16,875	\$	\$ 1,650		
110	9,000	1,789,134	\$ 36,487	\$ (4,371)	\$ 32,116	\$ 30,469	\$	\$ 1,647		
110	9,300	1,824,307	\$ 37,381	\$ (4,456)	\$ 32,925	\$ 31,284	\$	\$ 1,641		
110	9,000	1,786,090	\$ 36,472	\$ (4,363)	\$ 32,108	\$ 30,469	\$	\$ 1,640		
110	9,400	1,836,427	\$ 37,682	\$ (4,486)	\$ 33,195	\$ 31,556	\$	\$ 1,639		
100	2,400	403,103	\$ 18,250	\$ (4,090)	\$ 14,160	\$ 12,525	\$	\$ 1,635		
100	2,800	433,681	\$ 19,646	\$ (4,401)	\$ 15,245	\$ 13,612	\$	\$ 1,633		
100	3,000	465,760	\$ 20,509	\$ (4,726)	\$ 15,782	\$ 14,156	\$	\$ 1,626		
100	2,500	395,377	\$ 18,431	\$ (4,012)	\$ 14,419	\$ 12,797	\$	\$ 1,622		
100	2,720	424,029	\$ 19,320	\$ (4,303)	\$ 15,017	\$ 13,395	\$	\$ 1,622		
100	4,200	603,252	\$ 25,160	\$ (6,121)	\$ 19,039	\$ 17,419	\$	\$ 1,620		
110	5,800	1,368,491	\$ 26,717	\$ (3,343)	\$ 23,374	\$ 21,769	\$	\$ 1,606		
100	7,500	1,020,159	\$ 38,336	\$ (10,352)	\$ 27,984	\$ 26,390	\$	\$ 1,594		
100	1,900	345,000	\$ 16,260	\$ (3,501)	\$ 12,759	\$ 11,166	\$	\$ 1,593		
110	8,250	1,669,947	\$ 34,095	\$ (4,079)	\$ 30,015	\$ 28,430	\$	\$ 1,586		
110	6,000	1,385,132	\$ 27,280	\$ (3,384)	\$ 23,896	\$ 22,312	\$	\$ 1,584		
100	6,000	810,405	\$ 32,110	\$ (8,223)	\$ 23,887	\$ 22,312	\$	\$ 1,575		
100	3,400	490,879	\$ 21,796	\$ (4,981)	\$ 16,815	\$ 15,244	\$	\$ 1,572		
110	9,400	1,808,066	\$ 37,541	\$ (4,417)	\$ 33,124	\$ 31,556	\$	\$ 1,568		
100	3,700	552,426	\$ 23,230	\$ (5,605)	\$ 17,624	\$ 16,059	\$	\$ 1,565		
100	2,720	427,035	\$ 19,293	\$ (4,333)	\$ 14,959	\$ 13,395	\$	\$ 1,565		
100	9,000	1,219,690	\$ 44,409	\$ (12,376)	\$ 32,033	\$ 30,469	\$	\$ 1,564		
100	6,000	814,900	\$ 32,141	\$ (8,269)	\$ 23,872	\$ 22,312	\$	\$ 1,560		
100	4,000	573,271	\$ 24,249	\$ (5,817)	\$ 18,432	\$ 16,875	\$	\$ 1,557		
100	4,300	649,191	\$ 25,834	\$ (6,587)	\$ 19,247	\$ 17,691	\$	\$ 1,557		
100	2,000	357,502	\$ 16,610	\$ (3,628)	\$ 12,982	\$ 11,437	\$	\$ 1,545		
110	9,500	1,810,532	\$ 37,793	\$ (4,423)	\$ 33,370	\$ 31,828	\$	\$ 1,542		
100	2,500	445,014	\$ 18,846	\$ (4,516)	\$ 14,330	\$ 12,797	\$	\$ 1,533		
110	8,200	1,639,910	\$ 33,825	\$ (4,006)	\$ 29,819	\$ 28,294	\$	\$ 1,526		
110	5,900	1,348,663	\$ 26,859	\$ (3,295)	\$ 23,564	\$ 22,041	\$	\$ 1,524		
100	2,300	370,389	\$ 17,531	\$ (3,758)	\$ 13,773	\$ 12,253	\$	\$ 1,519		
100	13,000	1,679,849	\$ 59,904	\$ (17,045)	\$ 42,859	\$ 41,343	\$	\$ 1,515		
100	4,300	605,892	\$ 25,342	\$ (6,148)	\$ 19,194	\$ 17,691	\$	\$ 1,503		
110	8,000	1,603,741	\$ 33,166	\$ (3,918)	\$ 29,248	\$ 27,750	\$	\$ 1,498		
100	2,000	345,756	\$ 16,436	\$ (3,508)	\$ 12,927	\$ 11,437	\$	\$ 1,490		
100	2,500	413,822	\$ 18,483	\$ (4,199)	\$ 14,284	\$ 12,797	\$	\$ 1,488		
110	8,501	1,662,515	\$ 34,660	\$ (4,061)	\$ 30,599	\$ 29,112	\$	\$ 1,487		
100	3,000	459,313	\$ 20,298	\$ (4,661)	\$ 15,637	\$ 14,156	\$	\$ 1,481		
100	5,200	706,940	\$ 28,791	\$ (7,173)	\$ 21,618	\$ 20,137	\$	\$ 1,480		
100	5,500	778,004	\$ 30,323	\$ (7,894)	\$ 22,429	\$ 20,953	\$	\$ 1,476		
110	9,500	1,783,944	\$ 37,661	\$ (4,358)	\$ 33,303	\$ 31,828	\$	\$ 1,475		
110	8,000	1,593,183	\$ 33,113	\$ (3,892)	\$ 29,221	\$ 27,750	\$	\$ 1,472		
100	2,200	381,100	\$ 17,313	\$ (3,867)	\$ 13,446	\$ 11,981	\$	\$ 1,464		
100	6,900	913,444	\$ 35,491	\$ (9,269)	\$ 26,222	\$ 24,759	\$	\$ 1,463		
100	5,000	670,986	\$ 27,845	\$ (6,808)	\$ 21,037	\$ 19,594	\$	\$ 1,443		
110	3,500	1,010,000	\$ 19,417	\$ (2,467)	\$ 16,949	\$ 15,516	\$	\$ 1,434		
100	2,000	360,000	\$ 16,511	\$ (3,653)	\$ 12,858	\$ 11,437	\$	\$ 1,421		
100	6,200	828,521	\$ 32,680	\$ (8,407)	\$ 24,273	\$ 22,856	\$	\$ 1,417		
110	6,000	1,318,987	\$ 26,951	\$ (3,222)	\$ 23,729	\$ 22,312	\$	\$ 1,417		
100	2,250	409,700	\$ 17,681	\$ (4,157)	\$ 13,524	\$ 12,117	\$	\$ 1,407		
110	5,600	1,263,695	\$ 25,717	\$ (3,087)	\$ 22,630	\$ 21,225	\$	\$ 1,405		
100	3,100	462,575	\$ 20,524	\$ (4,694)	\$ 15,830	\$ 14,428	\$	\$ 1,402		
100	3,500	510,214	\$ 22,094	\$ (5,177)	\$ 16,917	\$ 15,516	\$	\$ 1,401		
110	5,500	1,249,121	\$ 25,404	\$ (3,051)	\$ 22,353	\$ 20,953	\$	\$ 1,400		
100	1,900	340,046	\$ 16,014	\$ (3,450)	\$ 12,563	\$ 11,166	\$	\$ 1,398		
100	4,800	709,247	\$ 27,639	\$ (7,197)	\$ 20,442	\$ 19,050	\$	\$ 1,392		
110	3,400	980,000	\$ 19,028	\$ (2,394)	\$ 16,634	\$ 15,244	\$	\$ 1,390		
100	6,000	820,803	\$ 32,027	\$ (8,329)	\$ 23,699	\$ 22,312	\$	\$ 1,386		
100	5,000	700,000	\$ 28,083	\$ (7,103)	\$ 20,980	\$ 19,594	\$	\$ 1,386		
100	5,500	742,972	\$ 29,877	\$ (7,539)	\$ 22,338	\$ 20,953	\$	\$ 1,385		
100	3,200	472,756	\$ 20,881	\$ (4,797)	\$ 16,084	\$ 14,700	\$	\$ 1,384		
100	6,700	913,153	\$ 34,862	\$ (9,266)	\$ 25,596	\$ 24,215	\$	\$ 1,381		
100	3,399	492,473	\$ 21,616	\$ (4,997)	\$ 16,619	\$ 15,241	\$	\$ 1,378		
110	9,400	1,732,621	\$ 37,166	\$ (4,233)	\$ 32,933	\$ 31,556	\$	\$ 1,377		
110	8,000	1,554,946	\$ 32,923	\$ (3,798)	\$ 29,125	\$ 27,750	\$	\$ 1,375		
100	5,700	756,481	\$ 30,547	\$ (7,676)	\$ 22,871	\$ 21,497	\$	\$ 1,375		
100	3,200	483,762	\$ 20,980	\$ (4,909)	\$ 16,071	\$ 14,700	\$	\$ 1,371		
110	7,600	1,502,846	\$ 31,705	\$ (3,671)	\$ 28,033	\$ 26,662	\$	\$ 1,371		
100	6,000	794,527	\$ 31,742	\$ (8,062)	\$ 23,680	\$ 22,312	\$	\$ 1,368		
100	3,500	486,198	\$ 21,816	\$ (4,933)	\$ 16,883	\$ 15,516	\$	\$ 1,367		
100	5,000	664,310	\$ 27,698	\$ (6,741)	\$ 20,957	\$ 19,594	\$	\$ 1,363		
110	5,400	1,218,334	\$ 25,011	\$ (2,976)	\$ 22,035	\$ 20,681	\$	\$ 1,354		
100	4,250	600,878	\$ 25,001	\$ (6,097)	\$ 18,904	\$ 17,555	\$	\$ 1,350		
100	3,100	454,000	\$ 20,383	\$ (4,607)	\$ 15,777	\$ 14,428	\$	\$ 1,349		
110	9,480	1,730,897	\$ 37,349	\$ (4,228)	\$ 33,121	\$ 31,774	\$	\$ 1,348		
100	3,000	460,131	\$ 20,164	\$ (4,669)	\$ 15,495	\$ 14,156	\$	\$ 1,339		
100	2,600	401,660	\$ 18,482	\$ (4,076)	\$ 14,407	\$ 13,069	\$	\$ 1,338		
110	4,300	1,071,505	\$ 21,642	\$ (2,618)	\$ 19,025	\$ 17,691	\$	\$ 1,334		
110	3,300	944,115	\$ 18,609	\$ (2,306)	\$ 16,303	\$ 14,972	\$	\$ 1,331		
100	3,400	491,163	\$ 21,553	\$ (4,984)	\$ 16,569	\$ 15,244	\$	\$ 1,325		
110	5,400	1,205,269	\$ 24,947	\$ (2,944)	\$ 22,002	\$ 20,681	\$	\$ 1,321		
100	4,000	541,587	\$ 23,690	\$ (5,495)	\$ 18,195	\$ 16,875	\$	\$ 1,320		

Rate Class	Contract Demand	Annual Volume m3	Adjustments including DSM, less Storage and Distribution			Adjusted Bundled Distribution Revenue (\$)	Rate 300 Distribution Revenue (\$)	Rate 125 Distribution Revenue (\$)	Bundled Rate vs Rate 300	Bundled Rate vs Rate 125
			Bundled Distribution Revenue (\$)	Commodity	Distribution					
110	3,200	925,122	\$ 18,275	\$ (2,260)	\$ 16,015	\$ 14,700	\$	\$ 1,315		
100	9,620	1,240,382	\$ 46,055	\$ (12,586)	\$ 33,469	\$ 32,154	\$	\$ 1,315		
110	6,450	1,333,348	\$ 28,103	\$ (3,257)	\$ 24,846	\$ 23,536	\$	\$ 1,310		
100	3,000	460,723	\$ 20,135	\$ (4,675)	\$ 15,460	\$ 14,156	\$	\$ 1,304		
100	3,600	530,174	\$ 22,465	\$ (5,380)	\$ 17,086	\$ 15,787	\$	\$ 1,298		
110	9,100	1,662,999	\$ 36,100	\$ (4,062)	\$ 32,038	\$ 30,740	\$	\$ 1,297		
110	9,100	1,662,941	\$ 36,100	\$ (4,062)	\$ 32,038	\$ 30,740	\$	\$ 1,297		
100	4,100	586,152	\$ 24,389	\$ (5,948)	\$ 18,442	\$ 17,147	\$	\$ 1,295		
110	3,500	954,560	\$ 19,141	\$ (2,332)	\$ 16,809	\$ 15,516	\$	\$ 1,294		
110	6,200	1,294,106	\$ 27,308	\$ (3,161)	\$ 24,147	\$ 22,856	\$	\$ 1,290		
110	4,600	1,091,773	\$ 22,463	\$ (2,667)	\$ 19,796	\$ 18,506	\$	\$ 1,290		
100	3,300	480,167	\$ 21,132	\$ (4,872)	\$ 16,260	\$ 14,972	\$	\$ 1,288		
100	1,900	340,000	\$ 15,900	\$ (3,450)	\$ 12,450	\$ 11,166	\$	\$ 1,285		
100	2,763	417,382	\$ 19,031	\$ (4,235)	\$ 14,796	\$ 13,512	\$	\$ 1,284		
110	3,100	900,000	\$ 17,910	\$ (2,199)	\$ 15,712	\$ 14,428	\$	\$ 1,284		
100	6,500	864,862	\$ 33,728	\$ (8,776)	\$ 24,952	\$ 23,672	\$	\$ 1,280		
100	6,000	784,565	\$ 31,549	\$ (7,961)	\$ 23,588	\$ 22,312	\$	\$ 1,276		
100	6,800	894,801	\$ 34,840	\$ (9,080)	\$ 25,760	\$ 24,487	\$	\$ 1,273		
100	4,530	625,772	\$ 25,933	\$ (6,350)	\$ 19,583	\$ 18,316	\$	\$ 1,267		
110	8,800	1,611,427	\$ 35,124	\$ (3,936)	\$ 31,188	\$ 29,925	\$	\$ 1,263		
110	6,900	1,368,977	\$ 29,360	\$ (3,344)	\$ 26,016	\$ 24,759	\$	\$ 1,256		
100	3,900	548,890	\$ 23,427	\$ (5,570)	\$ 17,857	\$ 16,603	\$	\$ 1,254		
110	4,475	1,061,021	\$ 22,010	\$ (2,592)	\$ 19,418	\$ 18,166	\$	\$ 1,252		
110	6,500	1,316,312	\$ 28,138	\$ (3,216)	\$ 24,923	\$ 23,672	\$	\$ 1,251		
110	8,100	1,517,137	\$ 32,976	\$ (3,706)	\$ 29,270	\$ 28,022	\$	\$ 1,248		
110	8,100	1,516,564	\$ 32,973	\$ (3,705)	\$ 29,268	\$ 28,022	\$	\$ 1,246		
100	2,500	382,897	\$ 17,928	\$ (3,885)	\$ 14,043	\$ 12,797	\$	\$ 1,246		
100	1,900	340,000	\$ 15,861	\$ (3,450)	\$ 12,411	\$ 11,166	\$	\$ 1,245		
110	8,500	1,566,181	\$ 34,179	\$ (3,826)	\$ 30,353	\$ 29,109	\$	\$ 1,244		
110	5,500	1,185,528	\$ 25,089	\$ (2,896)	\$ 22,192	\$ 20,953	\$	\$ 1,239		
100	4,900	684,722	\$ 27,509	\$ (6,948)	\$ 20,561	\$ 19,322	\$	\$ 1,239		
110	5,500	1,184,318	\$ 25,083	\$ (2,893)	\$ 22,189	\$ 20,953	\$	\$ 1,236		
110	6,700	1,330,947	\$ 28,691	\$ (3,251)	\$ 25,440	\$ 24,215	\$	\$ 1,224		
100	2,000	356,681	\$ 16,275	\$ (3,619)	\$ 12,656	\$ 11,437	\$	\$ 1,218		
110	7,200	1,390,495	\$ 30,187	\$ (3,397)	\$ 26,790	\$ 25,575	\$	\$ 1,215		
100	21,000	2,668,515	\$ 91,381	\$ (27,077)	\$ 64,304	\$ 63,093	\$	\$ 1,210		
110	8,200	1,514,473	\$ 33,202	\$ (3,700)	\$ 29,503	\$ 28,294	\$	\$ 1,209		
100	2,000	358,000	\$ 16,278	\$ (3,633)	\$ 12,645	\$ 11,437	\$	\$ 1,208		
110	2,900	844,095	\$ 17,153	\$ (2,062)	\$ 15,091	\$ 13,884	\$	\$ 1,206		
100	4,000	556,137	\$ 23,721	\$ (5,643)	\$ 18,078	\$ 16,875	\$	\$ 1,203		
100	2,000	346,113	\$ 16,148	\$ (3,512)	\$ 12,636	\$ 11,437	\$	\$ 1,199		
100	3,400	534,002	\$ 21,855	\$ (5,419)	\$ 16,437	\$ 15,244	\$	\$ 1,193		
110	8,000	1,481,736	\$ 32,560	\$ (3,620)	\$ 28,940	\$ 27,750	\$	\$ 1,190		
110	7,000	1,353,751	\$ 29,524	\$ (3,307)	\$ 26,217	\$ 25,031	\$	\$ 1,186		
110	8,088	1,489,320	\$ 32,809	\$ (3,638)	\$ 29,170	\$ 27,989	\$	\$ 1,181		
110	6,300	1,261,296	\$ 27,385	\$ (3,081)	\$ 24,304	\$ 23,128	\$	\$ 1,176		
110	5,500	1,158,859	\$ 24,956	\$ (2,831)	\$ 22,125	\$ 20,953	\$	\$ 1,172		
100	3,000	446,607	\$ 19,858	\$ (4,532)	\$ 15,326	\$ 14,156	\$	\$ 1,170		
115	2,200	803,000	\$ 13,439	\$ (291)	\$ 13,148	\$ 11,981	\$	\$ 1,167		
100	1,900	340,000	\$ 15,779	\$ (3,450)	\$ 12,329	\$ 11,166	\$	\$ 1,163		
100	2,500	398,238	\$ 17,996	\$ (4,041)	\$ 13,955	\$ 12,797	\$	\$ 1,158		
110	7,900	1,455,842	\$ 32,191	\$ (3,556)	\$ 28,635	\$ 27,478	\$	\$ 1,157		
100	4,000	548,839	\$ 23,601	\$ (5,569)	\$ 18,032	\$ 16,875	\$	\$ 1,157		
110	7,900	1,453,776	\$ 32,181	\$ (3,551)	\$ 28,630	\$ 27,478	\$	\$ 1,152		
110	4,700	1,049,461	\$ 22,493	\$ (2,564)	\$ 19,929	\$ 18,778	\$	\$ 1,151		
110	8,000	1,463,996	\$ 32,472	\$ (3,576)	\$ 28,895	\$ 27,750	\$	\$ 1,146		
110	7,800	1,438,068	\$ 31,863	\$ (3,513)	\$ 28,350	\$ 27,206	\$	\$ 1,144		
100	5,800	761,042	\$ 30,635	\$ (7,722)	\$ 22,912	\$ 21,769	\$	\$ 1,144		
100	7,000	895,402	\$ 35,255	\$ (9,086)	\$ 26,169	\$ 25,031	\$	\$ 1,138		
100	2,500	399,895	\$ 17,988	\$ (4,058)	\$ 13,930	\$ 12,797	\$	\$ 1,134		
110	5,700	1,168,483	\$ 25,484	\$ (2,854)	\$ 22,629	\$ 21,497	\$	\$ 1,133		
110	7,500	1,393,600	\$ 30,922	\$ (3,404)	\$ 27,518	\$ 26,390	\$	\$ 1,127		
110	7,900	1,442,315	\$ 32,124	\$ (3,523)	\$ 28,601	\$ 27,478	\$	\$ 1,123		
100	3,200	467,487	\$ 20,566	\$ (4,744)	\$ 15,822	\$ 14,700	\$	\$ 1,122		
100	2,500	375,481	\$ 17,723	\$ (3,810)	\$ 13,913	\$ 12,797	\$	\$ 1,116		
110	6,000	1,199,173	\$ 26,356	\$ (2,929)	\$ 23,427	\$ 22,312	\$	\$ 1,115		
115	2,800	862,510	\$ 15,039	\$ (313)	\$ 14,726	\$ 13,612	\$	\$ 1,114		
110	3,409	870,850	\$ 18,507	\$ (2,127)	\$ 16,380	\$ 15,268	\$	\$ 1,112		
100	4,800	653,333	\$ 26,788	\$ (6,629)	\$ 20,158	\$ 19,050	\$	\$ 1,108		
110	7,700	1,410,565	\$ 31,486	\$ (3,446)	\$ 28,040	\$ 26,934	\$	\$ 1,106		
100	2,500	388,738	\$ 17,846	\$ (3,945)	\$ 13,902	\$ 12,797	\$	\$ 1,105		
100	4,200	573,452	\$ 24,341	\$ (5,819)	\$ 18,522	\$ 17,419	\$	\$ 1,103		
110	7,730	1,412,155	\$ 31,566	\$ (3,450)	\$ 28,117	\$ 27,016	\$	\$ 1,101		
110	6,000	1,193,208	\$ 26,327	\$ (2,915)	\$ 23,412	\$ 22,312	\$	\$ 1,099		
100	3,000	459,732	\$ 19,912	\$ (4,665)	\$ 15,247	\$ 14,156	\$	\$ 1,091		
110	2,610	761,700	\$ 16,047	\$ (1,861)	\$ 14,187	\$ 13,096	\$	\$ 1,091		
110	5,000	1,063,024	\$ 23,280	\$ (2,597)	\$ 20,683	\$ 19,594	\$	\$ 1,090		
110	7,400	1,365,579	\$ 30,543	\$ (3,336)	\$ 27,207	\$ 26,119	\$	\$ 1,088		
110	7,000	1,314,389	\$ 29,329	\$ (3,211)	\$ 26,118	\$ 25,031	\$	\$ 1,087		
100	3,000	450,557	\$ 19,812	\$ (4,572)	\$ 15,240	\$ 14,156	\$	\$ 1,084		
100	5,500	731,787	\$ 29,460	\$ (7,425)	\$ 22,035	\$ 20,953	\$	\$ 1,082		
115	2,967	866,418	\$ 15,451	\$ (314)	\$ 15,137	\$ 14,067	\$	\$ 1,070		
110	6,000	1,181,149	\$ 26,267	\$ (2,885)	\$ 23,381	\$ 22,312	\$	\$ 1,069		
100	6,000	834,359	\$ 31,847	\$ (8,466)	\$ 23,381	\$ 22,312	\$	\$ 1,069		
100	2,500	383,033	\$ 17,736	\$ (3,887)	\$ 13,849	\$ 12,797	\$	\$ 1,052		
100	6,500	845,509	\$ 33,300	\$ (8,579)	\$ 24,721	\$ 23,672	\$	\$ 1,049		
100	2,000	340,266	\$ 15,938	\$ (3,453)	\$ 12,486	\$ 11,437	\$	\$ 1,048		
100	18,000	2,258,991	\$ 78,903	\$ (22,922)	\$ 55,981	\$ 54,937	\$	\$ 1,043		
100	2,400	429,306	\$ 17,924	\$ (4,356)	\$ 13,568	\$ 12,525	\$	\$ 1,043		
100	7,500	971,874	\$ 37,291	\$ (9,862)	\$ 27,430	\$ 26,390	\$	\$ 1,039		
100	7,400	950,770	\$ 36,804	\$ (9,647)	\$ 27,156	\$ 26,119	\$	\$ 1,038		
100	3,000	421,527	\$ 19,467	\$ (4,277)	\$ 15,189	\$ 14,156	\$	\$ 1,033		
100	6,000	797,896	\$ 31,441	\$ (8,096)	\$ 23,345	\$ 22,312	\$	\$ 1,033		
100	11,000	1,380,680	\$ 50,948	\$ (14,010)	\$ 36,938	\$ 35,906	\$	\$ 1,032		

Rate Class	Contract Demand	Annual Volume m3	Adjustments including DSM, less Storage and Distribution			Adjusted Bundled Distribution Revenue (\$)	Rate 300 Distribution Revenue (\$)	Rate 125 Distribution Revenue (\$)	Bundled Rate vs Rate 300	Bundled Rate vs Rate 125
			Bundled Distribution Revenue (\$)	Commodity						
110	4,600	988,060	\$ 21,948	\$ (2,414)	\$ 19,534	\$ 18,506	\$	1,028		
100	2,830	416,095	\$ 18,944	\$ (4,222)	\$ 14,721	\$ 13,694	\$	1,027		
100	4,744	662,817	\$ 26,645	\$ (6,726)	\$ 19,919	\$ 18,898	\$	1,022		
100	4,000	535,091	\$ 23,324	\$ (5,430)	\$ 17,894	\$ 16,875	\$	1,019		
100	6,000	776,851	\$ 31,206	\$ (7,883)	\$ 23,324	\$ 22,312	\$	1,011		
115	2,400	763,294	\$ 13,812	\$ (277)	\$ 13,535	\$ 12,525	\$	1,011		
100	7,650	980,153	\$ 37,748	\$ (9,946)	\$ 27,802	\$ 26,798	\$	1,004		
100	3,700	519,004	\$ 22,321	\$ (5,266)	\$ 17,055	\$ 16,059	\$	996		
100	1,900	340,204	\$ 15,609	\$ (3,452)	\$ 12,157	\$ 11,166	\$	992		
110	5,420	1,076,944	\$ 24,357	\$ (2,631)	\$ 21,726	\$ 20,736	\$	991		
110	4,500	960,472	\$ 21,571	\$ (2,346)	\$ 19,224	\$ 18,234	\$	990		
110	5,500	1,084,947	\$ 24,589	\$ (2,650)	\$ 21,939	\$ 20,953	\$	986		
100	4,000	581,723	\$ 23,761	\$ (5,903)	\$ 17,858	\$ 16,875	\$	984		
110	5,500	1,083,976	\$ 24,584	\$ (2,648)	\$ 21,936	\$ 20,953	\$	983		
100	5,500	727,773	\$ 29,320	\$ (7,385)	\$ 21,935	\$ 20,953	\$	982		
100	3,500	490,233	\$ 21,463	\$ (4,974)	\$ 16,489	\$ 15,516	\$	974		
110	5,000	1,014,561	\$ 23,039	\$ (2,478)	\$ 20,561	\$ 19,594	\$	967		
100	3,300	496,188	\$ 20,974	\$ (5,035)	\$ 15,939	\$ 14,972	\$	967		
110	3,800	858,808	\$ 19,386	\$ (2,098)	\$ 17,288	\$ 16,331	\$	957		
100	5,100	723,705	\$ 28,163	\$ (7,343)	\$ 20,820	\$ 19,866	\$	954		
100	6,500	875,338	\$ 33,508	\$ (8,882)	\$ 24,626	\$ 23,672	\$	954		
100	3,300	465,811	\$ 20,646	\$ (4,727)	\$ 15,919	\$ 14,972	\$	948		
100	2,950	426,843	\$ 19,297	\$ (4,331)	\$ 14,966	\$ 14,020	\$	945		
100	1,900	345,000	\$ 15,603	\$ (3,501)	\$ 12,103	\$ 11,166	\$	937		
110	3,500	811,761	\$ 18,432	\$ (1,983)	\$ 16,449	\$ 15,516	\$	933		
100	4,460	591,670	\$ 25,057	\$ (6,004)	\$ 19,053	\$ 18,126	\$	927		
115	2,500	740,073	\$ 13,990	\$ (269)	\$ 13,721	\$ 12,797	\$	925		
100	8,900	1,118,491	\$ 42,469	\$ (11,349)	\$ 31,120	\$ 30,197	\$	923		
100	2,500	393,071	\$ 17,707	\$ (3,988)	\$ 13,718	\$ 12,797	\$	921		
100	4,000	544,285	\$ 23,313	\$ (5,523)	\$ 17,791	\$ 16,875	\$	916		
110	2,700	701,108	\$ 15,962	\$ (1,713)	\$ 14,250	\$ 13,341	\$	909		
110	3,800	839,692	\$ 19,291	\$ (2,051)	\$ 17,240	\$ 16,331	\$	908		
100	4,000	556,212	\$ 23,427	\$ (5,644)	\$ 17,783	\$ 16,875	\$	908		
110	5,900	1,104,507	\$ 25,646	\$ (2,698)	\$ 22,948	\$ 22,041	\$	907		
100	3,650	501,778	\$ 21,921	\$ (5,092)	\$ 16,830	\$ 15,923	\$	907		
100	6,700	874,867	\$ 33,994	\$ (8,877)	\$ 25,117	\$ 24,215	\$	902		
100	3,000	446,934	\$ 19,592	\$ (4,535)	\$ 15,057	\$ 14,156	\$	901		
100	5,000	662,586	\$ 27,216	\$ (6,723)	\$ 20,493	\$ 19,594	\$	899		
110	6,200	1,138,863	\$ 26,537	\$ (2,782)	\$ 23,755	\$ 22,856	\$	899		
110	3,200	759,992	\$ 17,455	\$ (1,857)	\$ 15,598	\$ 14,700	\$	898		
100	2,200	341,815	\$ 16,345	\$ (3,468)	\$ 12,877	\$ 11,981	\$	896		
110	3,100	745,190	\$ 17,141	\$ (1,820)	\$ 15,321	\$ 14,428	\$	893		
100	3,700	508,452	\$ 22,110	\$ (5,159)	\$ 16,951	\$ 16,059	\$	892		
110	5,000	984,600	\$ 22,891	\$ (2,405)	\$ 20,485	\$ 19,594	\$	892		
100	3,800	526,985	\$ 22,569	\$ (5,347)	\$ 17,222	\$ 16,331	\$	891		
100	2,650	403,795	\$ 18,191	\$ (4,097)	\$ 14,094	\$ 13,205	\$	889		
100	2,500	388,876	\$ 17,631	\$ (3,946)	\$ 13,685	\$ 12,797	\$	888		
100	2,500	394,152	\$ 17,683	\$ (3,999)	\$ 13,683	\$ 12,797	\$	887		
100	5,000	651,397	\$ 27,089	\$ (6,610)	\$ 20,480	\$ 19,594	\$	886		
100	4,000	546,563	\$ 23,303	\$ (5,546)	\$ 17,757	\$ 16,875	\$	882		
100	2,200	401,109	\$ 16,931	\$ (4,070)	\$ 12,861	\$ 11,981	\$	880		
100	6,600	848,633	\$ 33,432	\$ (8,611)	\$ 24,821	\$ 23,944	\$	878		
110	4,800	950,792	\$ 22,243	\$ (2,323)	\$ 19,920	\$ 19,050	\$	870		
110	5,000	975,794	\$ 22,847	\$ (2,384)	\$ 20,463	\$ 19,594	\$	869		
100	2,500	376,173	\$ 17,480	\$ (3,817)	\$ 13,663	\$ 12,797	\$	866		
110	3,300	759,323	\$ 17,692	\$ (1,855)	\$ 15,837	\$ 14,972	\$	865		
110	4,500	910,589	\$ 21,323	\$ (2,224)	\$ 19,098	\$ 18,234	\$	864		
110	4,500	909,554	\$ 21,318	\$ (2,222)	\$ 19,096	\$ 18,234	\$	862		
115	1,900	628,528	\$ 12,250	\$ (228)	\$ 12,022	\$ 11,166	\$	856		
110	3,000	715,942	\$ 16,756	\$ (1,749)	\$ 15,007	\$ 14,156	\$	851		
110	5,800	1,069,250	\$ 25,231	\$ (2,612)	\$ 22,619	\$ 21,769	\$	850		
110	5,500	1,030,178	\$ 24,317	\$ (2,517)	\$ 21,800	\$ 20,953	\$	847		
100	3,000	428,570	\$ 19,350	\$ (4,349)	\$ 15,001	\$ 14,156	\$	845		
115	1,600	577,694	\$ 11,393	\$ (210)	\$ 11,184	\$ 10,350	\$	834		
110	3,000	708,488	\$ 16,719	\$ (1,731)	\$ 14,988	\$ 14,156	\$	832		
100	3,000	427,086	\$ 19,313	\$ (4,334)	\$ 14,980	\$ 14,156	\$	823		
100	3,000	435,121	\$ 19,386	\$ (4,415)	\$ 14,971	\$ 14,156	\$	815		
110	5,600	1,029,335	\$ 24,553	\$ (2,514)	\$ 22,038	\$ 21,225	\$	813		
100	5,850	766,617	\$ 30,492	\$ (7,779)	\$ 22,713	\$ 21,905	\$	808		
100	3,200	458,754	\$ 20,163	\$ (4,655)	\$ 15,508	\$ 14,700	\$	808		
100	5,200	664,573	\$ 27,687	\$ (6,743)	\$ 20,943	\$ 20,137	\$	806		
100	3,500	489,460	\$ 21,282	\$ (4,967)	\$ 16,315	\$ 15,516	\$	800		
100	11,500	1,439,815	\$ 52,675	\$ (14,610)	\$ 38,065	\$ 37,265	\$	800		
115	2,200	642,173	\$ 13,007	\$ (233)	\$ 12,774	\$ 11,981	\$	793		
100	1,870	340,400	\$ 15,316	\$ (3,454)	\$ 11,862	\$ 11,084	\$	778		
100	2,500	389,079	\$ 17,519	\$ (3,948)	\$ 13,571	\$ 12,797	\$	774		
100	3,000	418,739	\$ 19,172	\$ (4,249)	\$ 14,923	\$ 14,156	\$	767		
100	4,429	583,814	\$ 24,726	\$ (5,924)	\$ 18,802	\$ 18,041	\$	761		
110	3,000	679,807	\$ 16,577	\$ (1,661)	\$ 14,916	\$ 14,156	\$	760		
100	3,500	515,966	\$ 21,506	\$ (5,236)	\$ 16,271	\$ 15,516	\$	755		
100	3,000	435,628	\$ 19,328	\$ (4,420)	\$ 14,908	\$ 14,156	\$	751		
110	2,600	623,689	\$ 15,338	\$ (1,524)	\$ 13,814	\$ 13,069	\$	746		
100	2,500	382,403	\$ 17,420	\$ (3,880)	\$ 13,540	\$ 12,797	\$	743		
110	3,200	696,976	\$ 17,142	\$ (1,703)	\$ 15,439	\$ 14,700	\$	739		
110	3,000	671,470	\$ 16,535	\$ (1,640)	\$ 14,895	\$ 14,156	\$	739		
100	6,450	829,926	\$ 32,691	\$ (8,421)	\$ 24,269	\$ 23,536	\$	733		
100	4,000	538,446	\$ 23,068	\$ (5,464)	\$ 17,605	\$ 16,875	\$	730		
100	4,900	639,796	\$ 26,543	\$ (6,492)	\$ 20,051	\$ 19,322	\$	729		
110	4,200	818,926	\$ 20,148	\$ (2,001)	\$ 18,147	\$ 17,419	\$	728		
100	5,000	655,281	\$ 26,964	\$ (6,649)	\$ 20,315	\$ 19,594	\$	721		
100	2,500	383,781	\$ 17,409	\$ (3,894)	\$ 13,515	\$ 12,797	\$	718		
110	3,900	771,194	\$ 19,191	\$ (1,884)	\$ 17,307	\$ 16,603	\$	704		
100	13,700	1,708,403	\$ 61,285	\$ (17,335)	\$ 43,950	\$ 43,247	\$	703		
100	4,700	623,179	\$ 25,801	\$ (6,323)	\$ 19,477	\$ 18,778	\$	699		

Rate Class	Contract Demand	Annual Volume m3	Adjustments including DSM, less Storage and Distribution			Adjusted Bundled Distribution Revenue (\$)	Rate 300 Distribution Revenue (\$)	Rate 125 Distribution Revenue (\$)	Bundled Rate vs Bundled Rate vs	
			Bundled Distribution Revenue (\$)	Commodity	Distribution				Rate 300	Rate 125
110	3,350	698,014	\$ 17,507	\$ (1,705)	\$ 15,802	\$ 15,108	\$	\$	694	
110	3,700	740,591	\$ 18,559	\$ (1,809)	\$ 16,749	\$ 16,059	\$	\$	690	
110	2,500	588,703	\$ 14,924	\$ (1,438)	\$ 13,486	\$ 12,797	\$	\$	689	
110	2,700	613,128	\$ 15,525	\$ (1,498)	\$ 14,028	\$ 13,341	\$	\$	687	
110	2,900	638,059	\$ 16,129	\$ (1,559)	\$ 14,571	\$ 13,884	\$	\$	686	
110	3,200	674,755	\$ 17,032	\$ (1,648)	\$ 15,383	\$ 14,700	\$	\$	683	
110	3,900	761,739	\$ 19,144	\$ (1,861)	\$ 17,283	\$ 16,603	\$	\$	680	
100	2,300	344,433	\$ 16,428	\$ (3,495)	\$ 12,933	\$ 12,253	\$	\$	680	
100	2,300	419,300	\$ 17,187	\$ (4,255)	\$ 12,932	\$ 12,253	\$	\$	679	
100	3,100	659,822	\$ 16,717	\$ (1,612)	\$ 15,105	\$ 14,428	\$	\$	677	
100	5,000	653,477	\$ 26,900	\$ (6,631)	\$ 20,269	\$ 19,594	\$	\$	675	
110	3,250	677,875	\$ 17,167	\$ (1,656)	\$ 15,511	\$ 14,836	\$	\$	675	
110	2,900	632,943	\$ 16,104	\$ (1,546)	\$ 14,558	\$ 13,884	\$	\$	673	
110	4,730	863,508	\$ 21,641	\$ (2,109)	\$ 19,532	\$ 18,860	\$	\$	672	
100	4,400	578,753	\$ 24,504	\$ (5,873)	\$ 18,631	\$ 17,962	\$	\$	669	
110	2,500	577,469	\$ 14,868	\$ (1,411)	\$ 13,458	\$ 12,797	\$	\$	661	
110	3,800	741,501	\$ 18,803	\$ (1,811)	\$ 16,992	\$ 16,331	\$	\$	660	
110	3,300	675,663	\$ 17,276	\$ (1,651)	\$ 15,625	\$ 14,972	\$	\$	654	
110	2,850	617,488	\$ 15,907	\$ (1,508)	\$ 14,399	\$ 13,748	\$	\$	650	
110	2,500	571,719	\$ 14,840	\$ (1,397)	\$ 13,443	\$ 12,797	\$	\$	646	
110	3,500	697,275	\$ 17,863	\$ (1,703)	\$ 16,160	\$ 15,516	\$	\$	644	
100	3,200	437,387	\$ 19,780	\$ (4,438)	\$ 15,341	\$ 14,700	\$	\$	641	
100	4,500	590,059	\$ 24,863	\$ (5,987)	\$ 18,875	\$ 18,234	\$	\$	641	
115	1,200	439,228	\$ 10,061	\$ (159)	\$ 9,902	\$ 9,262	\$	\$	639	
110	4,300	795,980	\$ 20,274	\$ (1,944)	\$ 18,329	\$ 17,691	\$	\$	639	
110	4,000	756,497	\$ 19,358	\$ (1,848)	\$ 17,510	\$ 16,875	\$	\$	635	
100	3,000	424,241	\$ 19,087	\$ (4,305)	\$ 14,782	\$ 14,156	\$	\$	626	
110	3,600	699,932	\$ 18,117	\$ (1,710)	\$ 16,407	\$ 15,787	\$	\$	619	
110	4,320	789,534	\$ 20,290	\$ (1,929)	\$ 18,361	\$ 17,745	\$	\$	616	
110	4,200	773,985	\$ 19,924	\$ (1,891)	\$ 18,034	\$ 17,419	\$	\$	615	
100	1,950	352,020	\$ 15,482	\$ (3,572)	\$ 11,910	\$ 11,302	\$	\$	609	
110	3,300	656,427	\$ 17,180	\$ (1,604)	\$ 15,577	\$ 14,972	\$	\$	605	
100	4,000	528,058	\$ 22,838	\$ (5,358)	\$ 17,480	\$ 16,875	\$	\$	605	
110	3,250	648,440	\$ 17,021	\$ (1,584)	\$ 15,437	\$ 14,836	\$	\$	601	
110	2,300	527,207	\$ 14,139	\$ (1,288)	\$ 12,851	\$ 12,253	\$	\$	598	
100	3,500	461,659	\$ 20,796	\$ (4,684)	\$ 16,111	\$ 15,516	\$	\$	596	
110	4,000	740,793	\$ 19,280	\$ (1,810)	\$ 17,470	\$ 16,875	\$	\$	595	
110	3,000	613,790	\$ 16,249	\$ (1,499)	\$ 14,749	\$ 14,156	\$	\$	593	
100	9,003	1,116,172	\$ 42,394	\$ (11,326)	\$ 31,068	\$ 30,477	\$	\$	592	
100	5,250	682,543	\$ 27,790	\$ (6,926)	\$ 20,865	\$ 20,273	\$	\$	591	
110	1,420	412,802	\$ 11,458	\$ (1,008)	\$ 10,450	\$ 9,861	\$	\$	589	
110	3,000	611,921	\$ 16,239	\$ (1,495)	\$ 14,745	\$ 14,156	\$	\$	588	
100	5,000	670,405	\$ 26,984	\$ (6,803)	\$ 20,182	\$ 19,594	\$	\$	588	
100	2,150	388,100	\$ 16,371	\$ (3,938)	\$ 12,433	\$ 11,845	\$	\$	588	
100	5,900	760,826	\$ 30,345	\$ (7,720)	\$ 22,625	\$ 22,041	\$	\$	585	
110	4,000	736,286	\$ 19,257	\$ (1,799)	\$ 17,459	\$ 16,875	\$	\$	584	
100	4,500	588,371	\$ 24,780	\$ (5,970)	\$ 18,810	\$ 18,234	\$	\$	576	
100	3,500	466,941	\$ 20,830	\$ (4,738)	\$ 16,092	\$ 15,516	\$	\$	576	
100	3,000	433,602	\$ 19,132	\$ (4,400)	\$ 14,732	\$ 14,156	\$	\$	576	
100	5,856	766,045	\$ 30,265	\$ (7,773)	\$ 22,492	\$ 21,921	\$	\$	571	
100	6,000	767,025	\$ 30,664	\$ (7,783)	\$ 22,881	\$ 22,312	\$	\$	569	
110	2,000	477,165	\$ 13,170	\$ (1,166)	\$ 12,004	\$ 11,437	\$	\$	567	
110	2,700	562,633	\$ 15,275	\$ (1,374)	\$ 13,900	\$ 13,341	\$	\$	560	
110	1,340	390,000	\$ 11,153	\$ (953)	\$ 10,200	\$ 9,643	\$	\$	557	
110	3,700	687,866	\$ 18,297	\$ (1,680)	\$ 16,616	\$ 16,059	\$	\$	557	
100	4,000	531,477	\$ 22,824	\$ (5,393)	\$ 17,431	\$ 16,875	\$	\$	557	
100	4,000	530,577	\$ 22,811	\$ (5,384)	\$ 17,428	\$ 16,875	\$	\$	553	
110	3,200	622,544	\$ 16,772	\$ (1,521)	\$ 15,251	\$ 14,700	\$	\$	551	
100	3,500	476,388	\$ 20,898	\$ (4,834)	\$ 16,064	\$ 15,516	\$	\$	549	
110	3,000	595,024	\$ 16,155	\$ (1,454)	\$ 14,702	\$ 14,156	\$	\$	546	
100	2,600	381,891	\$ 17,488	\$ (3,875)	\$ 13,613	\$ 13,069	\$	\$	544	
110	3,500	657,233	\$ 17,664	\$ (1,606)	\$ 16,059	\$ 15,516	\$	\$	543	
110	2,700	555,544	\$ 15,239	\$ (1,357)	\$ 13,882	\$ 13,341	\$	\$	542	
110	3,700	681,667	\$ 18,266	\$ (1,665)	\$ 16,601	\$ 16,059	\$	\$	541	
100	6,600	840,000	\$ 33,005	\$ (8,523)	\$ 24,482	\$ 23,944	\$	\$	538	
110	2,200	490,807	\$ 13,718	\$ (1,199)	\$ 12,519	\$ 11,981	\$	\$	538	
110	2,800	565,076	\$ 15,527	\$ (1,380)	\$ 14,146	\$ 13,612	\$	\$	534	
110	2,500	527,138	\$ 14,618	\$ (1,288)	\$ 13,331	\$ 12,797	\$	\$	534	
110	2,700	552,202	\$ 15,223	\$ (1,349)	\$ 13,874	\$ 13,341	\$	\$	533	
110	3,500	653,071	\$ 17,644	\$ (1,595)	\$ 16,048	\$ 15,516	\$	\$	533	
110	3,600	665,250	\$ 17,944	\$ (1,625)	\$ 16,319	\$ 15,787	\$	\$	532	
110	2,200	486,893	\$ 13,698	\$ (1,189)	\$ 12,509	\$ 11,981	\$	\$	528	
100	4,000	524,755	\$ 22,723	\$ (5,325)	\$ 17,399	\$ 16,875	\$	\$	524	
100	3,231	456,834	\$ 19,941	\$ (4,635)	\$ 15,305	\$ 14,784	\$	\$	521	
100	3,000	432,113	\$ 19,052	\$ (4,385)	\$ 14,667	\$ 14,156	\$	\$	511	
100	4,500	579,706	\$ 24,626	\$ (5,882)	\$ 18,744	\$ 18,234	\$	\$	510	
100	2,200	342,334	\$ 15,963	\$ (3,474)	\$ 12,490	\$ 11,981	\$	\$	509	
100	4,200	565,382	\$ 23,660	\$ (5,737)	\$ 17,923	\$ 17,419	\$	\$	504	
110	2,300	488,699	\$ 13,947	\$ (1,194)	\$ 12,754	\$ 12,253	\$	\$	500	
100	3,000	406,137	\$ 18,775	\$ (4,121)	\$ 14,654	\$ 14,156	\$	\$	498	
100	3,000	409,383	\$ 18,808	\$ (4,154)	\$ 14,654	\$ 14,156	\$	\$	498	
100	6,000	753,766	\$ 30,441	\$ (7,648)	\$ 22,793	\$ 22,312	\$	\$	480	
110	2,359	488,081	\$ 14,086	\$ (1,192)	\$ 12,894	\$ 12,413	\$	\$	480	
100	3,800	518,817	\$ 22,072	\$ (5,264)	\$ 16,808	\$ 16,331	\$	\$	477	
100	2,800	409,010	\$ 18,237	\$ (4,150)	\$ 14,087	\$ 13,612	\$	\$	475	
100	3,200	442,972	\$ 19,668	\$ (4,495)	\$ 15,173	\$ 14,700	\$	\$	473	
110	3,290	600,949	\$ 16,881	\$ (1,468)	\$ 15,413	\$ 14,945	\$	\$	468	
100	4,500	593,498	\$ 24,712	\$ (6,022)	\$ 18,690	\$ 18,234	\$	\$	455	
100	2,800	403,230	\$ 18,156	\$ (4,092)	\$ 14,064	\$ 13,612	\$	\$	452	
100	2,500	353,881	\$ 16,838	\$ (3,591)	\$ 13,248	\$ 12,797	\$	\$	451	
100	6,000	763,166	\$ 30,507	\$ (7,744)	\$ 22,763	\$ 22,312	\$	\$	451	
110	4,000	522,247	\$ 22,618	\$ (5,299)	\$ 17,319	\$ 16,875	\$	\$	444	
110	3,100	567,454	\$ 16,259	\$ (1,386)	\$ 14,872	\$ 14,428	\$	\$	444	
100	6,200	791,158	\$ 31,324	\$ (8,028)	\$ 23,296	\$ 22,856	\$	\$	440	

Rate Class	Contract Demand	Annual Volume m3	Adjustments including DSM, less Storage and Distribution			Adjusted Bundled Distribution Revenue (\$)	Rate 300 Distribution Revenue (\$)	Rate 125 Distribution Revenue (\$)	Bundled Rate vs Bundled Rate vs	
			Bundled Distribution Revenue (\$)	Commodity	Distribution				Rate 300	Rate 125
100	6,000	752,969	\$ 30,390	\$ (7,640)	\$ 22,750	\$ 22,312	\$	\$	437	
100	4,200	570,407	\$ 23,641	\$ (5,788)	\$ 17,853	\$ 17,419	\$	\$	435	
100	3,600	478,383	\$ 21,076	\$ (4,854)	\$ 16,222	\$ 15,787	\$	\$	434	
100	1,900	340,000	\$ 15,047	\$ (3,450)	\$ 11,597	\$ 11,166	\$	\$	431	
100	5,000	663,846	\$ 26,759	\$ (6,736)	\$ 20,023	\$ 19,594	\$	\$	429	
100	4,100	532,108	\$ 22,970	\$ (5,399)	\$ 17,571	\$ 17,147	\$	\$	424	
100	2,800	393,007	\$ 18,022	\$ (3,988)	\$ 14,034	\$ 13,612	\$	\$	421	
110	2,700	505,024	\$ 14,988	\$ (1,234)	\$ 13,755	\$ 13,341	\$	\$	414	
110	2,700	504,000	\$ 14,983	\$ (1,231)	\$ 13,752	\$ 13,341	\$	\$	412	
100	4,500	572,099	\$ 24,449	\$ (5,805)	\$ 18,644	\$ 18,234	\$	\$	410	
100	2,000	344,459	\$ 15,342	\$ (3,495)	\$ 11,846	\$ 11,437	\$	\$	409	
110	2,500	476,392	\$ 14,366	\$ (1,164)	\$ 13,202	\$ 12,797	\$	\$	406	
110	2,300	450,415	\$ 13,757	\$ (1,100)	\$ 12,657	\$ 12,253	\$	\$	404	
100	4,100	555,717	\$ 23,189	\$ (5,639)	\$ 17,550	\$ 17,147	\$	\$	404	
110	2,500	472,710	\$ 14,348	\$ (1,155)	\$ 13,193	\$ 12,797	\$	\$	396	
110	2,785	508,366	\$ 15,209	\$ (1,242)	\$ 13,967	\$ 13,572	\$	\$	396	
100	2,500	362,655	\$ 16,871	\$ (3,680)	\$ 13,191	\$ 12,797	\$	\$	394	
100	3,300	447,451	\$ 19,896	\$ (4,540)	\$ 15,356	\$ 14,972	\$	\$	384	
110	2,500	465,401	\$ 14,312	\$ (1,137)	\$ 13,175	\$ 12,797	\$	\$	378	
110	2,600	476,198	\$ 14,605	\$ (1,163)	\$ 13,442	\$ 13,069	\$	\$	373	
100	2,600	365,131	\$ 17,147	\$ (3,705)	\$ 13,442	\$ 13,069	\$	\$	373	
100	5,500	701,073	\$ 28,439	\$ (7,114)	\$ 21,326	\$ 20,953	\$	\$	373	
100	3,800	499,921	\$ 21,776	\$ (5,073)	\$ 16,703	\$ 16,331	\$	\$	372	
100	2,500	360,818	\$ 16,827	\$ (3,661)	\$ 13,166	\$ 12,797	\$	\$	369	
115	5,100	1,500,000	\$ 20,773	\$ (544)	\$ 20,229	\$ 19,866	\$	\$	364	
100	5,000	625,823	\$ 26,303	\$ (6,350)	\$ 19,953	\$ 19,594	\$	\$	359	
100	2,500	365,028	\$ 16,859	\$ (3,704)	\$ 13,155	\$ 12,797	\$	\$	358	
100	6,500	820,000	\$ 32,347	\$ (8,321)	\$ 24,026	\$ 23,672	\$	\$	355	
100	3,500	465,038	\$ 20,588	\$ (4,719)	\$ 15,870	\$ 15,516	\$	\$	354	
100	4,100	540,704	\$ 22,987	\$ (5,487)	\$ 17,501	\$ 17,147	\$	\$	354	
100	8,600	1,057,678	\$ 40,465	\$ (10,732)	\$ 29,733	\$ 29,381	\$	\$	352	
100	3,202	453,067	\$ 19,649	\$ (4,597)	\$ 15,051	\$ 14,705	\$	\$	346	
110	2,200	414,783	\$ 13,340	\$ (1,013)	\$ 12,327	\$ 11,981	\$	\$	346	
110	2,400	440,000	\$ 13,945	\$ (1,075)	\$ 12,871	\$ 12,525	\$	\$	346	
110	2,300	426,903	\$ 13,640	\$ (1,043)	\$ 12,598	\$ 12,253	\$	\$	344	
100	1,900	340,005	\$ 14,958	\$ (3,450)	\$ 11,508	\$ 11,166	\$	\$	342	
100	1,950	353,500	\$ 15,223	\$ (3,587)	\$ 11,636	\$ 11,302	\$	\$	335	
110	2,100	397,550	\$ 13,015	\$ (971)	\$ 12,043	\$ 11,709	\$	\$	334	
110	2,300	419,911	\$ 13,606	\$ (1,026)	\$ 12,580	\$ 12,253	\$	\$	327	
110	2,250	412,755	\$ 13,450	\$ (1,008)	\$ 12,442	\$ 12,117	\$	\$	325	
100	10,400	1,279,952	\$ 47,587	\$ (12,988)	\$ 34,599	\$ 34,275	\$	\$	324	
100	3,100	423,382	\$ 19,046	\$ (4,296)	\$ 14,750	\$ 14,428	\$	\$	322	
100	3,000	406,843	\$ 18,602	\$ (4,128)	\$ 14,474	\$ 14,156	\$	\$	318	
100	4,600	593,089	\$ 24,842	\$ (6,018)	\$ 18,824	\$ 18,506	\$	\$	318	
100	7,100	879,663	\$ 34,545	\$ (8,926)	\$ 25,619	\$ 25,303	\$	\$	316	
100	3,600	476,677	\$ 20,939	\$ (4,837)	\$ 16,103	\$ 15,787	\$	\$	315	
100	4,400	565,285	\$ 24,009	\$ (5,736)	\$ 18,273	\$ 17,962	\$	\$	310	
100	4,100	541,857	\$ 22,954	\$ (5,498)	\$ 17,456	\$ 17,147	\$	\$	309	
100	9,500	1,176,797	\$ 44,077	\$ (11,941)	\$ 32,136	\$ 31,828	\$	\$	308	
100	5,800	725,354	\$ 29,437	\$ (7,360)	\$ 22,077	\$ 21,769	\$	\$	308	
100	3,500	462,982	\$ 20,519	\$ (4,698)	\$ 15,821	\$ 15,516	\$	\$	305	
100	2,650	381,901	\$ 17,384	\$ (3,875)	\$ 13,508	\$ 13,205	\$	\$	304	
100	3,500	462,877	\$ 20,515	\$ (4,697)	\$ 15,819	\$ 15,516	\$	\$	303	
100	2,600	362,709	\$ 17,052	\$ (3,680)	\$ 13,371	\$ 13,069	\$	\$	303	
100	4,753	597,139	\$ 25,283	\$ (6,059)	\$ 19,224	\$ 18,922	\$	\$	301	
100	4,000	530,108	\$ 22,553	\$ (5,379)	\$ 17,174	\$ 16,875	\$	\$	299	
100	2,800	383,286	\$ 17,801	\$ (3,889)	\$ 13,911	\$ 13,612	\$	\$	299	
100	2,500	349,072	\$ 16,631	\$ (3,542)	\$ 13,089	\$ 12,797	\$	\$	292	
100	3,500	468,828	\$ 20,565	\$ (4,757)	\$ 15,808	\$ 15,516	\$	\$	292	
100	2,700	365,567	\$ 17,341	\$ (3,709)	\$ 13,632	\$ 13,341	\$	\$	291	
100	2,900	394,567	\$ 18,177	\$ (4,004)	\$ 14,173	\$ 13,884	\$	\$	289	
100	3,900	521,381	\$ 22,176	\$ (5,290)	\$ 16,886	\$ 16,603	\$	\$	283	
100	2,500	350,296	\$ 16,631	\$ (3,554)	\$ 13,077	\$ 12,797	\$	\$	280	
100	3,500	471,805	\$ 20,583	\$ (4,787)	\$ 15,796	\$ 15,516	\$	\$	280	
100	3,000	401,262	\$ 18,508	\$ (4,072)	\$ 14,436	\$ 14,156	\$	\$	280	
100	2,802	404,013	\$ 17,997	\$ (4,100)	\$ 13,897	\$ 13,618	\$	\$	279	
100	3,500	476,033	\$ 20,620	\$ (4,830)	\$ 15,790	\$ 15,516	\$	\$	275	
110	1,865	344,150	\$ 12,185	\$ (841)	\$ 11,345	\$ 11,070	\$	\$	274	
110	1,920	351,068	\$ 12,352	\$ (858)	\$ 11,494	\$ 11,220	\$	\$	274	
110	1,865	342,663	\$ 12,178	\$ (837)	\$ 11,341	\$ 11,070	\$	\$	271	
100	5,000	626,078	\$ 26,211	\$ (6,353)	\$ 19,858	\$ 19,594	\$	\$	265	
100	4,500	579,843	\$ 24,383	\$ (5,884)	\$ 18,499	\$ 18,234	\$	\$	265	
100	5,500	702,249	\$ 28,341	\$ (7,126)	\$ 21,215	\$ 20,953	\$	\$	262	
100	2,500	383,432	\$ 16,948	\$ (3,891)	\$ 13,057	\$ 12,797	\$	\$	260	
100	4,000	521,042	\$ 22,409	\$ (5,287)	\$ 17,122	\$ 16,875	\$	\$	247	
100	3,500	451,430	\$ 20,334	\$ (4,581)	\$ 15,754	\$ 15,516	\$	\$	238	
100	2,500	348,931	\$ 16,573	\$ (3,541)	\$ 13,032	\$ 12,797	\$	\$	236	
100	3,200	426,704	\$ 19,262	\$ (4,330)	\$ 14,932	\$ 14,700	\$	\$	232	
100	2,500	353,670	\$ 16,605	\$ (3,589)	\$ 13,017	\$ 12,797	\$	\$	220	
100	3,700	492,153	\$ 21,264	\$ (4,994)	\$ 16,270	\$ 16,059	\$	\$	211	
100	3,900	526,000	\$ 22,151	\$ (5,337)	\$ 16,813	\$ 16,603	\$	\$	210	
100	3,900	505,283	\$ 21,940	\$ (5,127)	\$ 16,813	\$ 16,603	\$	\$	210	
100	11,000	1,420,675	\$ 50,520	\$ (14,416)	\$ 36,105	\$ 35,906	\$	\$	199	
100	6,000	751,358	\$ 30,131	\$ (7,624)	\$ 22,507	\$ 22,312	\$	\$	194	
100	2,500	342,198	\$ 16,462	\$ (3,472)	\$ 12,989	\$ 12,797	\$	\$	193	
100	4,500	570,916	\$ 24,220	\$ (5,793)	\$ 18,427	\$ 18,234	\$	\$	192	
100	6,000	754,695	\$ 30,159	\$ (7,658)	\$ 22,502	\$ 22,312	\$	\$	189	
100	2,760	387,479	\$ 17,618	\$ (3,932)	\$ 13,687	\$ 13,504	\$	\$	183	
100	4,000	513,888	\$ 22,272	\$ (5,214)	\$ 17,057	\$ 16,875	\$	\$	182	
100	3,420	466,610	\$ 20,214	\$ (4,735)	\$ 15,479	\$ 15,298	\$	\$	181	
100	3,000	401,666	\$ 18,413	\$ (4,076)	\$ 14,337	\$ 14,156	\$	\$	181	
100	2,800	399,092	\$ 17,842	\$ (4,050)	\$ 13,792	\$ 13,612	\$	\$	180	
100	6,000	750,376	\$ 30,103	\$ (7,614)	\$ 22,489	\$ 22,312	\$	\$	176	
100	3,000	407,128	\$ 18,463	\$ (4,131)	\$ 14,332	\$ 14,156	\$	\$	176	

Rate Class	Contract Demand	Annual Volume m3	Adjustments including DSM, less Storage and Distribution			Adjusted Bundled Distribution Revenue (\$)	Rate 300 Distribution Revenue (\$)	Rate 125 Distribution Revenue (\$)	Bundled Rate vs Bundled Rate vs	
			Bundled Distribution Revenue (\$)	Distribution Commodity					Rate 300	Rate 125
100	4,600	581,871	\$ 24,583	\$ (5,904)	\$ 18,679	\$ 18,506	\$	\$	173	
100	5,200	654,829	\$ 26,954	\$ (6,645)	\$ 20,309	\$ 20,137	\$	\$	172	
100	5,400	680,025	\$ 27,744	\$ (6,900)	\$ 20,844	\$ 20,681	\$	\$	163	
100	7,000	856,467	\$ 33,883	\$ (8,691)	\$ 25,193	\$ 25,031	\$	\$	162	
100	3,600	473,156	\$ 20,743	\$ (4,801)	\$ 15,942	\$ 15,787	\$	\$	155	
100	3,000	424,089	\$ 18,613	\$ (4,303)	\$ 14,310	\$ 14,156	\$	\$	154	
100	7,400	928,304	\$ 35,685	\$ (9,419)	\$ 26,266	\$ 26,119	\$	\$	147	
100	2,500	355,329	\$ 16,543	\$ (3,606)	\$ 12,938	\$ 12,797	\$	\$	141	
100	4,000	534,568	\$ 22,435	\$ (5,424)	\$ 17,011	\$ 16,875	\$	\$	136	
100	2,500	357,177	\$ 16,553	\$ (3,624)	\$ 12,929	\$ 12,797	\$	\$	132	
100	2,500	359,870	\$ 16,580	\$ (3,652)	\$ 12,928	\$ 12,797	\$	\$	131	
100	4,742	612,964	\$ 25,242	\$ (6,220)	\$ 19,022	\$ 18,892	\$	\$	130	
100	6,000	736,881	\$ 29,918	\$ (7,477)	\$ 22,441	\$ 22,312	\$	\$	129	
100	2,500	344,407	\$ 16,413	\$ (3,495)	\$ 12,918	\$ 12,797	\$	\$	121	
100	4,500	565,749	\$ 24,090	\$ (5,741)	\$ 18,349	\$ 18,234	\$	\$	115	
100	5,760	717,127	\$ 29,044	\$ (7,277)	\$ 21,768	\$ 21,660	\$	\$	108	
100	2,500	342,365	\$ 16,374	\$ (3,474)	\$ 12,900	\$ 12,797	\$	\$	103	
100	7,000	863,451	\$ 33,892	\$ (8,761)	\$ 25,130	\$ 25,031	\$	\$	99	
100	2,500	353,250	\$ 16,477	\$ (3,584)	\$ 12,892	\$ 12,797	\$	\$	96	
100	2,500	378,121	\$ 16,725	\$ (3,837)	\$ 12,889	\$ 12,797	\$	\$	92	
100	3,500	453,482	\$ 20,206	\$ (4,601)	\$ 15,605	\$ 15,516	\$	\$	89	
100	11,768	1,449,570	\$ 52,791	\$ (14,709)	\$ 38,082	\$ 37,994	\$	\$	88	
100	5,000	629,780	\$ 26,069	\$ (6,390)	\$ 19,678	\$ 19,594	\$	\$	85	
100	5,500	679,781	\$ 27,928	\$ (6,898)	\$ 21,031	\$ 20,953	\$	\$	78	
100	3,000	396,233	\$ 18,251	\$ (4,021)	\$ 14,230	\$ 14,156	\$	\$	74	
100	8,000	975,890	\$ 37,726	\$ (9,902)	\$ 27,824	\$ 27,750	\$	\$	74	
100	1,900	340,500	\$ 14,693	\$ (3,455)	\$ 11,238	\$ 11,166	\$	\$	72	
100	3,800	496,450	\$ 21,439	\$ (5,037)	\$ 16,401	\$ 16,331	\$	\$	70	
100	2,500	341,870	\$ 16,335	\$ (3,469)	\$ 12,866	\$ 12,797	\$	\$	69	
100	3,700	493,714	\$ 21,136	\$ (5,010)	\$ 16,126	\$ 16,059	\$	\$	67	
100	5,000	622,730	\$ 25,979	\$ (6,319)	\$ 19,660	\$ 19,594	\$	\$	67	
100	3,500	470,894	\$ 20,360	\$ (4,778)	\$ 15,581	\$ 15,516	\$	\$	66	
100	2,500	359,837	\$ 16,510	\$ (3,651)	\$ 12,858	\$ 12,797	\$	\$	62	
100	3,600	462,619	\$ 20,542	\$ (4,694)	\$ 15,848	\$ 15,787	\$	\$	60	
100	3,400	478,388	\$ 20,144	\$ (4,854)	\$ 15,290	\$ 15,244	\$	\$	46	
100	2,500	341,133	\$ 16,299	\$ (3,461)	\$ 12,838	\$ 12,797	\$	\$	41	
100	2,500	346,516	\$ 16,353	\$ (3,516)	\$ 12,837	\$ 12,797	\$	\$	40	
100	5,400	668,537	\$ 27,496	\$ (6,784)	\$ 20,712	\$ 20,681	\$	\$	31	
100	4,500	569,078	\$ 24,040	\$ (5,774)	\$ 18,265	\$ 18,234	\$	\$	31	
100	2,500	342,935	\$ 16,302	\$ (3,480)	\$ 12,822	\$ 12,797	\$	\$	25	
100	3,077	421,184	\$ 18,646	\$ (4,274)	\$ 14,372	\$ 14,366	\$	\$	7	
100	2,500	347,890	\$ 16,333	\$ (3,530)	\$ 12,803	\$ 12,797	\$	\$	6	
100	2,500	346,578	\$ 16,315	\$ (3,517)	\$ 12,798	\$ 12,797	\$	\$	2	
Total Distribution Impact:								\$ 3,688,709	\$ 1,075,458	

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #31

UNDERTAKING

TO PROVIDE illustrations for a sample of typical industrial customers served under Rates 100, 110, 115, 135, 145, and 170 showing, for each rate, an example of how the proposed unbundled rates operate to benefit a particular customer in each rate class and an example of how the proposed unbundled rates will not produce any benefit for a particular customer in each rate class. (Tr. 92, April 27, 2006)

RESPONSE

The table below provides a comparison between the current bundled distribution rates and the proposed Rate 300: Unbundled Distribution Service for a typical customer in each rate class. A customer is assumed to benefit if total distribution costs under the unbundled service is less than under the bundled service.

Typical Customer for Each Rate Class	Annual Volume m ³	Bundled Distribution Revenue (\$)	Adjustments including DSM, less Storage and Distribution Commodity	Adjusted Bundled Distribution Revenue (\$)	Rate 300 Distribution Revenue (\$)	Bundled Rate vs Rate 300
Rate 100 Industrial - 20% LF	598,567	25,254	(6,046)	19,208	27,750	(8,542)
Rate 110 Industrial - 75% LF	9,976,120	143,031	(23,943)	119,089	105,098	13,991
Rate 115 Industrial - 80% LF	69,832,850	709,908	(27,933)	681,975	656,184	25,790
Rate 135 Industrial - 20% LF	598,567	8,252	(419)	7,833	28,294	(20,460)
Rate 145 Industrial - 40% LF	598,567	14,606	(2,454)	12,152	17,147	(4,995)
Rate 170 Industrial - 75% LF	69,832,850	287,930	(181,565)	106,364	699,548	(593,184)

The bundled annual distribution revenue for each customer is the sum of customer and delivery charges and is based on the rates approved in the Final Board Order EB-2005-0001.

To facilitate comparison with Rate 300 the bundled distribution revenue from above was adjusted to include Demand Side Management (“DSM”) costs and to exclude storage costs and distribution commodity/unaccounted for gas (“UFG”) costs. The adjustment is needed because bundled distribution rates include storage costs and the UFG. Rate 300 does not include storage costs and Rate 300 customers provide UFG in-kind. With respect to DSM costs, the Company currently recovers DSM costs through its gas supply load balancing charges which are payable by all bundled customers. Should bundled customers migrate to Rate 300 service they would no longer pay gas supply load balancing charges. Consequently, the Company would lose its ability to recover DSM

costs through such a mechanism. Therefore, the Company is proposing to recover its DSM costs through distribution charges starting in 2007. This approach is reflected in the design of Rate 300.

Note that calculation of distribution revenues for Rates 135, 145 and 170 does not include seasonal or interruptible credits.

The Rate 300 annual distribution revenue is the sum of customer charge and demand charge. The derivation of Rate 300 customer and demand charges is shown at Exhibit D/Tab 2/Schedule1/Page 1/Appendix B.

The results show Rate 110 and 115 typical customers would pay less for distribution if they took service under the proposed Rate 300.

A Rate 100 typical customer pays less for distribution under the current bundled rate. Still, as discussed elsewhere, some Rate 100 customers who have cost advantages (i.e. higher load factor) versus the class average would pay less for distribution under Rate 300 as compared to the bundled rate.

From a distribution perspective, Rate 135 seasonal customers and Rate 145 and Rate 170 interruptible customers do not benefit from Rate 300.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #32

UNDERTAKING

TO CONTRAST the service that Union provides to its existing T-service customers under the existing Rate T1 to the services that Enbridge Gas Distribution proposes to provide under the proposed Rate 300 Series of unbundled rates. (Tr. 93, April 27, 2006)

RESPONSE

The following compares Enbridge Gas Distribution's Unbundled Rate 300 and 315 service offering with Union's existing T-1 service. Enbridge developed its service offering based on the operating parameters which exist within Enbridge Gas Distribution's franchise area and its ability to offer these services to its customers.

Attribute	Enbridge Gas Distribution Proposed Rate 300 and 315	Existing Union T-1
Flexibility	<ul style="list-style-type: none"> • Service is to the delivery area • Customer contracts discretely for storage space, deliverability on Rate 315 if needed, and upstream transportation. • Customer with multiple Rate 300 contracts in a primary delivery area can combine nominations but must specify delivery order to each location. • One contract for multiple plants in Enbridge Gas Distribution franchise. • Operational efficiencies through economies of scale. 	<ul style="list-style-type: none"> • Service can access Dawn market • Customer contracts discretely for storage space, deliverability and transportation. • One contract for multiple plants in Union South. • One supply of gas to Union Gas and one common storage account can serve multiple plants. • Operational efficiencies through economies of scale.
Nomination Windows	<ul style="list-style-type: none"> • No requirement to nominate consumption at plant. In conjunctions with pipeline supply, Rates 300 and 315 allow customers to consume up to their firm daily transportation demand at any time during the gas day. • No requirement to nominate injections/withdrawals into/out storage for load balancing provision. • Customer nominates upstream 	<ul style="list-style-type: none"> • No requirement to nominate consumption at plant. No-notice service to the plant allows customer to consume up to his firm daily transportation demand at any time during the gas day. • No requirement to nominate injections/withdrawals into/out storage. • Customer nominates upstream supplies on North American Energy Standards Board ("NAESB")

Attribute	EGD Proposed Rate 300	Existing Union T-1
	supplies on North American Energy Standards Board (“NAESB”) nominations windows. Customers must nominate daily.	nominations windows. Most customers submit a standing nomination on a monthly basis with no requirement to nominate daily.
Balancing	<ul style="list-style-type: none"> • Balancing for this service is performed on a daily basis. • End of day reconciliation results in either a deemed injections into storage or withdrawal from storage depending on whether plant consumption was greater or less than daily delivery of gas to Enbridge Gas Distribution. • Provides maximum flexibility since no notice is required to change consumption pattern or injections/withdrawals. 	<ul style="list-style-type: none"> • Balancing for this service is performed on a daily basis. • End of day reconciliation results in either a deemed injections into storage or withdrawal from storage depending on whether plant consumption was greater or less than daily delivery of gas to Union Gas. • Provides maximum flexibility since no notice is required to change consumption pattern or injections/withdrawals.
Deliverability	<ul style="list-style-type: none"> • Enbridge Gas Distribution will provide load balancing through no notice cost based storage service on 315 with a 1.2% deliverability. • Additional deliverability is provided through Rate 300 load balancing provisions. 	<ul style="list-style-type: none"> • Currently have access to cost-based standard storage deliverability equal to 1.2% of their total contracted storage space. • Customers can contract for higher deliverability at market based rates
Discrete Storage and Distribution Services	<ul style="list-style-type: none"> • No requirement to contract for Enbridge Gas Distribution supplied storage service on Rate 315 as a condition of receiving distribution service. • Customer can elect to take no storage from Enbridge Gas Distribution and contract for storage by a third party storage provider with delivery into Enbridge Gas Distribution delivery area. • Must contract for Rate 300 to access cost-based storage. • Ex-franchise customers can contract for storage service under Enbridge Gas Distribution Rate 325 or 316. 	<ul style="list-style-type: none"> • No requirement to contract for Union supplied storage services as a condition of receiving distribution service. • Customer can elect to take no storage from Union Gas and contract for storage by a third party storage provider. • Must contract for T-1 to access cost-based storage. • Ex-franchise customers can contract for storage service under Union Gas C-1 rates.
Unbundled Services	<ul style="list-style-type: none"> • Reflects a degree of unbundling in respect of distinct contract parameters of upstream capacity, 	<ul style="list-style-type: none"> • Reflects a degree of unbundling in respect of distinct contract parameters of upstream capacity,

Attribute	EGD Proposed Rate 300	Existing Union T-1
	<p>storage space and deliverability, and redelivery to the customers plant(s).</p> <ul style="list-style-type: none"> • Service deems injections and withdrawals into storage through end-of-day allocation process 	<p>storage space and deliverability, and redelivery to the customers plant(s).</p> <ul style="list-style-type: none"> • Service deems injections and withdrawals into storage through end-of-day allocation process
Unbundled Services	<ul style="list-style-type: none"> • Storage and withdrawal rights are for delivery to the franchise area. 	<ul style="list-style-type: none"> • Firm storage and withdrawal rights are for the exclusive purpose of meeting the requirements of the specific locations included in each contract
Inter-franchise movement and redirection of gas	<ul style="list-style-type: none"> • Access to cost-based balancing services (Rider H) to manage over/under consumption on the Enbridge Gas Distribution system. • Access to market based transactional services to facilitate sale or movement of gas upstream and downstream of Dawn. 	<ul style="list-style-type: none"> • Access to cost-based balancing services to manage over/under consumption on the Union Gas system. • Access to market based transactional services to facilitate sale or movement of gas upstream and downstream of Dawn.
Ability to transfer the title of gas in storage	<ul style="list-style-type: none"> • A customer with Rate 315 service and multiple redelivery points has the ability to use one storage account to balance multiple plant locations within the Enbridge Gas Distribution franchise. This essentially provides the ability to move storage gas from one account to another at no costs. • Under 315, customers can title transfer underground in storage • Customers will different storage service parameters can title transfer above ground at Dawn. 	<ul style="list-style-type: none"> • A customer with T-1 service and multiple redelivery points has the ability to use one storage account to balance multiple plant locations within the Union Gas franchise. This essentially provides the ability to move storage gas from one account to another at no costs. • The market place for title transfers in Ontario is above ground at Dawn. • Proactive customers transfer title at a Union interconnect rather than wait until the gas has been injected into storage

Information for Union's T-1 service was obtained from Union Gas's EB-2005-0551 evidence at Appendix E, Pages 1-3.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #33

UNDERTAKING

TO DESCRIBE what are the “system conditions” which would mean that nominations with different Terminal Locations could not be combined under Rate 125, as set out in the “Nominations” section of the Rate Schedule for Rate 125 found at Exhibit C, Tab 2, Schedule 3, page 2. (Tr. 118, April 27, 2006)

RESPONSE

“System Conditions” are any capacity restricted points on an upstream pipeline, or distribution mains that may restrict physical flow, nominations, or changes to intra-day nominations. These conditions are highly variable, and determined by pipeline operations personnel on a daily basis. Situations which could cause a capacity restriction could include, but are not limited to:

- A pipeline operating at its design capacity at a point on the pipeline, not necessarily in the immediate vicinity of the delivery point. Example: A pipeline moving gas from western Canada could have a bottleneck in Manitoba, which could cause a delivery restriction in Ontario, as gas flow would be limited through the bottleneck.
- A pipeline may have a capacity restriction due to maintenance or equipment failure.
- A pipeline may issue a capacity restriction and issue subsequent cuts to nominations due to more gas being nominated than can physically flow.
- A pipeline may issue an intra-day capacity restriction due to increased nominations to, or past a downstream delivery point already operating at or near capacity.
- A distribution system may be forecasting high demand nearing it’s physical capacity and issue an Operational Flow Orders (“OFO”).

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #34

UNDERTAKING

TO EXPLAIN the meaning of term “gross commodity delivery” used in the 3rd paragraph of the “Nominations” section of the Rate Schedule for Rate 125 and to advise if a more appropriate term should be used. (Tr. 119, April 27, 2006)

RESPONSE

Gross commodity delivery equals the expected metered use of gas grossed up for the Unaccounted for Gas (“UFG”) adjustment. If a customer expects to use 100 units at the meter and the UFG adjustment is 2%, the customer must deliver $100/.98$ or 102 units. The term is correct and is defined in the paragraph.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #35

UNDERTAKING

TO ADVISE whether the provisions of the Rate 125 Rate Schedule will prevail over the terms of any contact between Enbridge Gas Distribution and a Rate 125 customer and to advise whether the termination provisions in the Rate Schedule prevail over those in any existing Rate 125 contract. (Tr. 122, April 27, 2006)

RESPONSE

The provisions of the Rate 125 Rate Schedule will prevail over the terms of a contact between Enbridge Gas Distribution and a Rate 125 customer. The details of the conditions which will trigger termination will be laid out in the contract between Enbridge Gas Distribution and the Rate 125 customer.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #36

UNDERTAKING

TO ADVISE what criteria the Company uses to determine the start and end of the winter season and to advise of the appropriate notice period the Company should use to inform customers of the start and end of winter season for Rate 125. (Reference: Exhibit C, Tab 2, Schedule 3, page 5). (Tr. 127, April 27, 2006)

RESPONSE

There are several variables the Company uses to determine the transition from summer to winter and back again. These variables include but are not limited to weather conditions and forecasts, in-franchise demand, gas storage position, and pipeline compression and regulation equipment.

Generally, "winter" will begin mid November to early December and last until late March to mid April, dependant upon a combination of the mentioned variables. To shift to "winter" for the purposes of balancing, in-franchise demand should consistently exceed contracted long haul pipeline supply, and adequate storage injection capability must exist. Inversely, when switching to "summer" for the purposes of balancing, in-franchise demand should consistently be near equal to, or less than contracted long haul pipeline supply, and adequate withdrawal capability must exist in storage. Adequate flexibility in storage is critical to position the utility for normal swings in weather and demand.

The Company will provide 2 days written notice to Rate 125 customers when it expects to switch to the winter season and 2 days notice to switch back to the summer season.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #37

UNDERTAKING

TO ADVISE what is meant by and included in the term “other” in the phrase “STS and other” found as item 9.1 of the table at Exhibit C, Tab 2, Schedule 4, Appendix B. (Tr. 134, April 27, 2006)

RESPONSE

Item 9.1, titled “STS and Other”, in the table at Exhibit C, Tab 2, Schedule 4, Appendix B only reflects Enbridge Gas Distribution’s Storage Transportation Service (“STS”) costs to the Central Delivery Area (“CDA”) and Eastern Delivery Area (“EDA”). Item 9.1 does not include any other costs.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #38

UNDERTAKING

TO PROVIDE an illustrative example of a customer who incurs daily and monthly imbalance charges over a three month period, showing how daily and monthly cumulative imbalance charges would be applied, assuming that the customer contributes some amount to Enbridge Gas Distribution's LBA charges each month. (Tr. 135, April 27, 2006)

RESPONSE

To respond to this Undertaking, Enbridge Gas Distribution used the customer's characteristics from Undertaking #11 which resulted in the following assumptions:

- The customer's max. hourly demand = 4,000 MMBtu = 111 972 m³
- Contract Demand (CD) = 111 972 m³ x 24 = 2 687 328 m³
- Maximum Contractual Imbalance (MCI) = 60% of CD
- MCI = 0.6 x CD = 1 612 397 m³
- The customer clears its cumulative imbalance by the 5th day following month end
- Winter season spans from November 15th to April 15th
- Summer season spans from April 16th to November 14th

The illustrative example in this undertaking covers a three month period from March 2006 to May 2006 and assumes each day is a normal day (i.e., no Operational Flow Order ("OFO") days are declared during the three month period).

Load balancing provisions for the proposed Rate 125 service, including daily and cumulative imbalance charges, reflect Exhibit C, Tab 2, Schedule 3 (proposed tariff for Rate 125) filed on April 21, 2006 as part of the NGEIR proceeding.

The attached tables provide an overview of daily and cumulative imbalances, imbalance charges, proration of Limited Balancing Agreement ("LBA") charges, and cash out amounts. The cash out amounts, for days where cash out occurs, are expressed as imbalance in m³ to which cash out provisions would apply. Comments indicating the price at which the excess imbalances would be cashed out are also provided.

For the purpose of this Undertaking, Enbridge Gas Distribution also assumed that:

- the customer manages its daily imbalances within the 2% Maximum Contractual Imbalance ("MCI") tolerance on all days except on March 31st, April 1st (winter season days) and on April 30th and May 1st days (summer season days);

- the Company only incurs LBA charges on TransCanada Pipelines (“TCPL”) on April 30th and May 1st (please note that the assumptions made with respect to the level and/or management of Company’s imbalances, including imbalances subject to LBA charges, are strictly hypothetical and should only be viewed within the context of this Undertaking response).

Please note that the customer was not assumed to run on days with no daily imbalances. These assumptions allow for a manageable/succinct response to this Undertaking while emphasizing that the load balancing provisions under the proposed Rate 125 encourage customers to act in counter-seasonal manner.

The customer has to clear cumulative imbalances within five (5) days after the end of each month. To accomplish this customer has the following options:

- Use (active) management of deliveries and consumption to bring the imbalance to zero; or
- Transfer the imbalance to its Rate 316 account (if applicable); or
- Trade imbalance; or
- Cash out the imbalance (please refer to the Rate Handbook, Page 8 of 9, Section F – Disposition of Banked Gas Account Balances for cash out provisions).

The sections below summarize results for the three month period.

March

In the month of March, the customer managed its daily imbalances with the 2% of MCI on all days except March 31st. Daily imbalances within +/- 2% MCI tolerance do not incur daily imbalance charges, however, cumulative imbalance charges apply.

The illustration for the month of March assumes the customer cleared its cumulative imbalance through active management of its deliveries and consumption. The customer’s cumulative imbalance is zero on the 5th day of the month.

On March 31st (a winter season gas day), the customer delivered gas, but did not run. Consequently, the customer incurred Tier 1 and Tier 2 daily imbalance charges as well as cumulative imbalance charges. A table showing detailed calculation of imbalance charges on March 31st is attached.

Enbridge Gas Distribution would like to highlight that the customer acted in a counter-seasonal manner on this day, so that its imbalance was in the opposite direction of the system imbalance. Consequently, the customer’s imbalance was not subject to cash out provisions. Similarly, as the customer’s imbalance was in the opposite direction of the total Company’s imbalance, the customer would not get allocated any portion of LBA charges should the Company incur LBA charges on March 31st.

April

In the month of April, the customer again managed its daily imbalances with the 2% of MCI on all days except April 1st and April 30th. Daily imbalances within +/- 2% MCI tolerance do not incur daily imbalance charges, however, cumulative imbalance charges apply.

On April 1st (a winter season gas day), the customer's deliveries exceeded its consumption resulting in Tier 1 and Tier 2 daily imbalance charges as well as cumulative imbalance charges. A table showing detailed calculation of imbalance charges on April 1st is attached.

The illustration for the month of April, assumes the customer cleared its April 1st cumulative imbalance to zero by transferring it to its Rate 316 account. As the customer did not run from April 2nd to April 11th, the customer's did not need to take any additional action to bring its cumulative imbalance to zero by the 5th day of the month.

As on March 31st, the direction of customer's imbalance on April 1st was again opposite to the direction of the system imbalance. Hence, the customer's imbalance was not subject to cash out provisions and would not attract any portion of LBA charges should the Company incur LBA charges on April 1st.

On April 30th (a summer season gas day), the customer delivered gas but did not run. Consequently, the customer incurred Tier 1 daily imbalance charges and cashed out daily imbalance in excess of 10% MCI. The customer also paid cumulative imbalance charge on the portion of the imbalance that was not cashed out. A table showing detailed calculation of imbalance charges on April 30th is attached.

Rate 125 load balancing provisions encourage customers to act in counter-seasonal manner. On April 30th the customer's imbalance was in the seasonal direction. Therefore, the imbalance in excess of 10% MCI was cashed out.

The illustration for April 30th also assumes the Company incurred LBA charges on that day. In this scenario the customer shares in proration of the LBA charges because the customer's imbalance was in the same direction as the total Company imbalance. Note that only the customer's imbalance that was not cashed out is used to prorate LBA charges to the customer. Proration of the LBA charges is depicted in the attached table showing detailed calculation of imbalance charges on April 30th. A high level overview of TCPL's LBA charges is attached also.

May

The customer only ran on May 1st. The customer did not run for the rest of the month.

The illustration for the month of May assumes the customer cleared its May 1st positive cumulative imbalance to zero by trading it with another/other customer(s). As the customer did not run for the rest of the month, the customer's did not need to take any additional action to bring its cumulative imbalance to zero by the 5th day of the month.

The rationale for calculation of daily and cumulative imbalance charges, cash out amounts and for proration of LBA charges for May 1st scenario is the same as discussed under the April 30th scenario above.

In closing, the Company would like to highlight that the outcomes of this illustration are dependent on compatible upstream services being available (e.g., reservation of capacity, more nomination windows, etc.). Similarly, scenarios for March 31st, April 1st, April 30th and May 1st do not take into account the potential for the customer to adjust its nominations through the day using increased nomination windows on upstream pipelines to manage/reduce its final daily imbalance.

Factor to GJ m³ per hour
 1.055056 111,972
 Heat Content
 37.69

Filed: 2006-05-08
 EB-2005-0551
 Undertaking #38
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 Attachment

March 31, 2006

Gas Day	HE	Gas Purchased for MW Produced				Gas Consumed when Dispatched		Gas Purchased for MW Produced in M ³	Gas Consumed when Dispatched in M ³	Hourly Gas Imbalance in M ³	
		Signal	MMBtu	Energy Cost	HOEP	MM	Btu				
31-Mar-2006	1	\$48.79	0.00	65.00	\$50.98			0			
31-Mar-2006	2	\$45.89	0.00	65.00	\$48.10			0			
31-Mar-2006	3	\$41.51	0.00	65.00	\$46.92			0			
31-Mar-2006	4	\$41.20	0.00	65.00	\$44.85			0			
31-Mar-2006	5	\$47.64	0.00	65.00	\$42.35			0			
31-Mar-2006	6	\$117.72	4000.00	65.00	\$40.81	4,000	111,972	111,972		111,972	
31-Mar-2006	7	\$133.79	4000.00	65.00	\$47.17	4,000	111,972	111,972		111,972	
31-Mar-2006	8	\$172.07	4000.00	65.00	\$48.78	4,000	111,972	111,972		111,972	
31-Mar-2006	9	\$168.03	4000.00	65.00	\$49.75	4,000	111,972	111,972		111,972	
1-Apr-2006	10	\$163.40	0.00	65.00	\$52.32	-	0	0		0	
1-Apr-2006	11	\$178.71	0.00	65.00	\$53.73	-	0	0		0	
1-Apr-2006	12	\$159.99	0.00	65.00	\$52.15	-	0	0		0	
1-Apr-2006	13	\$141.94	0.00	65.00	\$51.21	-	0	0		0	
1-Apr-2006	14	\$137.23	0.00	65.00	\$53.03	-	0	0		0	
1-Apr-2006	15	\$136.15	0.00	65.00	\$49.53	-	0	0		0	
1-Apr-2006	16	\$137.23	0.00	65.00	\$49.10	-	0	0		0	
1-Apr-2006	17	\$150.44	0.00	65.00	\$46.61	-	0	0		0	
1-Apr-2006	18	\$193.31	0.00	65.00	\$73.15	-	0	0	0	0	
1-Apr-2006	19	\$240.71	0.00	65.00	\$83.42	-	0	0	0	0	
1-Apr-2006	20	\$200.13	0.00	65.00	\$83.39	-	0	0	0	0	
1-Apr-2006	21	\$193.33	0.00	65.00	\$74.52	-	0	0	0	0	
1-Apr-2006	22	\$163.98	0.00	65.00	\$52.43	-	0	0		0	
1-Apr-2006	23	\$130.57	0.00	65.00	\$54.78	-	0	0		0	
1-Apr-2006	24	\$58.17	0.00	65.00	\$45.36	-	0	0		0	
						Total for 31-Mar-2006	=	447,888	0	447,888	447,888

Winter Season Normal Day:

CD=Max hourly flow x 24 hours
 MCI=factor x CD

Hours= 24
 Factor= 0.6
 2,687,328 = CD (m³)
 1,612,397 = MCI (m³)

2% MCI
 >2 to 10% MCI

Level= 2% 32,248 m³
 Level= 2%to10% 128,992 m³
 Level= 10% 161,240 m³

Tier Imbalance:	¢ per M3	Tier Charge
Tier 0 - no charge	32,248	0.0 \$ -
Tier 1	128,992	0.885 \$ 1,142
Tier 2	286,648	1.062 \$ 3,044
	447,888	\$ 4,186 = Daily Imbalance Charges on March 31st

Cum Imbalance: 447,888 ¢ per M3 1.895 \$ 8,487 = Cumulative Imbalance Charges on March 31st

Total Charge: \$ 12,673 = Total Imbalance Charges on March 31st

Load Balancing Charges:

Mar-06							
Day	Daily Imbalance	Cumulative Imbalance	Daily Imbalance Charges	Cumulative Imbalance Charges	Prorata of LBA Charges	Total Imbalance Charges	Total Cash Out
	m ³	m ³	(\$)	(\$)	(\$)	(\$)	m ³
1	30,000	30,000	\$ -	\$ 569	\$ -	\$ 569	0
2	(10,000)	20,000	\$ -	\$ 379	\$ -	\$ 379	0
3	(20,000)	-	\$ -	\$ -	\$ -	\$ -	0
4	-	-	\$ -	\$ -	\$ -	\$ -	0
5	-	-	\$ -	\$ -	\$ -	\$ -	0
6	10,000	10,000	\$ -	\$ 190	\$ -	\$ 190	0
7	10,000	20,000	\$ -	\$ 379	\$ -	\$ 379	0
8	10,000	30,000	\$ -	\$ 569	\$ -	\$ 569	0
9	(5,000)	25,000	\$ -	\$ 474	\$ -	\$ 474	0
10	(25,000)	-	\$ -	\$ -	\$ -	\$ -	0
11	-	-	\$ -	\$ -	\$ -	\$ -	0
12	-	-	\$ -	\$ -	\$ -	\$ -	0
13	-	-	\$ -	\$ -	\$ -	\$ -	0
14	-	-	\$ -	\$ -	\$ -	\$ -	0
15	-	-	\$ -	\$ -	\$ -	\$ -	0
16	-	-	\$ -	\$ -	\$ -	\$ -	0
17	-	-	\$ -	\$ -	\$ -	\$ -	0
18	-	-	\$ -	\$ -	\$ -	\$ -	0
19	-	-	\$ -	\$ -	\$ -	\$ -	0
20	-	-	\$ -	\$ -	\$ -	\$ -	0
21	-	-	\$ -	\$ -	\$ -	\$ -	0
22	15,000	15,000	\$ -	\$ 284	\$ -	\$ 284	0
23	5,000	20,000	\$ -	\$ 379	\$ -	\$ 379	0
24	(10,000)	10,000	\$ -	\$ 190	\$ -	\$ 190	0
25	-	10,000	\$ -	\$ 190	\$ -	\$ 190	0
26	-	10,000	\$ -	\$ 190	\$ -	\$ 190	0
27	(10,000)	-	\$ -	\$ -	\$ -	\$ -	0
28	20,000	20,000	\$ -	\$ 379	\$ -	\$ 379	0
29	(10,000)	10,000	\$ -	\$ 190	\$ -	\$ 190	0
30	(10,000)	-	\$ -	\$ -	\$ -	\$ -	0
31	447,888	447,888	\$ 4,186	\$ 8,487	\$ -	\$ 12,673	0
Sum			\$ 4,186	\$ 12,846	\$ -	\$ 17,032	0

April 1, 2006

Gas Day	HE	Gas Purchased for MW Produced				Gas Consumed when Dispatched		Gas Purchased for MW Produced in M ³	Gas Consumed when Dispatched in M3	Hourly Gas Imbalance in M3		
		Signal	MMBtu	Energy Cost	HOEP	MM	Btu					
31-Mar-2006	1	\$48.79	0.00	65.00	\$50.98			0				
31-Mar-2006	2	\$45.89	0.00	65.00	\$48.10			0				
31-Mar-2006	3	\$41.51	0.00	65.00	\$46.92			0				
31-Mar-2006	4	\$41.20	0.00	65.00	\$44.85			0				
31-Mar-2006	5	\$47.64	0.00	65.00	\$42.35			0				
31-Mar-2006	6	\$117.72	4000.00	65.00	\$40.81			111,972	4,000	111,972		
31-Mar-2006	7	\$133.79	4000.00	65.00	\$47.17			111,972	4,000	111,972		
31-Mar-2006	8	\$172.07	4000.00	65.00	\$48.78			111,972	4,000	111,972		
31-Mar-2006	9	\$168.03	4000.00	65.00	\$49.75			111,972	4,000	111,972		
1-Apr-2006	10	\$163.40	4000.00	65.00	\$52.32			111,972	4,000	111,972		
1-Apr-2006	11	\$178.71	4000.00	65.00	\$53.73			111,972	4,000	111,972		
1-Apr-2006	12	\$159.99	4000.00	65.00	\$52.15			111,972	4,000	111,972		
1-Apr-2006	13	\$141.94	4000.00	65.00	\$51.21			111,972	4,000	111,972		
1-Apr-2006	14	\$137.23	4000.00	65.00	\$53.03			111,972	4,000	111,972		
1-Apr-2006	15	\$136.15	4000.00	65.00	\$49.53			111,972	4,000	111,972		
1-Apr-2006	16	\$137.23	4000.00	65.00	\$49.10			111,972	4,000	111,972		
1-Apr-2006	17	\$150.44	4000.00	65.00	\$46.61			111,972	4,000	111,972		
1-Apr-2006	18	\$193.31	4000.00	65.00	\$73.15	4,000		111,972	111,972	111,972		
1-Apr-2006	19	\$240.71	4000.00	65.00	\$83.42	4,000		111,972	111,972	111,972		
1-Apr-2006	20	\$200.13	4000.00	65.00	\$83.39	4,000		111,972	111,972	111,972		
1-Apr-2006	21	\$193.33	4000.00	65.00	\$74.52	4,000		111,972	111,972	111,972		
1-Apr-2006	22	\$163.98	4000.00	65.00	\$52.43		4,000	111,972		111,972		
1-Apr-2006	23	\$130.57	4000.00	65.00	\$54.78		4,000	111,972		111,972		
1-Apr-2006	24	\$58.17	0.00	65.00	\$45.36			0				
						Total for	1-Apr-2006	=	1,567,608	447,888	1,119,720	1,567,608

Winter Season Normal Day:

CD=Max hourly flow x 24 hours Hours= 24 2,687,328 = CD (m³)
 MCI=factor x CD Factor= 0.6 1,612,397 = MCI (m³)

2% MCI Level= 2% 32,248 m³
 >2 to 10% MCI Level= 2%to10% 128,992 m³
 Level= 10% 161,240 m³

Tier Imbalance:	¢ per M3	Tier Charge
Tier 0 - no charge	32,248	0.0 \$ -
Tier 1	128,992	0.885 \$ 1,142
Tier 2	958,480	1.062 \$ 10,179
	1,119,720	\$ 11,321 = Daily Imbalance Charges on April 1

Cum Imbalance:	¢ per M3	CI Charge
447,888	1.895 \$	8,487 = Cumulative Imbalance Charges on March 31st
1,119,720	1.895 \$	21,219 = Cumulative Imbalance Charges on April 1st
	\$	29,706 = Total Cumulative Imbalance Charges on April 1st

Total Charge: \$ 41,027 = Total Imbalance Charges on April 1st

April 30, 2005

Gas Day	HE	Pre-Dispatch Signal	Gas Purchased for MW Produced			Gas Consumed when Dispatched		Gas Purchased for MW Produced in M ³	Gas Consumed when Dispatched in M3	Hourly Gas Imbalance in M3	
			MMBtu	Energy Cost	HOEP	Btu	Hourly Gas Imbalance				
30-Apr-2005	1	\$37.39	0.00	65.00	\$55.25			0			
30-Apr-2005	2	\$42.27	0.00	65.00	\$44.02			0			
30-Apr-2005	3	\$36.66	0.00	65.00	\$38.14			0			
30-Apr-2005	4	\$36.66	0.00	65.00	\$35.81			0			
30-Apr-2005	5	\$37.19	0.00	65.00	\$36.68			0			
30-Apr-2005	6	\$42.01	0.00	65.00	\$36.85			0			
30-Apr-2005	7	\$43.32	0.00	65.00	\$35.58			0			
30-Apr-2005	8	\$70.28	4000.00	65.00	\$39.45		4,000	111,972		111,972	
30-Apr-2005	9	\$101.70	4000.00	65.00	\$49.19		4,000	111,972		111,972	
1-May-2005	10	\$109.16	0.00	65.00	\$63.74			0		0	
1-May-2005	11	\$138.13	0.00	65.00	\$72.77	-		0	0		
1-May-2005	12	\$150.00	0.00	65.00	\$74.54	-		0	0		
1-May-2005	13	\$129.22	0.00	65.00	\$67.33	-		0	0		
1-May-2005	14	\$108.23	0.00	65.00	\$68.56	-		0	0		
1-May-2005	15	\$118.18	0.00	65.00	\$65.30	-		0	0		
1-May-2005	16	\$107.76	0.00	65.00	\$69.77	-		0	0		
1-May-2005	17	\$108.52	0.00	65.00	\$46.80	-		0		0	
1-May-2005	18	\$107.99	0.00	65.00	\$37.40	-		0		0	
1-May-2005	19	\$128.89	0.00	65.00	\$36.01	-		0		0	
1-May-2005	20	\$150.00	0.00	65.00	\$36.35	-		0		0	
1-May-2005	21	\$128.58	0.00	65.00	\$35.37	-		0		0	
1-May-2005	22	\$128.26	0.00	65.00	\$35.22	-		0		0	
1-May-2005	23	\$100.68	0.00	65.00	\$35.71	-		0		0	
1-May-2005	24	\$66.00	0.00	65.00	\$39.03	-		0		0	
							Total for 30-Apr-2005 =	223,944	0	223,944	223,944

Summer Season Normal Day:

CD=Max hourly flow x 24 hours
 MCI=factor x CD

Hours= 24
 Factor= 0.6
 2,687,328 = CD (m³)
 1,612,397 = MCI (m³)

2% MCI
 >2 to 10% MCI

Level= 2% 32,248 m³
 Level= 2%to10% 128,992 m³
 Level= 10% 161,240 m³

Tier Imbalance:	¢ per M3	Tier Charge	
Tier 0 - free zone	32,248	0.0 \$	-
Tier 1	128,992	0.885 \$	1,142
Tier 2	62,704	1.062	Cash Out
	223,944	\$	1,142 = Daily Imbalance Charges on April 30th + Cash Out

Cum Imbalance: 161,240 m³
 1.895 ¢ per M3 \$ 3,055 = Cumulative Imbalance Charges on April 30th

Total Charge: \$ 4,197 = Total Imbalance Charges on April 30th + Cash Out

Total Cash Out 62,704 m³

EGD reserves the right to cash out excess at 50% of the lowest daily index cost of gas.

Prorata of LBA Charges:

50,000,000 m³ = Total Nominated to EGD CDA
 1,000,000 m³ = 2% LBA Tolerance on April 30th where no Daily LBA Charges Apply
 1,612,397 m³ = Total Company Imbalance on April 30th (falls within Tier 1 = 2% and 4%); includes customer's imbalance
 612,397 m³ = Company's Imbalance Subject to Tier 1 Daily LBA Charges
 161,240 m³ = Customer's April 30th Imbalance from Above Used to Prorate Daily LBA Charges
 10.00% = Customer's Imbalance as % of Total Company Imbalance

Daily LBA Charges:

Tier 1 = 2% - 4%
 Tier 1 Fee = 0.2 x TCPL FT Daily Demand Charge
 \$ 0.8704 TCPL FT Daily Demand Charge in \$/GJ per day (as per April 1, 2006 QRAM)
 \$ 0.0328 TCPL FT Daily Demand Charge in \$/m³ per day (as per April 1, 2006 QRAM)
 \$ 0.0066 = Tier 1 Fee
 Tier 1 Charges
 \$ 4,018 = Total Company Tier 1 LBA Charges on April 30th
 \$ 402 = Customer's Share of Tier 1 LBA Charges on April 30th (10% of \$4,018)

Cumulative LBA Charges:

1,612,397 m³ = Total Company Cumulative Imbalance on April 30th; includes customer's imbalance
 161,240 m³ = Customer's Imbalance from Above Used to Prorate Cumulative LBA Charges
 \$ - Cumulative LBA charges = 0 on April 30th (total Company cumulative imbalance < 4% tolerance)

Load Balancing Charges:

Apr-06							
Day	Daily Imbalance	Cumulative Imbalance	Daily Imbalance Charges	Cumulative Imbalance Charges	Prorata of LBA Charges	Total Imbalance Charges	Total Cash Out
	m ³	m ³	(\$)	(\$)	(\$)	(\$)	m ³
1	1,119,720	1,567,608	\$ 11,321	\$ 29,706	\$ -	\$ 41,027	0
2	-	-	\$ -	\$ -	\$ -	\$ -	0
3	-	-	\$ -	\$ -	\$ -	\$ -	0
4	-	-	\$ -	\$ -	\$ -	\$ -	0
5	-	-	\$ -	\$ -	\$ -	\$ -	0
6	-	-	\$ -	\$ -	\$ -	\$ -	0
7	-	-	\$ -	\$ -	\$ -	\$ -	0
8	-	-	\$ -	\$ -	\$ -	\$ -	0
9	-	-	\$ -	\$ -	\$ -	\$ -	0
10	-	-	\$ -	\$ -	\$ -	\$ -	0
11	-	-	\$ -	\$ -	\$ -	\$ -	0
12	(30,000)	(30,000)	\$ -	\$ 569	\$ -	\$ 569	0
13	20,000	(10,000)	\$ -	\$ 190	\$ -	\$ 190	0
14	10,000	-	\$ -	\$ -	\$ -	\$ -	0
15	-	-	\$ -	\$ -	\$ -	\$ -	0
16	-	-	\$ -	\$ -	\$ -	\$ -	0
17	15,000	15,000	\$ -	\$ 284	\$ -	\$ 284	0
18	5,000	20,000	\$ -	\$ 379	\$ -	\$ 379	0
19	5,000	25,000	\$ -	\$ 474	\$ -	\$ 474	0
20	5,000	30,000	\$ -	\$ 569	\$ -	\$ 569	0
21	(20,000)	10,000	\$ -	\$ 190	\$ -	\$ 190	0
22	-	10,000	\$ -	\$ 190	\$ -	\$ 190	0
23	-	10,000	\$ -	\$ 190	\$ -	\$ 190	0
24	(10,000)	-	\$ -	\$ -	\$ -	\$ -	0
25	-	-	\$ -	\$ -	\$ -	\$ -	0
26	-	-	\$ -	\$ -	\$ -	\$ -	0
27	-	-	\$ -	\$ -	\$ -	\$ -	0
28	-	-	\$ -	\$ -	\$ -	\$ -	0
29	-	-	\$ -	\$ -	\$ -	\$ -	0
30	161,240	161,240	\$ 1,142	\$ 3,055	\$ 402	\$ 4,599	62,704
Sum			\$ 12,462	\$ 35,794	\$ 402	\$ 48,658	62,704

Factor to GJ m³ per hour
 1.055056 111,972
 Heat Content
 37.69

May 1, 2005

Gas Day	HE	Pre-Dispatch Signal	Gas Purchased for MW Produced			Gas Consumed when Dispatched		Gas Purchased for MW Produced in M ³	Gas Consumed when Dispatched in M3	Hourly Gas Imbalance in M3		
			MMBtu	Energy Cost	HOEP	Btu	Hourly Gas Imbalance					
30-Apr-2005	1	\$37.39	0.00	65.00	\$55.25			0				
30-Apr-2005	2	\$42.27	0.00	65.00	\$44.02			0				
30-Apr-2005	3	\$36.66	0.00	65.00	\$38.14			0				
30-Apr-2005	4	\$36.66	0.00	65.00	\$35.81			0				
30-Apr-2005	5	\$37.19	0.00	65.00	\$36.68			0				
30-Apr-2005	6	\$42.01	0.00	65.00	\$36.85			0				
30-Apr-2005	7	\$43.32	0.00	65.00	\$35.58			0				
30-Apr-2005	8	\$70.28	4000.00	65.00	\$39.45		4,000	111,972		111,972		
30-Apr-2005	9	\$101.70	4000.00	65.00	\$49.19		4,000	111,972		111,972		
1-May-2005	10	\$109.16	4000.00	65.00	\$63.74			111,972		111,972		
1-May-2005	11	\$138.13	4000.00	65.00	\$72.77	4,000		111,972	111,972			
1-May-2005	12	\$150.00	4000.00	65.00	\$74.54	4,000		111,972	111,972			
1-May-2005	13	\$129.22	4000.00	65.00	\$67.33	4,000		111,972	111,972			
1-May-2005	14	\$108.23	4000.00	65.00	\$68.56	4,000		111,972	111,972			
1-May-2005	15	\$118.18	4000.00	65.00	\$65.30	4,000		111,972	111,972			
1-May-2005	16	\$107.76	4000.00	65.00	\$69.77	4,000		111,972	111,972			
1-May-2005	17	\$108.52	4000.00	65.00	\$46.80		4,000	111,972		111,972		
1-May-2005	18	\$107.99	4000.00	65.00	\$37.40		4,000	111,972		111,972		
1-May-2005	19	\$128.89	4000.00	65.00	\$36.01		4,000	111,972		111,972		
1-May-2005	20	\$150.00	4000.00	65.00	\$36.35		4,000	111,972		111,972		
1-May-2005	21	\$128.58	4000.00	65.00	\$35.37		4,000	111,972		111,972		
1-May-2005	22	\$128.26	4000.00	65.00	\$35.22		4,000	111,972		111,972		
1-May-2005	23	\$100.68	4000.00	65.00	\$35.71		4,000	111,972		111,972		
1-May-2005	24	\$66.00	4000.00	65.00	\$39.03		4,000	111,972		111,972		
Total for 1-May-2005								=	1,679,580	671,832	1,007,748	1,679,580

Summer Season Normal Day:

CD=Max hourly flow x 24 hours
 MCI=factor x CD

Hours= 24
 Factor= 0.6
 2,687,328 = CD (m³)
 1,612,397 = MCI (m³)

2% MCI
 >2 to 10% MCI

Level= 2% 32,248 m³
 Level= 2%to10% 128,992 m³
 Level= 10% 161,240 m³

Tier Imbalance:	¢ per M3	Tier Charge	
Tier 0 - no charge	0.0	\$	-
Tier 1	128,992	0.885	\$ 1,142
Tier 2	846,508	1.062	Cash Out
	1,007,748		\$ 1,142 = Daily Imbalance Charges on May 1st + Cash Out

Cum Imbalance:	¢ per M3	CI Charge	
161,240	1.895	\$	3,055 = Cumulative Imbalance Charges on April 30th
161,240	1.895	\$	3,055 = Cumulative Imbalance Charges on May 1st
		\$	6,111 = Total Cumulative Imbalance Charges on May 1st

Total Charge: \$ 7,253 = Total Imbalance Charges on May 1st + Cash Out

Total Cash Out 846,508 m³
 EGD reserves the right to cash out excess at 50% of the lowest daily index cost of gas!

Prorata of LBA Charges:

25,000,000 m³ = Total Nominated to EGD CDA
 500,000 m³ = 2% Daily LBA Tolerance on May 1st where no Daily LBA Charges Apply
 1,250,000 m³ = Total Company Imbalance on May 1st (falls within Tier 2 = 4% and 8%); includes customer's imbalance
 500,000 m³ = Company's Imbalance Subject to Tier 1 Daily LBA Charges
 250,000 m³ = Company's Imbalance Subject to Tier 2 Daily LBA Charges
 161,240 m³ = Customer's May 1st Imbalance from Above Used to Prorate LBA Charges
 12.90% = Customer's Imbalance as % of Total Company Imbalance

Daily LBA Charges:

Tier 1 = 2% - 4%
 Tier 1 Fee = 0.2 x TCPL FT Daily Demand Charge
 \$ 0.8704 TCPL FT Daily Demand Charge in \$/GJ per day (as per April 1, 2006 QRAM)
 \$ 0.0328 TCPL FT Daily Demand Charge in \$/m³ per day (as per April 1, 2006 QRAM)
 \$ 0.0066 = Tier 1 Fee
 Tier 1 Charges
 \$ 3,280 = Total Company Tier 1 Daily LBA Charges on May 1st
 \$ 423 = Customer's Share of Tier 1 Daily LBA Charges on May 1st (12.9% of \$3,280)

Tier 2 = 4% - 8%
 Tier 2 Fee = 0.5 x TCPL Daily Demand Charge
 \$ 0.0164 = Tier 2 Fee
 Tier 2 Charges
 \$ 4,101 = Total Company Tier 2 Daily LBA Charges on May 1st
 \$ 529 = Customer's Share of Tier 2 Daily LBA Charges on May 1st (12.9% of \$4,101)

\$ 952 = Total Customer's Share of Daily LBA Charges on May 1st

Cumulative LBA Charges:

1,612,397 m³ = Company's Cumulative Imbalance on April 30th; includes customer's imbalance
 161,240 m³ = Customer's Cumulative Imbalance on April 30th Used to Prorate Cumulative LBA Charges

1,250,000 m³ = Company's Cumulative Imbalance on May 1st; includes customer's imbalance
161,240 m³ = Customer's Imbalance on May 1st Used to Prorate Cumulative LBA Charges
2,862,397 m³ = Total Company's Cumulative Imbalance on May 1st; includes customer's imbalance
1,000,000 m³ = 4% Cumulative LBA Tolerance on May 1st where no Cumulative LBA Charges Apply
500,000 m³ = Company's Cumulative Imbalance Subject to Tier 1 Cumulative LBA Charges
1,362,397 m³ = Company's Cumulative Imbalance Subject to Tier 2 Cumulative LBA Charges
322,479 m³ = Customer's Contribution to Total Company's Cumulative Imbalance Used to Prorate LBA Charges
11.27% = Customer's Imbalance as % of Total Company Cumulative Imbalance

Tier 1 = 4% - 6%

Tier 1 Fee = 0.15 x TCPL FT Daily Demand Charge

\$ 0.0049 = Tier 1 Fee

Tier 1 Charges

\$ 2,460 = Total Company Tier 1 Cumulative LBA Charges on May 1st

\$ 277 = Customer's Share of Tier 1 Cumulative LBA Charges on May 1st (11.27% of \$2,460)

Tier 2 = greater > 6%

Tier 2 Fee = 0.25 x TCPL FT Daily Demand Charge

\$ 0.0082 = Tier 2 Fee

Tier 2 Charges

\$ 11,173 = Total Company Tier 2 Cumulative LBA Charges on May 1st

\$ 1,259 = Customer's Share of Tier 2 Cumulative LBA Charges on May 1st (11.27% of \$11,173)

\$ 1,536 = Total Customer's Share of Cumulative LBA Charges on May 1st

Load Balancing Charges:

May-06							
Day	Daily Imbalance	Cumulative Imbalance	Daily Imbalance Charges	Cumulative Imbalance Charges	Prorata of LBA Charges	Total Imbalance Charges	Total Cash Out
	m ³	m ³	(\$)	(\$)	(\$)	(\$)	m ³
1	161,240	322,479	\$ 1,142	\$ 6,111	\$ 2,488	\$ 9,741	846,508
2	-	-	\$ -	\$ -	\$ -	\$ -	-
3	-	-	\$ -	\$ -	\$ -	\$ -	-
4	-	-	\$ -	\$ -	\$ -	\$ -	-
5	-	-	\$ -	\$ -	\$ -	\$ -	-
6	-	-	\$ -	\$ -	\$ -	\$ -	-
7	-	-	\$ -	\$ -	\$ -	\$ -	-
8	-	-	\$ -	\$ -	\$ -	\$ -	-
9	-	-	\$ -	\$ -	\$ -	\$ -	-
10	-	-	\$ -	\$ -	\$ -	\$ -	-
11	-	-	\$ -	\$ -	\$ -	\$ -	-
12	-	-	\$ -	\$ -	\$ -	\$ -	-
13	-	-	\$ -	\$ -	\$ -	\$ -	-
14	-	-	\$ -	\$ -	\$ -	\$ -	-
15	-	-	\$ -	\$ -	\$ -	\$ -	-
16	-	-	\$ -	\$ -	\$ -	\$ -	-
17	-	-	\$ -	\$ -	\$ -	\$ -	-
18	-	-	\$ -	\$ -	\$ -	\$ -	-
19	-	-	\$ -	\$ -	\$ -	\$ -	-
20	-	-	\$ -	\$ -	\$ -	\$ -	-
21	-	-	\$ -	\$ -	\$ -	\$ -	-
22	-	-	\$ -	\$ -	\$ -	\$ -	-
23	-	-	\$ -	\$ -	\$ -	\$ -	-
24	-	-	\$ -	\$ -	\$ -	\$ -	-
25	-	-	\$ -	\$ -	\$ -	\$ -	-
26	-	-	\$ -	\$ -	\$ -	\$ -	-
27	-	-	\$ -	\$ -	\$ -	\$ -	-
28	-	-	\$ -	\$ -	\$ -	\$ -	-
29	-	-	\$ -	\$ -	\$ -	\$ -	-
30	-	-	\$ -	\$ -	\$ -	\$ -	-
31	-	-	\$ -	\$ -	\$ -	\$ -	-
Sum			\$ 1,142	\$ 6,111	\$ 2,488	\$ 9,741	846,508

LBA Fee Summary

Tier 1 Imbalance Fee = T1 Imbalance x T1 Fee
 Tier 2 Imbalance Fee = T2 Imbalance x T2 Fee
 Tier 3 Imbalance Fee = T3 Imbalance x T3 Fee
 Tier 4 Imbalance Fee = T4 Imbalance x T4 Fee

Daily Imbalances

	Tier 1	Tier 2	Tier 3	Tier 4
Quantity (Total Authorized Quantity (daily))	2 - 4% TAQ	4 - 8% TAQ	8 - 10% TAQ	> 10% TAQ
Fee (FTD = FT Daily Demand Charge)	0.2 FTD	0.5 FTD	0.75 FTD	1.0 FTD
EOC Draft Multiplier	1.0	1.25	1.50	2.0
EOC Pack Multiplier	0	0	0	0

Cumulative Imbalances

	Tier 1	Tier 2
Quantity	4 - 6%	> 6%
Fee	0.15 FTD	0.25 FTD
EOC Draft Multiplier	0.15	0.25
EOC Pack Multiplier	0	0

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #39

UNDERTAKING

TO ADVISE what “operational considerations” would limit injection or withdrawal under Rate 316, and to advise whether, in effect, OFOs apply to service under Rate 316. (Reference: Exhibit C, Tab 3, Schedule 1, page 9). (Tr. 145, April 27, 2006)

RESPONSE

This issue will be addressed by updated evidence to be filed by Enbridge Gas Distribution.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #40

UNDERTAKING

To advise whether there will be automatic renewal rights for storage contracts under Rate 316 (reference: Exhibit C, Tab 3, Schedule 1, pg. 10). (Tr. 148, April 27, 2006)

RESPONSE

At this time Enbridge Gas Distribution is not considering automatic renewal rights for storage contracts under Rate 316. At the expiry of a contract, the storage capacity (and associated injection and withdrawal rights) under the expired contract will be remarketed through a subsequent open season process.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #41

UNDERTAKING

To advise whether, with the Company's proposed Rate 315, a customer who withdraws 200 units from storage and only uses 150 units can move the gas to Dawn and sell it (i.e. whether such a decision would contravene the provision at Exhibit D, Tab 3, Schedule 1, page 4 which states "storage service is not available for delivery to secondary delivery points".) (Tr. 161, April 27, 2006)

RESPONSE

Under the provisions of the proposed Rate 315, a customer who nominates 200 units to the delivery area but consumes only 150, will be out of balance under Rate 300 and the 50 units is managed under its balancing provisions.

Rate 315 is a delivered storage service. Consequently all service is nominated for delivery to the customers' meter in the Central Delivery Area ("CDA") or the Eastern Delivery Area ("EDA"). All of the un-nominated storage is available for No-Notice service. The Company expects that the No-Notice feature of Rate 315, which allows the full amount of storage deliverability to be used to offset imbalances at the meter will prevail over customers nominating a volume of gas and paying balancing provisions on Rate 300.

The customer has the option to title transfer gas in storage to manage inventory, utilize enhanced title transfer services to manage imbalances, or direct deliveries made to the CDA or the EDA to Dawn using market services such as TransCanada Pipeline's ("TCPL") IT service. Finally, customers wishing to use storage to transact at Dawn on a regular basis, may consider Rate 316: High Deliverability Gas Storage Service (Customer Arranged Transport).

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #42

UNDERTAKING

To advise how a customer under Rate 315 can plan its operations if injection and withdrawal are “subject to applicable storage ratchets as determined by the Company and posted from time to time”. (Reference: Exhibit D, Tab3, Schedule2, page 1). (Tr.163, April 27, 2006)

RESPONSE

Storage ratchets are based on system capacity through the latter portions of the injection and withdrawal seasons. Alteration to the normal pattern of injection and withdrawal caused by planned construction and maintenance can affect capacity at different stages of either season. These capacity changes will have an impact on the storage system’s ability to meet the current set of ratchets and the ratchets therefore must be adjusted to capture the new system limits.

When necessary, revised storage ratchets will be posted by the Company in a timely manner on or before October 1 for the withdrawal season immediately following that date and on or before April 1 for the injection season that immediately follows. Due to the fact that the ratchets usually don’t take effect until the mid to latter stages of the injection or withdrawal season this should provide the Rate 315 customer with sufficient time to plan their operations.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #43

UNDERTAKING

TO CONFIRM that volumes in a customer's load balancing account can be nominated to supply an authorized demand overrun. (Tr. 176, April 27, 2006)

RESPONSE

Yes, a positive balance in a Rate 300 load balancing account can be nominated to supply an authorized demand overrun. A separate nomination must be submitted to use this volume as a supply source. In the absence of a nomination, these volumes would be treated as unauthorized supply overrun.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #44

UNDERTAKING

TO PRODUCE a table setting out, for each of the four rates at issue, the implementation costs, the preferred implementation dates and whether the rates will be based on 2006 or 2007 cost allocation. (Tr. 182, April 27, 2006)

RESPONSE

The table below outlines the implementation criteria for each of the Company's four service offerings. The customer charge under the implementation costs heading is designed to recover the forecast revenue requirement for implementation costs of \$1.6 million. The derivation of the customer charge is addressed at Exhibit C, Tab 2, Schedule 4, page 1, paragraph 2.

<u>Rate Class</u>	<u>Implementation Costs</u>	<u>Implementation Date</u>	<u>NGEIR Board Order</u>	<u>2007 Board Order</u>
Rate 125 Distribution Service Load Balancing	\$50 / month	Fiscal 2007 January 1, 2008	2006 Cost Allocation 2006 Cost Allocation	2007 Cost Allocation 2007 Cost Allocation
Rate 316 Storage Deliverability	\$50 / month	January 1, 2008	2006 Cost Allocation	2007 Cost Allocation
Rate 300 Distribution Service Load Balancing	\$50 / month	Fiscal 2007 Fiscal 2007	2006 Cost Allocation 2006 Cost Allocation	2007 Cost Allocation 2007 Cost Allocation
Rate 315 Storage Service	\$50 / month	Fiscal 2007	2006 Cost Allocation	2007 Cost Allocation

Also, please refer to Undertaking response #26.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #45

UNDERTAKING

TO PROVIDE a version of the Rate Schedule for Rate 125 which highlights all of changes from the current Board-Approved Rate 125. (Tr. 185, April 27, 2006)

RESPONSE

The attached copy of the Rate 125 rate schedule indicates the changes from the current Board-Approved Rate 125 in bold and underlined text.

RATE NUMBER:	125	EXTRA LARGE FIRM TRANSPORTATION SERVICE
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APPLICABILITY:

To any Applicant who enters into a Service Contract with the Company to use the Company's natural gas distribution network for the transportation, to a single terminal location ("Terminal Location"), of a specified maximum daily volume (Contract Demand) of natural gas of not less than 600,000 cubic metres. **The Service under this rate requires Automatic Meter Reading (AMR) capability.**

CHARACTER OF SERVICE:

Service shall be firm except for events specified in the Service Contract including force majeure.

For Non-Dedicated Service the Contract Demand shall be 24 times the Hourly Demand and the Applicant shall not exceed the Hourly Demand.

For Dedicated Service the monthly demand charges payable shall be based on the billing contract demand specified in the Service Contract. The Applicant shall not exceed an hourly flow calculated as 1/24th of the Contract Demand specified in the Service Contract.

DISTRIBUTION RATES:

The following rates and charges, as applicable, shall apply for deliveries to the Terminal Location.

<u>Monthly Customer Charge</u>	<u>\$550</u>
Demand Charge	
Per cubic metre of Contract Demand per month	<u>9.2021 ¢/m³</u>
Direct Purchase Administration Charge	<u>\$50.00</u>
Forecast Unaccounted For Gas Percentage	<u>0.3%</u>

Monthly Minimum Bill: The Monthly Customer Charge plus the Monthly Contract Demand Charge.

TERMS AND CONDITIONS OF SERVICE:

1. To the extent that this Rate Schedule does not specifically address matters set out in PARTS III and IV of the Company's **HANDBOOK OF RATES AND DISTRIBUTION SERVICES** then the provisions in those Parts shall apply, as contemplated therein, to service under this Rate Schedule.

2. **Unaccounted for Gas (UFG) Adjustment Factor:**

The Applicant is required to deliver to the Company on a daily basis the sum of: (a) the volume of gas to be delivered to the Applicant's Terminal Location; and (b) a volume of gas equal to the forecast unaccounted for gas percentage as stated above multiplied by (a). In the case of a Dedicated Service, the Unaccounted for Gas volume requirement is not applicable.

3. **Nominations:**

Customer shall nominate gas delivery daily based on the gross commodity delivery required to serve the customer's daily load plus the UFG. Customers may change daily nominations based on the nomination windows within a day as defined by the customer contract with TransCanada PipeLines (TCPL) or Union Gas Limited.

Schedule of nominations under Rate 125 has to match upstream nominations. This rate does not allow for any more flexibility than exists upstream of the EGD gas distribution system. Where the customer's nomination does not match the confirmed upstream nomination, the nomination will be confirmed at the upstream value.

Customer may nominate gas to a contractually specified Primary Delivery Area that may be EGD's Central Delivery Area (CDA) or EGD's Eastern Delivery Area (EDA). The Company may accept deliveries at a Secondary Delivery Area such as Dawn, at its sole discretion. Quantities of gas nominated to the system cannot exceed Contract Demand, unless Make-up Gas or Authorized Overrun is permitted.

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RATE NUMBER: **125**

Customers with multiple Rate 125 contracts within a Primary Delivery Area may combine nominations subject to system operating requirements and subject to the Contract Demand for each Terminal Location. For combined nominations the customer shall specify the quantity of gas to each Terminal Location and the order in which gas is to be delivered to each Terminal Location. The specified order of deliveries shall be used to administer Load Balancing Provisions to each Terminal Location. When system conditions require delivery to a single Terminal Location only, nominations with different Terminal Locations may not be combined.

4. Authorized Demand Overrun:

The Comapay may, at its sole discretion, authorize consumption of gas in excess of the Contract Demand for limited periods within a month, provided local distribution facilities have sufficient capacity to accommodate higher demand. In such circumstances, customer shall nominate gas delivery based on the gross commodity delivery (the sum of the customer's Contract Demand and the authorized overrun amount) required to serve the customer's daily load, including quantities of gas in excess of the Contract Demand, plus the UFG. In the event that gas usage exceeds the gas delivery on a day where demand overrun is authorized, the excess gas consumption shall be deemed Supply Overrun Gas. Such service shall not exceed 5 days in any contract year. Based on terms of Service Contract, requests beyond 5 days will constitute a request for a new Contract Demand level with retroactive charges. The new Contract Demand level may be restricted by the capability of the local distribution facilities to accommodate higher demand.

Automatic authorization of transportation overrun will be given in the case of Dedicated Service to the Terminal Location provided that pipeline capacity is available and subject to a maximum volume as specified in the Service Contract.

Authorized Demand Overrun Rate **0.30 ¢/m³**

The Authorized Demand Overrun Rate may be applied to commissioning volumes at the Company's sole discretion, for a contractual period of not more than one year, as specified in the Service Contract.

5. Unauthorized Demand Overrun:

Any gas consumed in excess of the Contract Demand and/or maximum hourly flow requirements, if not authorized, will be deemed to be Unauthorized Demand Overrun gas. Unauthorized Demand Overrun gas may establish a new Contract Demand effective immediately and shall be subject to a charge equal to 120 % of the applicable monthly charge for twelve months of the current contract term, including retroactively based on terms of Service Contract. Based on capability of the local distribution facilities to accommodate higher demand, different conditions may apply as specified in the applicable Service Contract. Unauthorized Demand Overrun gas shall also be subject to Unauthorized Supply Overrun provisions.

6. Unauthorized Supply Overrun:

Any volume of gas taken by the Applicant on a day at the Terminal Location which exceeds the sum of:

- i. any applicable Load Balancing Provision pursuant to **Rate 125**, plus
- ii. the volume of gas delivered by the Applicant on that day shall constitute Unauthorized Supply Overrun Gas.

The Company may also deem volumes of gas to be Unauthorized Supply Overrun gas in other circumstances, as set out in the Load Balancing Provisions of Rate 125.

Any gas deemed to be Unauthorized Overrun gas shall be purchased by the customer at a price (Pe), which is equal to 150% of the highest price in effect for that day as defined below.**

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RATE NUMBER: **125**

7. Unauthorized Supply Underrun:

Any volume of gas delivered by the Applicant on any day in excess of the sum of:

- i. any applicable Rate 125 Load Balancing Provision pursuant to Rate 125, plus
- ii. the volume of gas taken by the Applicant at the Terminal Location on that day shall be classified as Supply Underrun Gas.

The Company may also deem volumes of gas to be Unauthorized Supply Underrun gas in other circumstances, as set out in the Load Balancing Provisions of Rate 125.

Any gas deemed to be Unauthorized Supply Underrun Gas shall be purchased by the Company at a price (P_u) which is equal to fifty percent (50%) of the lowest price in effect for that day as defined below**.

$$P_e = (P_m * E_r * 100 * 0.03769 / 1.054615) * 1.5$$

P_m = highest daily price in U.S. \$/mmBtu published in the Gas Daily, a Platts Publication, for that day under the column "Absolute", for the Niagara export point if the terminal location is in the CDA delivery area, and the Iroquois export point if the terminal location is in the EDA delivery area.

E_r = Noon day spot exchange rate expressed in Canadian dollars per U.S. dollar for such day quoted by the Bank of Canada in the following days Globe & Mail Publication.

1.054615 = Conversion factor from mmBtu to GJ.

0.03769 = Conversion factor from GJ to cubic metres.

** where the price P_u expressed in cents / cubic metre is defined as follows:

$$P_u = (P_l * E_r * 100 * 0.03769 / 1.054615) * 0.5$$

P_l = lowest daily price in U.S. \$/mmBtu published in the Gas Daily, a Platts Publication, for that day under the column "Absolute", for the Niagara export point if the terminal location is in the CDA delivery area, and the Iroquois export point if the terminal location is in the EDA delivery area.

Term of Contract:

A minimum of one year. A longer-term contract may be required if incremental contracts/assets/facilities have been procured/built for the customer. Migration from an unbundled rate to bundled rate may be restricted subject to availability of adequate transportation and storage assets.

Right to Terminate Service:

The Company reserves the right to terminate service to customers served hereunder where the customer's failure to comply with the parameters of this rate schedule, including the load balancing provisions, jeopardizes either the safety or reliability of the gas system. The Company may, in its sole discretion, provide notice to the customer of such termination; however, no notice is required to alleviate emergency conditions.

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RATE NUMBER: **125**

LOAD BALANCING PROVISIONS:

Load Balancing Provisions shall apply at the customer's Terminal Location or at the location of the meter installation for a customer served from a dedicated facility. In the event of an imbalance any excess delivery above the customer's actual consumption or delivery less than the actual consumption shall be subject to the Load Balancing Provisions.

Definitions:

Aggregate Delivery:

The Aggregate Delivery for a customer's account shall equal the sum of the confirmed nominations of the customer for delivery of gas to the applicable delivery area from all pipeline sources.

Applicable Delivery Area:

The Applicable Delivery Area for each customer shall be specified by contract as a Primary Delivery Area. Where system-operating conditions permit, the Company, in its sole discretion, may accept a Secondary Delivery Area as the Applicable Delivery Area by confirming the customer's nomination of such area. Confirmation of a Secondary Delivery Area for a period of a gas day shall cause such area to become the Applicable Delivery Area for such day. Where delivery occurs at both a Terminal Location and a Secondary Delivery Area on a given day, the sum of the confirmed deliveries may not exceed Contract Demand, unless Demand Overrun and/or Make-up Gas is authorized.

Primary Delivery Area:

The Primary Delivery Area shall be delivery area such as EGD's Central Delivery Area (CDA) or EGD's Eastern Delivery Area (EDA).

Secondary Delivery Area:

A Secondary Delivery Area may be a delivery area such as Dawn where the Company, at its sole discretion, determines that operating conditions permit gas deliveries for a customer.

Actual Consumption:

The Actual Consumption of the customer shall be the metered quantity of gas consumed at the customer's Terminal Location or in the event of combined nominations at the Terminal Locations specified.

Net Available Delivery:

The Net Available Delivery shall equal the Aggregate Delivery times one minus the annually determined percentage of Unaccounted for Gas (UFG) as reported by the Company.

Daily Imbalance:

The Daily Imbalance shall be the absolute value of the difference between Actual Consumption and Net Available Delivery.

Cumulative Imbalance (also referred to as Banked Gas Account):

The Cumulative Imbalance shall be the sum of the difference between Actual Consumption and Net Available Delivery since the date the customer last balanced or was deemed to have balanced its cumulative imbalance account.

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RATE NUMBER: **125**

Maximum Contractual Imbalance:

The Maximum Contractual Imbalance shall be less than or equal to 60% of the customer's Contract Demand.

Winter and Summer Seasons:

The winter season shall commence on the date that the Company provides notice of the start of the winter period and conclude on the date that the Company provides notice of the end of the winter period. The summer season shall constitute all other days.

Operational Flow Order:

An Operational Flow Order (OFO) shall constitute an issuance of instructions to protect the operational capacity and integrity of the Company's system, including distribution and/or storage assets, and/or connected transmission pipelines.

Circumstances that would call for an OFO would include but not be limited to:

- . Capacity constraint on the system, or portions of the system, or upstream systems, that are fully utilized;**
- . Conditions where the potential exists that forecasted system demand plus reserves for short notice services provided by the Company and allowances for power generation customers' balancing requirements would exceed facility capabilities and/or provisions of 3rd party contracts;**
- . Pressures on the system or specific portions of the system are too high or too low for safe operations;**
- . Storage system constraints on capacity or pressure or caused by equipment problems resulting in limited ability to inject or withdraw from storage;**
- . Pipeline equipment failures and/or damage that prohibits the flow of gas;**
- . Any and all other circumstances where the potential for system failure exists.**

Daily Balancing Fee:

On any day where the customer has a Daily Imbalance the customer shall pay a Daily Balancing Fee equal to:

(Tier 1 Quantity X Tier 1 Fee) + (Tier 2 Quantity X Tier 2 Fee) + (Applicable Penalty Fee for Imbalance in excess of the Maximum Contractual Imbalance X the amount of Daily Imbalance in excess of the Maximum Contractual Imbalance)

Where Tier 1 and 2 Fees and Quantities are set forth as follows:

Tier 1 = .885 cents/m3 applied to Daily Imbalance of greater than 2% but less than 10% of the Maximum Contractual Imbalance

Tier 2 = 1.062 cents/m3 applied to Daily Imbalance of greater than 10% but less than the Maximum Contractual Imbalance

In addition for Tier 2, instances where the Daily Imbalance represents an under delivery of gas during the winter season shall constitute Unauthorized Supply Ovrerrun Gas for all gas in excess of 10% of Maximum Contractual Imbalance. Where the Daily Imbalance represents an over delivery of gas during the summer season, the Company reserves the right to deem as Unauthorized Supply Underrun Gas for all gas in excess of 10% of Maximum Contractual Imbalance. The Company will issue a 24-hour advance notice to customers of its intent to impose cash out for over delivery of gas during the summer season.

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RATE NUMBER: **125**

The customers shall also pay any Load Balancing Agreement (LBA) charges imposed by the pipeline on days when the customer has a Daily Imbalance provided such imbalance matches the direction of the pipeline imbalance. LBA charges shall first be allocated to customers served under Rates 125 and 300. The system bears a portion of these charges only to the extent that the system incurs such charges based on its operation excluding the operation of customers under Rates 125 and 300. In that event, LBA charges shall be prorated based on the relative imbalances.

Customer's Actual Consumption cannot exceed Net Available Delivery when the Company issues an Operational Flow Order in the winter. Net nominations must not be less than consumption at the Terminal Location. Any negative Daily Imbalance on a winter Operational Flow Order day shall be deemed to be Unauthorized Supply Overrun. Customer's Net Available Delivery cannot exceed Actual Consumption when the Company issues an Operational Flow Order in the summer. Actual Consumption must not be less than net nomination at the Terminal Location. Any positive Daily Imbalance on a summer Operational Flow Order day shall be deemed to be Unauthorized Supply Underrun.

The Company will waive Daily Balancing Fee and Cumulative Imbalance Charge on the day of an Operational Flow Order if the customer used less gas than the amount the customer delivered to the system during the winter season or the customer used more gas than the amount the customer delivered to the system during the summer season. The Company will issue a 24-hour advance notice to customers of Operational Flow Orders and suspension of Load Balancing Provisions.

Cumulative Imbalance Charges:

Customers may trade Cumulative Imbalances within a delivery area. Customers may also title transfer gas from their Cumulative Imbalances Account (Banked Gas Account) into a Rate 316 storage account of the customer provided that the customer has space available in the storage account to accommodate the transfer.

Customers shall be permitted to nominate Make-up Gas, subject to operating constraints, provided that Make-up Gas plus Aggregate Delivery do not exceed Contract Demand. The Company may, on days with no operating constraints, authorize Make-up Gas that, in conjunction with Aggregate Delivery, exceeds Contract Demand.

The customer's Cumulative Imbalance cannot exceed its Maximum Contractual Imbalance. In the event that the customer cannot title transfer gas from their Cumulative Imbalances Account (Banked Gas Account) in whole or in part to storage the Company shall deem the excess imbalance to be Unauthorized Overrun or Underrun gas, as appropriate.

The Cumulative Imbalance Fee shall be equal to of 1.895 cents/m³ per unit of imbalance.

In addition, on any day that the Company declares an Operational Flow Order, negative Cumulative Imbalances greater than 10 % of Maximum Contractual Imbalance in the winter season shall be deemed to be Unauthorized Overrun Gas. The Company reserves the right to deem positive Cumulative Imbalances greater than 10% of Maximum Contractual Imbalance in the summer season as Unauthorized Supply Underun Gas. The Company will issue a 24-hour advance notice to customers of Operational Flow Orders including cash out instructions for Cumulative Imbalances greater than 10 % of Maximum Contractual Imbalance.

EFFECTIVE DATE:

To apply to bills rendered for gas service provided on and after January 1, 2007. This rate schedule is effective January 1, 2007

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