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2006-04-17

VIA EMAIL and COURIER

Mr. John Zych
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Dear Mr. Zych:

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

As per Procedural Order No. 4 dated March 23, 2006 attached please find ten copies of Enbridge Gas Distribution Inc's. Undertakings in the above mentioned proceeding given during the Technical Conference on April 6, 2006.

Yours truly,

A handwritten signature in black ink, appearing to read 'David Stevens', written over the typed name and title.

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 #1

UNDERTAKING

To provide, on a best efforts basis, a breakdown of the system changes and processes costs for each of the functionalities needed for unbundled services, and advise which of the functionalities would be of benefit to some or all customers. (Tr. 68, April 6, 2006)

RESPONSE

Please see the attached chart which contains the requested information in response to this Undertaking.

Requirement	Who Benefits?		LOW	HIGH
	Unbundled	Bundled		
Contract Management			698,120	1,196,776
MSA			14,189	24,325
Terminate all unbundled contracts once MSA is terminated. Accounts will not move to System Gas	X			
Pool Management			85,137	145,948
Special pools need to be created which will have only unbundled rates	X			
Unbundled pools should not be picked up for MDV calculation	X			
MDV reestablishment not available for unbundled pools	X			
FT election not available for unbundled pools	X			
FT turnback and assignment not calculated for unbundled pools	X			
LVC			42,568	72,974
LVC Access to EnTRAC is for the viewing of consumption information only	X	X		
Adding/Editing LVC relationships - Rates 125, 300, 305, 315, 316 to be added. Rate 100, 110, 115, 125, 135, 145, 170, 300, 305, 315, 316 all exist under the same customer	X			
LV Distribution & Storage Contracting			320,681	549,739
Need functionality to enter contractual parameters for unbundled contracts and storage contracts	X			
Setup storage contracts under an MSA with the appropriate parameters (deliverability, ratchets, etc)	X			
Need functionality to create unbundled contracts and storage contracts from a downloadable csv	X			
Renewal of distribution + storage contract including roll over	X			
Termination and early termination	X			
Unbundled distribution rates cannot be combos. However an account can have a rate 125 and a rate 316 contract simultaneously	X			
Search parameters need to change for unbundled rates and storage contracts	X			
Account/Consumer Management			56,758	97,293
Pool account association needs to happen for these contract to pool association. An account on unbundled rate will move only to pools specially designated for unbundled rates	X			
Move account across pools for same MSA (customer mobility) only from an unbundled pool to another unbundled pool	X			
Unbundled customers can be quasi added any time	X			
Accounts with unbundled rate contracts cannot have price point groups	X			
Need to allow unbundled customers to move from pool to pool under different vendors. (Assuming GDAR will mandate this). Customers cannot move from a unbundled pool to a bundled pool or vice-versa	X			
Move account across pools for same MSA (customer mobility) only from an unbundled pool to another unbundled pool	X			
Unbundled customers cannot move to System Gas	X			
Unbundled customers cannot submit billing option STRs	X			
Security Deposit			93,650	160,543
Need to enter/store security deposit at an MSA level and calculate exposure as more contracts get added	X			
Ability to view auto calculated security deposit, amount held by Enbridge, and tolerance percentages	X			
Need the messaging functionality for tracking the security exposure (notifications to MSA and internal users on change of deposit)	X			
Ability to specify thresholds for security deposit	X			
Need to have security requirement validation as STRs are received (need to calculate security exposure per MSA as more contracts get added)	X			

Billing Demand Volumes			0	
Need to view the reestablished contract demand (if the consumption goes more than the contract demand)	X			
Data Migration			85,137	145,948
Existing rate 300 customers to be migrated from spreadsheets	X			
GM			1,211,777	2,077,332
Nomination/Load Balancing			525,009	900,015
- Changes to nomination screens for nominations from storage contracts (this will be a separate screen) - Changes to nomination screen to support multiple nomination windows - Ability to maintain storage capacity left for each of the storage contract (based on ratchets) including updates to deliverability level for storage contracts - Removal of rules corresponding to MDV - Addition of fields to accommodate for UFG, etc - Need to calculate storage fuel volume; may need to include fuel for transport noms - Need a way of allowing secondary delivery points through EnTRAC - No editing functionality. Replace by overriding the existing nom - Need to calculate storage fuel volume; may need to include fuel for transport noms.	X			
No automatic notification for unbundled nominations to MSA if 7 calendar days to flow date and nomination has not been submitted)	X			
Change to fuel ratio screen to accommodate storage, transport & UFG as well	X			
New interface to submit nom info to Altra on a real-time basis. Need to split this at an account level if FTSN comes into play	X	X		
Ability to query nominations ahead of time	X	X		
- changes to allowances for nominations from bga's	X			
- Ability to refresh BGA (instantly in the event of a nom and also whenever consumption & delivery info are received) - Ability to view storage contract balance -Ability to show cumulative imbalance on a daily basis	X			
-Ability to title transfer between storage contracts (factoring in deliverability levels) - Ability to TT from unbundled bga to a bundled pool and vice versa - Ability to submit half a title transfer transaction for cross-franchise transfers	X	X		
Bulletin board for title transfers	X	X		
Ability to override Load Balancing request transactions that violate business rules.	X			
Delivery			86,555	148,381
Delivery proration at an account level based on proration logic	X			
Delivery confirmation report	X			
Consumption			45,406	77,839
New interface to poll the metrotek ftp server for hourly consumptions	X	X		
Non-Compliance			156,084	267,572
-Automatic gas sale/purchase for accounts having excess daily imbalance - Automatic gas sale/purchase for accounts having excess cumulative imbalance	X			
Ability to flag failure to deliver volumes into relevant charges (UOG-Supply, UDC) at a pool level. Changes based on rules.	X			
Prior Period Adjustments			85,137	145,948

Ability to apply PPAs and delivery adjustment to the imbalance of an account				
Ability to recalculate non-compliance volumes and charges due to consumption and delivery adjustments	X			
Potential requirement to update the imbalance of an account				
BGA Disposition			190,138	325,951
- Reporting ability at an account level potentially on a daily basis	X			
- Ability to show storage contract balance	X			
- Reporting storage balance	X			
Gas purchase/sale initiated by MSA at a pool level. Change to do at an account level. Changes based on rules.	X			
Automatic title-transfer into current year's BGA at a pool level. Automatic rollover to the renewed contract term	X			
OFO			123,448	211,625
Ability to manage OFO days. Setup would be similar to curtailment events and will only apply to unbundled rates. Impact would be to business rules in various nomination/load balancing transactions	X			
Charges and Reconciliation			212,841	364,871
Rate management	X			
Remittance reports	X	X		
ABC balance adjustment				
Prior Period Adjustments	X			
Ability to recalculate non-compliance charges due to consumption and delivery adjustments	X			
Misc. Adjustments	X			
Common			184,462	316,221
Security Roles	X			
Navigation, Sitemap	X			
FAQs/Help/Terms & Conditions	X			
Homepages	X			
EI Resequencing	X			
Grand Total			2,307,200	3,955,200

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #2

UNDERTAKING

To provide the results, on a rate-class basis, of an allocation of the estimated system and process costs to offer unbundled rates using the Board-approved methodology for allocation of EnTrac and GDAR costs. (Tr. 70, April 6, 2006)

RESPONSE

As outlined at Exhibit B, Tab 3, Schedule 3, Page 2, the anticipated capital expenditures for system and process costs as these relate to EnTrac enhancements are estimated to be \$2.3 to \$4.0 million with annual operating costs of \$0.3 million to \$0.5 million. Assuming the high end of \$4.0 million with operating costs of \$0.4 million, the annual revenue requirement would be approximately \$1.6 million.

The Board approved methodology relating to the allocation and recovery of EnTrac costs is based on 50% volumetric allocation and 50% customer numbers. Based on the 2006 Board Approved allocation factor and assuming the existing bundled rate classes, the incremental \$1.6 million would be allocated as follows:

	<u>Total</u>	<u>Rate 1</u>	<u>Rate 6</u>	<u>Rate 9</u>	<u>Rate 100</u>	<u>Rate 110</u>	<u>Rate 115</u>	<u>Rate 125</u>	<u>Rate 135</u>	<u>Rate 145</u>	<u>Rate 170</u>	<u>Rate 200</u>	<u>Rate 300</u>
Revenue Requirement (\$)	1,558,200	1,010,186	270,030	612	91,902	42,073	65,172	-	3,508	16,030	48,861	9,827	-
Percentage Recovery	100.0%	64.8%	17.3%	0.0%	5.9%	2.7%	4.2%	0.0%	0.2%	1.0%	3.1%	0.6%	0.0%

The Board approved methodology relating to the allocation and recovery of the GDAR deferral account costs is based on 100% customer numbers. Based on the 2006 Board Approved allocation factor and assuming the existing bundled rate classes, the incremental \$1.6 million would be allocated as follows:

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #3

UNDERTAKING

To advise whether Enbridge Gas Distribution could accommodate an arrangement whereby an underground title transfer from a 1.2 percent deliverability customer to a 10 percent customer would take place with the 10 percent customer receiving the equivalent of that 1.2 percent deliverability, with the transfer being treated as an underground transfer. (Tr. 140, April 6, 2006)

RESPONSE

At Exhibit C, Tab 4, Schedule 1, page 7, paragraph 18, Enbridge Gas Distribution outlines the proposal for title transfer of gas in storage. The Company's position is that transfers between customers who have the same contract parameters, and who are at the same ratchets, can occur underground.

The Company assumes that this Undertaking refers to underground transfers between customers who have different contract parameters and/or are at different ratchet points.

Under these conditions it is not possible to treat the proposed transaction as an underground transfer, for the following reasons.

Administrative Considerations

From an administrative standpoint it could be an extremely complex task to break the transfers into subsets of the contract (i.e., to track a portion of a 10% deliverability contract that only is entitled to 1.2% deliverability) and, in effect, track how much inventory is held under each of many storage agreements. Administrative ease and efficiency would only exist for a few such transactions, after which it becomes very complicated to track the balances and rights of many different customers, and coordinate these rights with the way in which the system is operated.

Operational Considerations

Operational considerations are of the greatest significance to the posed question. Scenarios could easily develop that make it impossible for the storage system to honour the transfers without advance planning and cost that is in excess of any administrative cost. The reason for this is that it is possible that a 10% deliverability customer could receive an underground transfer of gas at 1.2% for a number of days and then, having accumulated these rights over a number of days the customer could, within its 10% deliverability rights, nominate for a withdrawal of up to 10%, all on one day. This situation gives rise to a physical restriction that is best illustrated in the following example:

Customer A has a contract for 1000 units of space at 10% maximum daily deliverability (100 units), with a current inventory balance of 0. Assume that Customer A received a transfer of 12 units per day from Customer B by way of an underground transfer transaction, for 8 consecutive days. At the end of Day 8 Customer A would have a total balance of 96 units in inventory. Assume further that on Day 9 Customer A nominates to withdraw the full 96 units on that day. If this volume of gas has been transferred underground (transactionally) but is still residing (physically) in a part of the storage system which would serve only 1.2% deliverability, it would be physically impossible to meet the customer's entitled nomination on Day 9.

The solution to the example, of course, is to assume that the transaction takes place above ground and that there is an allowance for the fact that there are costs (such as system set-up and compression) in addition to administrative costs, that are necessary to effect the transaction.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #4

UNDERTAKING

To provide the number of and length of contracts Enbridge Gas Distribution has with Union in relation to the Tecumseh storage capacity, including the expiry date for each contract. (Tr. 154, April 6, 2006)

RESPONSE

At Exhibit B, Tab 1, Schedule 1, page 8 , paragraph 13 of , it states that Enbridge Gas Distribution has 6.7 Bcf of capacity under contract with Union Gas at Tecumseh. The 6.7 Bcf contracted with Union Gas is made up of two contracts, as follows;

- 1) A 5.7 Bcf contract relating to capacity that is owned by Union Gas. Union Gas has partial ownership in one of the storage pools which is operated by Enbridge Gas Distribution and the contract in place relates to a transmission and compression service that Enbridge Gas Distribution provides to Union Gas for this capacity. This service agreement came into effect on April 1, 1989 and is automatically renewed for successive ten year terms.
- 2) A 1 Bcf contract for storage, transmission, and compression service with Union Gas. This contract is based on an agreement that was originally in place between The Consumers' Gas Company Ltd. and Centra Gas Ontario for the ownership, development, and operations of a small pool which Enbridge Gas Distribution developed and operates but in which Centra owned the storage rights. It has been in place with Union Gas since the date of Union Gas' acquisition of Centra Gas Ontario. The contract came into effect on May 30, 1994 for a ten year term with automatic renewals for successive ten year terms.

These service agreements are under cost of service arrangements reflecting the ownership position which Union Gas has in this capacity. The services which Enbridge Gas Distribution provides to Union Gas are covered under Board approved Rate 325 (Transmission, Compression, and Pool Storage service).

As a result of the above contracts, Enbridge Gas Distribution has access to approximately 91.3 Bcf of annual turnover capacity at the Tecumseh facility.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #5

UNDERTAKING

To provide a cost estimate, setting out whatever assumptions are used, for a bundled-rate customer to transport 50 units for storage in Michigan, store it, then return it to the CDA for consumption; that is to make the service the same as what they receive from Enbridge Gas Distribution under the bundled service. (Tr. 167, April 6, 2006)

RESPONSE

For the purpose of responding to this undertaking, the following assumptions are used:

Route TCPL to GLGT to TCPL CDA (\$US/mmbtu)	
1. TCPL to Emerson (\$.334622 CAD/GJ and 1.91% fuel)=	\$ 0.4615
2. GLGT to Michcon (assume Emerson to Belle River)	\$ 0.7364
3. MichCon Storage Demand =	\$ 1.8500
4. MichCon Transport (\$.042/mcf into and out of Storage)	\$ 0.0800
5. MichCon Fuel (1.42% into and out of storage)	\$ 0.2269
6. GLGT to St. Clair = \$.17060+ .56486% fuel =	\$ 0.2157
7. GLGT direct from Emerson to St. Clair = \$.338+ 4.65107% fuel	\$ 0.7364
8. Union C1 St. Clair to Dawn (.0345 CAD/GJ +.431% fuel)=	\$ 0.0663
9. TCPL Dawn to CDA = \$.12027 CAD/GJ + .45% =	\$ 0.1470
A. Transport from AECO to Michigan = 1+ 2 + 1/2*(4+5)	\$ 1.351
B. Transport from Michigan to CDA = 1/2*(4+5)+6+8+9	\$ 0.582
C. Michigan Storage Demand = 3	\$ 1.850
D. Michigan Inj and W/D Costs = 4+5	\$ 0.307
E. Transport from AECO to CDA via GLGT = 1+7+8+9	\$ 1.411

This table assumes that:

- i) All of the transportation and fuel costs are based on current posted tolls and fuel ratios;
- ii) The cost of Michigan storage has been estimated based on the average of the summer/winter spreads for the next three years; and
- iii) AECO has been assumed as a commodity rate for all fuel, using the current three year NYMEX and AECO Basis costs. This fuel can be acquired at the receipt point for each leg of transport.

In addition, for the purpose of developing a response to the requested scenario it is also assumed that:

- i) The unit of measure to be used is MMBTUs;
- ii) 4,167 MMBTU of Michigan storage capacity would be required to provide 50 MMBTU of deliverability, assuming conventional deliverability of 1.2% (50 /1.2%); and
- iii) The gas is injected in storage on one day and then removed the next day.

Based on these assumptions, the cost of the delivering 100 MMBTU to the CDA excluding commodity costs using 50 MMBTU from storage in Michigan and 50 MMBTU delivered directly is (in \$US/MMBTU):

50 MMBTU to Michigan Storage = 50*A	\$67.55
Storage Cost = 4,167*C/365*2 days + 50*D	57.59
50 MMBTU from Michigan Storage to CDA = 50*B	29.10
50 MMBTU from AECO to CDA through GLGT = 50*E	<u>70.55</u>
Total	\$224.79

It is important to recognize that this is only an example of one potential path of moving gas through Michigan storage to balance loads within the franchise area. Transportation could also be arranged from Chicago through Vector to storage and then to the market. The example also assumes that 50% of the load needs to be balanced almost daily and does

not take into consideration any optimization that the customer may do with the various transportation paths and storage capacity on days where this level of load balancing may not be required.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #6

UNDERTAKING

To provide the emergency operating characteristics of a power generator the size of Goreway. (Tr. 185, April 6, 2006)

RESPONSE

To determine the emergency operating characteristics of a power generator the size of Goreway, we use the following assumptions:

- The generator is an 880 MW in combined cycle plant which can deliver 500 MW in simple cycle mode, based on a widely used technology.
- An emergency situation refers to an unforecasted startup or shutdown where the generator does not have the usual notice from the Independent Electricity System Operator.

Simple Cycle Operation:

The minimum time to start up is estimated at approximately 12 minutes from Full Spin No Load mode to 100%. In other words, the plant can ramp up to a consumption rate of just under 160,000 m³/hr in 12 minutes.

Under a plant shutdown scenario, the worst case is a plant trip; the minimum shutdown period is approximately 14.5 minutes.

Combined Cycle Operation:

The minimum time to start up is estimated at approximately 75 minutes for a hot start. In other words, the plant can ramp up to a consumption rate of just under 190,000 m³/hr in 75 minutes.

Under a plant shutdown scenario, the worst case is a plant trip; the minimum shutdown period is approximately 19 minutes.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #7

UNDERTAKING

To provide a cost-based price for Rate 316. (Tr. 203, April 6, 2006)

RESPONSE

The information responding to this Undertaking will be filed as part of Enbridge Gas Distribution's "supplemental information" being filed on April 21, 2006 in response to Procedural Order No. 5 in this proceeding.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #8

UNDERTAKING

To provide the operational assumptions that were made for a 100 megawatt generator that made the Company determine that such a customer would likely be able to take advantage of this Rate 125 service and meet the 600,000 cubic meter minimum volume. (Tr. 210, April 6, 2006)

RESPONSE

Different technologies for generation and thermal recovery may result in different average heat rate for generation plants. The Company has received information and input from potential customers that has validated the estimate of 600,000 cubic meters for such a customer. Specifically, using customer input and their current modeled technologies, we estimate that the contract demand for a 100 MW cogeneration plant to be in the vicinity of 550,000 to 650,000 cubic metres.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING # 9

UNDERTAKING

To advise whether multiple customers with the same gas manager can pool their nominations under Rate 125, assuming they meet all other eligibility criteria. (Tr. 220, April 6, 2006)

RESPONSE

The Company's proposed Rate 125 permits pooling of nominations for a single customer with multiple terminal locations. However, pooling of nominations by independent customers under a single gas manager is not permitted under the Company's proposal. The benefit of pooling nominations between terminal locations for a customer is twofold. A single pooled nomination would be administratively simpler for the customer than multiple nominations. Also, the customer may minimize balancing charges by always deeming certain plants to be in balance with other plants taking imbalance charges.

From the Company's perspective, in the shorter term, such pooling on an extensive scale, as might occur if customers with the same gas manager could pool nominations, could jeopardize revenue recovery and result in cost consequences for bundled customers. In the longer term such an offering may be feasible, subject to:

- Systems and process changes to permit such activities.
- New tariffs and terms and conditions to recognize gas managers as customers rather than agents acting on behalf of customers.
- Unbundling of all rate classes to isolate distribution from balancing services.

Changes of such magnitude were not contemplated under the NGEIR proceeding. Such changes would also jeopardize the availability of unbundled rates for the identified customer groups on a timely basis.

The Company believes that measured steps should be taken toward unbundling and the proposed Rate 125 is an appropriate first step towards allowing customers to do their own balancing and offering a limited balancing service.

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #10

UNDERTAKING

To provide an indicative example, setting out all assumptions used, of the setting of a floor price for Rate 316. (Tr. 234, April 6, 2006)

RESPONSE

To establish the floor price for Rate 316, there are two elements that need to be understood:

1. the value of the storage and deliverability to bundled customers; and
2. the cost of developing storage.

Once each of these elements is known, the higher of these two numbers would be used to establish the floor for the total value that would have to be received from an open bidding process.

Value to Bundled Customers

The value of the storage and deliverability will be determined through the use of the SENDOUT model, which is a portfolio optimization tool that is used by the Company to assess different supply, transportation, and storage alternatives. The value would be determined by comparing the total portfolio cost of the existing supply portfolio with the total portfolio cost of a portfolio that had access to the storage and deliverability being proposed.

Enbridge Gas Distribution maintains a scenario that is reflective of its existing supply portfolio within SENDOUT. This scenario includes all of the transportation and storage contracted for and available to meet the overall supply and load balancing requirements of the Company. The current and anticipated future cost of these transportation and storage options are also captured as assumptions within the model. In addition to these

assumptions, expected demand, commodity costs and modeling parameters around the extent to which certain sources of supply can be used (e.g. peaking contracts, Dawn spot, etc.) are also input into the scenario. All of these inputs provide a base case that reflects the expected costs associated with the current supply portfolio that can be used as a basis for comparison for new supply, transportation, and storage options.

For the purpose of an illustrative example, assume the existing portfolio has a total cost of \$2,000 million.

To understand the value that the incremental storage and deliverability would provide for bundled customers, a new scenario would be developed that would make this storage and deliverability available as an incremental resource to the base case scenario that Enbridge Gas Distribution uses to satisfy its portfolio requirements. By adding a new resource and running SENDOUT, the optimization model will determine if this resource makes more economic sense than other resources included in the model. When assessing supply alternatives these new resources would typically have a cost attached to them, but for the purpose of determining the value to bundled customers, the incremental storage and deliverability would be provided as a “free” resource. By running the model in this manner, the least economic resources used in the base case scenario will be displaced by the new resource. The resulting total portfolio cost that now includes this “free” resource will indicate the value of the new resource to the portfolio. Again, for the purpose of an illustrative example, assume this portfolio which uses the incremental storage and deliverability has a total cost of \$1,998 million.

Based on this illustrative example, the value of the storage and deliverability to existing bundled customers is \$2 million (\$2,000 million - \$1,998 million) as that is the reduction in the portfolio cost achieved from the bundled customers having access to the incremental storage and deliverability.

Cost of Developing Storage

The cost of developing the incremental storage would be determined by looking at the cost of service implications of developing the new storage and deliverability. This would have to factor in the implications of both the capital expenditure and the ongoing operating costs. For the purpose of an illustrative example, assume this has an annual cost of service impact of \$1.0 million.

Summary

Based on the illustrative examples identified above, the floor for the total value that would have to be received from an open bidding process would be:

Maximum of:	
Value of Storage and Deliverability:	
Existing Portfolio Cost	\$2,000 million
Less: New Portfolio	<u>\$1,998 million</u>
Value to Bundled Customers	\$2 million
Cost of Service Impacts	\$1 million
Floor Price	\$2 million

ENBRIDGE GAS DISTRIBUTION UNDERTAKING #11

UNDERTAKING

Response to Undertaking discussed off-line with counsel to APPro. (Tr. 224, April 6, 2006)

RESPONSE

Spreadsheets (found as an attachment to this Undertaking) depicting a power plant's hourly deliveries and demand for four (4) different days were submitted to Enbridge Gas Distribution as an undertaking. The hourly deliveries provided are for the calendar day, not the gas day. Consumption and deliveries are both zero (0) on the day before and the day after each of the four days under consideration.

The Company was requested to determine load balancing charges that a power plant would incur on four (4) different operating days under the current suite of services and under the services proposed in the NGEIR proceeding.

It was further requested that load balancing charges be determined assuming each day is a normal day and an Operational Flow Order (OFO) day.

To respond to this undertaking Enbridge Gas Distribution made further assumptions as follows:

- The customer's max. hourly demand = 4,000 MMBtu = 111,972 m³
- Contract Demand (CD) = 111,972 m³ x 24 = 2,687,328 m³
- Max. Contractual Imbalance (MCI) = 60% of CD.
- MCI = 0.6 x CD = 1,612,397 m³
- Winter season spans from November 15th to April 15th.
- Summer season spans from April 16th to November 14th.

In the following derivation of load balancing charges each of the four scenarios spans over two gas days because the hourly deliveries provided reflect a calendar day. A gas day starts at 10:00 AM and ends at 10:00 AM the next day. This leads to daily and cumulative imbalance charges on two gas days for each scenario (i.e. for Feb. 1st scenario, it would be the Jan. 31st and Feb. 1st gas days, with the first 9 hours on Feb. 1st being Jan. 31st deliveries and consumption).

Load balancing provisions for the proposed service, daily and cumulative imbalance charges, as well as, OFO day provisions reflect Exhibit C, Tab 2, Schedule 2 (proposed tariff for Rate 125) filed in the NGEIR proceeding.

The provisions of the current Rate 125 reflect OEB-approved rates effective April 1, 2006.

Please note that the provisions of the current Rate 125 do not distinguish between a normal day and an Operational Flow Order (OFO) day.

The results for each of the scenarios are summarized in Table 1 below. Detailed calculations for each day are attached and organized in the following manner:

- load balancing charges under the proposed R125 (Normal Day)
- load balancing charges under the proposed R125 (OFO Day)
- load balancing charges under the current R125 (Normal Day = OFO Day).

As the actual gas prices were not provided for the four scenarios, the cash out, for scenarios where cash out occurs, is 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.

Enbridge Gas Distribution would like to emphasize that the load balancing provisions under the proposed R125 encourage customers to act in counter-seasonal manner.

Out of the four submitted scenarios, the customer's behaviour is counter-seasonal for the Feb. 1st scenario only; Jan. 31st and Feb. 1st gas days. For the other three scenarios, the customer's behaviour is seasonal. Consequently, the outcome for the Feb. 1st scenario is significantly more favourable for the customer than for the other three scenarios. This is because the customer's imbalance is subjected to the cash out provisions for May 1st, July 1st and Oct. 1st scenarios, bearing in mind the customer acted in a seasonal manner on each of the three days.

Table 1: Summary of Results

Scenario	Feb. 1st Scenario		May 1st Scenario		July 1st Scenario		Oct. 1st Scenario	
	Jan. 31	Feb. 1	April 30	May 1	June 30	July 1	Sept. 30	Oct. 1
Normal Day								
Daily Imbalance Charges	\$ 2,365	\$ 6,396	\$ 645	\$ 645	\$ 399	\$ 645	\$ 399	\$ 645
Cumulative Imbalance Charges	\$ 8,958	\$ 31,352	\$ 3,225	\$ 6,450	\$ 2,239	\$ 5,464	\$ 2,239	\$ 5,464
Total Imbalance Charges (\$)	\$ 11,323	\$ 37,748	\$ 3,870	\$ 7,095	\$ 2,638	\$ 6,109	\$ 2,638	\$ 6,109
Total Cash Out (m ³)	0	0	62,704	846,508	0	846,508	0	510,592
OFO Day								
Daily Imbalance Charges	n/a	\$ -	n/a	\$ -	n/a	\$ -	n/a	\$ -
Cumulative Imbalance Charges	n/a	\$ 8,958	n/a	\$ 3,225	n/a	\$ 2,884	n/a	\$ 2,884
Total Imbalance Charges (\$)	n/a	\$ 8,958	n/a	\$ 3,225	n/a	\$ 2,884	n/a	\$ 2,884
Total Cash Out (m ³)	n/a	0	n/a	1,007,748	n/a	975,500	n/a	639,584
Current Rate 125								
Banked Gas Account (m ³)	8,958	31,352	4,479	33,592	2,239	33,592	4,479	29,113
Total Cash Out (m ³)	438,930	1,088,368	219,465	974,156	109,733	974,156	107,493	642,719

Notes:

- 1) Total charges on the day consist of total imbalance charges + total cash out.
- 2) Cash out is expressed in m³ as the actual gas prices were not provided for the four scenarios.

The Company would like to highlight that the outcomes for the four scenarios are dependent on compatible upstream services being available (e.g. reservation of capacity, more nomination windows, etc.). The Company would also like to remark that the four scenarios 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.

January 31, 2005

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	
		Pre-Dispatch Signal	MMBtu	Energy Cost	HOEP	MM Btu	Hourly Gas Imbalance				
31-Jan-2005	1	\$48.79	0.00	65.00	\$50.98			0			
31-Jan-2005	2	\$45.89	0.00	65.00	\$48.10			0			
31-Jan-2005	3	\$41.51	0.00	65.00	\$46.92			0			
31-Jan-2005	4	\$41.20	0.00	65.00	\$44.85			0			
31-Jan-2005	5	\$47.64	0.00	65.00	\$42.35			0			
31-Jan-2005	6	\$117.72	4000.00	65.00	\$40.81		4,000	111,972		111,972	
31-Jan-2005	7	\$133.79	4000.00	65.00	\$47.17		4,000	111,972		111,972	
31-Jan-2005	8	\$172.07	4000.00	65.00	\$48.78		4,000	111,972		111,972	
31-Jan-2005	9	\$168.03	4000.00	65.00	\$49.75		4,000	111,972		111,972	
1-Feb-2005	10	\$163.40	0.00	65.00	\$52.32		-	0		0	
1-Feb-2005	11	\$178.71	0.00	65.00	\$53.73		-	0		0	
1-Feb-2005	12	\$159.99	0.00	65.00	\$52.15		-	0		0	
1-Feb-2005	13	\$141.94	0.00	65.00	\$51.21		-	0		0	
1-Feb-2005	14	\$137.23	0.00	65.00	\$53.03		-	0		0	
1-Feb-2005	15	\$136.15	0.00	65.00	\$49.53		-	0		0	
1-Feb-2005	16	\$137.23	0.00	65.00	\$49.10		-	0		0	
1-Feb-2005	17	\$150.44	0.00	65.00	\$46.61		-	0		0	
1-Feb-2005	18	\$193.31	0.00	65.00	\$73.15		-	0	0	0	
1-Feb-2005	19	\$240.71	0.00	65.00	\$83.42		-	0	0	0	
1-Feb-2005	20	\$200.13	0.00	65.00	\$83.39		-	0	0	0	
1-Feb-2005	21	\$193.33	0.00	65.00	\$74.52		-	0	0	0	
1-Feb-2005	22	\$163.98	0.00	65.00	\$52.43		-	0		0	
1-Feb-2005	23	\$130.57	0.00	65.00	\$54.78		-	0		0	
1-Feb-2005	24	\$58.17	0.00	65.00	\$45.36		-	0		0	
						Total for 31-Jan-2005	=	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:	<u>¢ per M3</u>	<u>Tier Charge</u>
Tier 0 - no charge	32,248	0.0 \$	-
Tier 1	128,992	0.5 \$	645
Tier 2	286,648	0.6 \$	1,720
	<u>447,888</u>	\$	<u>2,365</u> = Daily Imbalance Charges on Jan. 31st

Cum Imbalance: ¢ per M3 CI Charge
 447,888 2.0 \$ 8,958 = Cumulative Imbalance Charges on Jan. 31st

Total Charge: \$ 11,323 = Total Imbalance Charges on Jan. 31st

OFO Day: 24-hour notice issued on Jan. 31st for OFO day to take effect on Feb. 1st!

Current Rate 125 (Normal Day = OFO Day):

Delivered Volume	m ³	447,888
2% of Delivered Volume		8,958
Total Imbalance		<u>447,888</u>
Net Imbalance:		438,930

= Supply Underrun Gas.
 EGD orders the customer to dispose of Supply Underrun Gas.
 If customer fails to dispose of Supply Underrun Gas, EGD would purchase Supply Underrun Gas at 50% of the lowest daily index cost of gas.

February 1, 2005

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	Hourly Gas Imbalance					
31-Jan-2005	1	\$48.79	0.00	65.00	\$50.98			0				
31-Jan-2005	2	\$45.89	0.00	65.00	\$48.10			0				
31-Jan-2005	3	\$41.51	0.00	65.00	\$46.92			0				
31-Jan-2005	4	\$41.20	0.00	65.00	\$44.85			0				
31-Jan-2005	5	\$47.64	0.00	65.00	\$42.35			0				
31-Jan-2005	6	\$117.72	4000.00	65.00	\$40.81		4,000	111,972		111,972		
31-Jan-2005	7	\$133.79	4000.00	65.00	\$47.17		4,000	111,972		111,972		
31-Jan-2005	8	\$172.07	4000.00	65.00	\$48.78		4,000	111,972		111,972		
31-Jan-2005	9	\$168.03	4000.00	65.00	\$49.75		4,000	111,972		111,972		
1-Feb-2005	10	\$163.40	4000.00	65.00	\$52.32		4,000	111,972		111,972		
1-Feb-2005	11	\$178.71	4000.00	65.00	\$53.73		4,000	111,972		111,972		
1-Feb-2005	12	\$159.99	4000.00	65.00	\$52.15		4,000	111,972		111,972		
1-Feb-2005	13	\$141.94	4000.00	65.00	\$51.21		4,000	111,972		111,972		
1-Feb-2005	14	\$137.23	4000.00	65.00	\$53.03		4,000	111,972		111,972		
1-Feb-2005	15	\$136.15	4000.00	65.00	\$49.53		4,000	111,972		111,972		
1-Feb-2005	16	\$137.23	4000.00	65.00	\$49.10		4,000	111,972		111,972		
1-Feb-2005	17	\$150.44	4000.00	65.00	\$46.61		4,000	111,972		111,972		
1-Feb-2005	18	\$193.31	4000.00	65.00	\$73.15	4,000		111,972	111,972			
1-Feb-2005	19	\$240.71	4000.00	65.00	\$83.42	4,000		111,972	111,972			
1-Feb-2005	20	\$200.13	4000.00	65.00	\$83.39	4,000		111,972	111,972			
1-Feb-2005	21	\$193.33	4000.00	65.00	\$74.52	4,000		111,972	111,972			
1-Feb-2005	22	\$163.98	4000.00	65.00	\$52.43		4,000	111,972		111,972		
1-Feb-2005	23	\$130.57	4000.00	65.00	\$54.78		4,000	111,972		111,972		
1-Feb-2005	24	\$58.17	0.00	65.00	\$45.36			0				
						Total for	1-Feb-2005	=	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	0.5 \$	645	
Tier 2	958,480	0.6 \$	5,751	
	<u>1,119,720</u>		\$ 6,396	= Daily Imbalance Charges on Feb. 1st

	Cum Imbalance:	¢ per M3	CI Charge	
	447,888	2.0 \$	8,958	= Cumulative Imbalance Charges on Jan. 31st
	1,119,720	2.0 \$	22,394	= Cumulative Imbalance Charges on Feb. 1st
			\$ 31,352	= Total Cumulative Imbalance Charges on Feb. 1st

Total Charge: \$ 37,748 = Total Imbalance Charges on Feb. 1st

OFO Day:

	Tier Imbalance:	¢ per M3	Tier Charge	
Tier 0 - no charge	32,248	0.0 \$	-	
Tier 1	128,992	0.5 \$	-	= Customer over delivered on winter OFO day. Charge waived on Feb. 1st.
Tier 2	958,480	0.6 \$	-	= Customer over delivered on winter OFO day. Charge waived on Feb. 1st.
	<u>1,119,720</u>		\$ -	

	Cum Imbalance:	¢ per M3	CI Charge	
	1,119,720	2.0 \$	-	= Customer over delivered on winter OFO day. Charge waived on Feb. 1st.
	447,888	2.0 \$	8,958	= Cumulative Imbalance Charges Carry Over from Jan. 31st
			\$ 8,958	= Total Cumulative Imbalance Charges on Feb. 1st OFO Day

Total Charge: \$ 8,958 = Total Imbalance Charges on Feb. 1st OFO Day

Current Rate 125 (Normal Day = OFO Day):

Delivered Volume	m ³	1,567,608	
2% of Delivered Volume		31,352	to BGA. The customer's BGA needs to be equal to zero within five (5) days after the end of each month.
Total Imbalance		<u>1,119,720</u>	
Net Imbalance:		1,088,368	= Supply Underrun Gas.

EGD orders the customer to dispose of Supply Underrun Gas.
If customer fails to dispose of Supply Underrun Gas, EGD would purchase Supply Underrun Gas at 50% of the lowest daily index cost of gas.

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

April 30, 2005

Gas Day	HE	Pre-Dispatch Signal	Gas Purchased for MW Produced MMBtu	Energy Cost	HOEP	Gas Consumed when Dispatched MMBtu	Hourly Gas Imbalance	Gas Purchased for MW Produced in M ³	Gas Consumed when Dispatched in M3	Hourly Gas Imbalance in M3		
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	0		
1-May-2005	18	\$107.99	0.00	65.00	\$37.40	-		0	0	0		
1-May-2005	19	\$128.89	0.00	65.00	\$36.01	-		0	0	0		
1-May-2005	20	\$150.00	0.00	65.00	\$36.35	-		0	0	0		
1-May-2005	21	\$128.58	0.00	65.00	\$35.37	-		0	0	0		
1-May-2005	22	\$128.26	0.00	65.00	\$35.22	-		0	0	0		
1-May-2005	23	\$100.68	0.00	65.00	\$35.71	-		0	0	0		
1-May-2005	24	\$66.00	0.00	65.00	\$39.03	-		0	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	0.5 \$	645
Tier 2	62,704	0.6	Cash Out
	223,944	\$	645 = Daily Imbalance Charges on April 30th + Cash Out
Cum Imbalance:	¢ per M3	CI Charge	
161,240	2.0 \$	3,225	= Cumulative Imbalance Charges on April 30th

Total Charge: \$ 3,870 = 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.

OFO Day: 24-hour notice issued on April 30th for OFO day to take effect on May 1st!

Current Rate 125 (Normal Day = OFO Day):

Delivered Volume 223,944
 2% of Delivered Volume 4,479 to BGA. The customer's BGA needs to be equal to zero within five (5) days after the end of each month.
 Total Imbalance 223,944
 Net Balance: 219,465 = Supply Underrun Gas.
 EGD orders the customer to dispose of Supply Underrun Gas.
 If customer fails to dispose of Supply Underrun Gas, EGD would purchase Supply Underrun Gas at 50% of the lowest daily index cost of gas.

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 MMBtu	Energy Cost	HOEP	Gas Consumed when Dispatched Btu	Hourly Gas Imbalance	Gas Purchased for MW Produced in M ³	Gas Consumed when Dispatched in M3	Hourly Gas Imbalance in M3		
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		4,000	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	32,248	0.0 \$	-
Tier 1	128,992	0.5 \$	645
Tier 2	846,508	0.6	Cash Out
	1,007,748	\$	645 = Daily Imbalance Charges on May 1st + Cash Out
Cum Imbalance:	¢ per M3	CI Charge	
	161,240	2.0 \$	3,225 = Cumulative Imbalance Charges on April 30th
	161,240	2.0 \$	3,225 = Cumulative Imbalance Charges on May 1st
		\$	6,450 = Total Cumulative Imbalance Charges on May 1st
Total Charge:	\$	7,095	= Total Imbalance Charges on May 1st + Cash Out
Total Cash Out		846,508	m ³
			EGD reserves the right to cash out excess at 50% of the lowest daily index cost of gas!

OFO Day:

Tier Imbalance:	¢ per M3	Tier Charge	
Tier 0 - no charge	32,248	0.0 \$	-
Tier 1	128,992	0.5	Cash Out
Tier 2	846,508	0.6	Cash Out
	1,007,748	\$	- = Daily Imbalance Charges on May 1st + Cash Out
Cum Imbalance:	¢ per M3	CI Charge	
	32,248		= Cumulative Imbalance on May 1st
	161,240		= Cumulative Imbalance Carry Over from April 30th
	193,488		= Total Cumulative Imbalance on May 1st
10% MCI	161,240	2.0 \$	3,225
Excess	32,248		Cash Out
	193,488	\$	3,225 = Total Cumulative Imbalance Charges on May 1st OFO Day + Cash Out
			Note: Positive cumulative imbalance must not be greater than 10% MCI on summer OFO day.
Total Charge:	\$	3,225	= Total Imbalance Charges on May 1st OFO Day + Cash Out
Total Cash Out		1,007,748	m ³
			EGD reserves the right to cash out excess at 50% of the lowest daily index cost of gas.

Current Rate 125 (Normal Day = OFO Day):

Delivered Volume 1,679,580
 2% of Delivered Volume 33,592 to BGA. The customer's BGA needs to be equal to zero within five (5) days after the end of each month.
 Total Imbalance 1,007,748
 Net Balance: 974,156 = Supply Underrun Gas.
 EGD orders the customer to dispose of Supply Underrun Gas.
 If customer fails to dispose of Supply Underrun Gas, EGD would purchase Supply Underrun Gas at 50% of the lowest daily index cost of gas.

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

Filed: 2006-04-17
 EB-2005-0551
 Undertaking #11
 Attachment
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June 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	MM Btu	Hourly Gas Imbalance				
30-Jun-2005	1	\$52.89	0.00	65.00	\$55.25			0			
30-Jun-2005	2	\$45.81	0.00	65.00	\$44.02			0			
30-Jun-2005	3	\$35.82	0.00	65.00	\$38.14			0			
30-Jun-2005	4	\$33.76	0.00	65.00	\$35.81			0			
30-Jun-2005	5	\$32.40	0.00	65.00	\$36.68			0			
30-Jun-2005	6	\$30.03	0.00	65.00	\$36.85			0			
30-Jun-2005	7	\$36.98	0.00	65.00	\$35.58			0			
30-Jun-2005	8	\$43.08	0.00	65.00	\$39.45			0			
30-Jun-2005	9	\$95.29	4000.00	65.00	\$49.19			0			
1-Jul-2005	10	\$120.29	0.00	65.00	\$63.74			0		0	
1-Jul-2005	11	\$131.14	0.00	65.00	\$72.77	-		0	0		
1-Jul-2005	12	\$132.64	0.00	65.00	\$74.54	-		0	0		
1-Jul-2005	13	\$151.90	0.00	65.00	\$67.33	-		0	0		
1-Jul-2005	14	\$153.27	0.00	65.00	\$68.56	-		0	0		
1-Jul-2005	15	\$153.40	0.00	65.00	\$65.30	-		0	0		
1-Jul-2005	16	\$172.32	0.00	65.00	\$69.77	-		0	0		
1-Jul-2005	17	\$173.41	0.00	65.00	\$46.80	-		0	0	0	
1-Jul-2005	18	\$172.32	0.00	65.00	\$37.40	-		0	0		
1-Jul-2005	19	\$172.32	0.00	65.00	\$36.01	-		0	0		
1-Jul-2005	20	\$172.32	0.00	65.00	\$36.35	-		0	0		
1-Jul-2005	21	\$172.32	0.00	65.00	\$35.37	-		0	0		
1-Jul-2005	22	\$180.22	0.00	65.00	\$35.22	-		0	0		
1-Jul-2005	23	\$153.27	0.00	65.00	\$35.71	-		0	0		
1-Jul-2005	24	\$108.23	0.00	65.00	\$39.03	-		0	0		
						Total for 30-Jun-2005	=	111,972	0	111,972	111,972

Summer 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	0.0 \$	-
Tier 1	0.5 \$	399
Tier 2	0.6 \$	-
111,972		\$ 399 = Daily Imbalance Charges on June 30th

Cum Imbalance: ¢ per M3 CI Charge
 111,972 2.0 \$ 2,239 = Cumulative Imbalance Charges on June 30th

Total Charge: \$ 2,638 = Total Imbalance Charges on June 30th

OFO Day: 24-hour notice issued on June 30th for OFO day to take effect on July 1st!

Current Rate 125 (Normal Day = OFO Day):

Delivered Volume m³ 111,972
 2% of Delivered Volume 2,239 to BGA. The customer's BGA needs to be equal to zero within five (5) days after the end of each month.
 Total Imbalance 111,972
 Net Balance: 109,733 = Supply Underrun Gas.
 EGD orders the customer to dispose of Supply Underrun Gas.
 If customer fails to dispose of Supply Underrun Gas, EGD would purchase Supply Underrun Gas at 50% of the lowest daily index cost of gas.

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

July 1, 2005

Gas Day	HE	Pre-Dispatch Signal	Gas Purchased for MW Produced MMBtu	Energy Cost	HOEP	Gas Consumed when Dispatched MMBtu	Hourly Gas Imbalance	Gas Purchased for MW Produced in M ³	Gas Consumed when Dispatched in M3	Hourly Gas Imbalance in M3		
30-Jun-2005	1	\$52.89	0.00	65.00	\$55.25			0				
30-Jun-2005	2	\$45.81	0.00	65.00	\$44.02			0				
30-Jun-2005	3	\$35.82	0.00	65.00	\$38.14			0				
30-Jun-2005	4	\$33.76	0.00	65.00	\$35.81			0				
30-Jun-2005	5	\$32.40	0.00	65.00	\$36.68			0				
30-Jun-2005	6	\$30.03	0.00	65.00	\$36.85			0				
30-Jun-2005	7	\$36.98	0.00	65.00	\$35.58			0				
30-Jun-2005	8	\$43.08	0.00	65.00	\$39.45			0				
30-Jun-2005	9	\$95.29	4000.00	65.00	\$49.19		4,000	111,972		111,972		
1-Jul-2005	10	\$120.29	4000.00	65.00	\$63.74		4,000	111,972		111,972		
1-Jul-2005	11	\$131.14	4000.00	65.00	\$72.77	4,000		111,972	111,972			
1-Jul-2005	12	\$132.64	4000.00	65.00	\$74.54	4,000		111,972	111,972			
1-Jul-2005	13	\$151.90	4000.00	65.00	\$67.33	4,000		111,972	111,972			
1-Jul-2005	14	\$153.27	4000.00	65.00	\$68.56	4,000		111,972	111,972			
1-Jul-2005	15	\$153.40	4000.00	65.00	\$65.30	4,000		111,972	111,972			
1-Jul-2005	16	\$172.32	4000.00	65.00	\$69.77	4,000		111,972	111,972			
1-Jul-2005	17	\$173.41	4000.00	65.00	\$46.80		4,000	111,972		111,972		
1-Jul-2005	18	\$172.32	4000.00	65.00	\$37.40		4,000	111,972		111,972		
1-Jul-2005	19	\$172.32	4000.00	65.00	\$36.01		4,000	111,972		111,972		
1-Jul-2005	20	\$172.32	4000.00	65.00	\$36.35		4,000	111,972		111,972		
1-Jul-2005	21	\$172.32	4000.00	65.00	\$35.37		4,000	111,972		111,972		
1-Jul-2005	22	\$180.22	4000.00	65.00	\$35.22		4,000	111,972		111,972		
1-Jul-2005	23	\$153.27	4000.00	65.00	\$35.71		4,000	111,972		111,972		
1-Jul-2005	24	\$108.23	4000.00	65.00	\$39.03		4,000	111,972		111,972		
							Total for 1-Jul-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	32,248	0.0 \$	-
Tier 1	128,992	0.5 \$	645
Tier 2	846,508	0.6	Cash Out Customer over delivered. EGD reserves the right to cash out excess at 50% of the lowest daily index cost of gas.
	1,007,748	\$	645 = Daily Imbalance Charges on July 1st + Cash Out
Cum Imbalance:	¢ per M3	CI Charge	
111,972	2.0 \$	2,239	= Cumulative Imbalance Charges on June 30th
161,240	2.0 \$	3,225	= Cumulative Imbalance Charges on July 1st
	\$	5,464	= Total Cumulative Imbalance Charges on July 1st
Total Charge:	\$	6,109	= Total Imbalance Charges on July 1st + Cash Out
Total Cash Out		846,508	m ³

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

OFO Day:

Tier Imbalance:	¢ per M3	Tier Charge	
Tier 0 - no charge	32,248	0.0 \$	-
Tier 1	128,992	0.5	Cash Out Customer over delivered. EGD reserves the right to cash out excess at 50% of the lowest daily index cost of gas.
Tier 2	846,508	0.6	Cash Out Customer over delivered. EGD reserves the right to cash out excess at 50% of the lowest daily index cost of gas.
	1,007,748	\$	- = Daily Imbalance Charges on July 1st OFO Day + Cash Out
Cum Imbalance:	¢ per M3	CI Charge	
32,248	2.0 \$	645	= Cumulative Imbalance Charges on July 1st
111,972	2.0 \$	2,239	= Cumulative Imbalance Charges Carry Over from June 30th
144,220 < 10% MCI	\$	2,884	= Total Cumulative Imbalance Charges on July 1st OFO Day
			Note: Positive cumulative imbalance must not be greater than 10% MCI on summer OFO day.
Total Charge:	\$	2,884	= Total Imbalance Charges on July 1st OFO Day + Cash Out
Total Cash Out		975,500	m ³

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

Current Rate 125 (Normal Day = OFO Day):

Delivered Volume 1,679,580 m³
 2% of Delivered Volume 33,592 to BGA. The customer's BGA needs to be equal to zero within five (5) days after the end of each month.
 Total Imbalance 1,007,748
 Net Balance: 974,156 = Supply Underrun Gas.
 EGD orders the customer to dispose of Supply Underrun Gas.
 If customer fails to dispose of Supply Underrun Gas, EGD would purchase Supply Underrun Gas at 50% of the lowest daily index cost of gas.

September 30, 2005

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				
30-Sep-2005	1	\$43.79	0.00	65.00	\$41.74			0			
30-Sep-2005	2	\$43.53	0.00	65.00	\$39.40			0			
30-Sep-2005	3	\$38.83	0.00	65.00	\$39.23			0			
30-Sep-2005	4	\$37.09	0.00	65.00	\$38.18			0			
30-Sep-2005	5	\$38.31	0.00	65.00	\$39.42			0			
30-Sep-2005	6	\$39.68	0.00	65.00	\$39.74			0			
30-Sep-2005	7	\$46.54	0.00	65.00	\$40.24			0			
30-Sep-2005	8	\$219.90	4000.00	65.00	\$48.58		4,000	111,972		111,972	
30-Sep-2005	9	\$241.15	4000.00	65.00	\$87.02	4,000		111,972	111,972		
1-Oct-2005	10	\$258.19	0.00	65.00	\$143.85	-		0	0		
1-Oct-2005	11	\$241.15	0.00	65.00	\$91.01	-		0	0		
1-Oct-2005	12	\$241.15	0.00	65.00	\$63.48		-	0		0	
1-Oct-2005	13	\$251.39	0.00	65.00	\$57.06		-	0		0	
1-Oct-2005	14	\$241.15	0.00	65.00	\$96.12		-	0	0		
1-Oct-2005	15	\$219.90	0.00	65.00	\$111.04		-	0	0		
1-Oct-2005	16	\$200.00	0.00	65.00	\$68.51		-	0	0		
1-Oct-2005	17	\$217.07	0.00	65.00	\$54.13		-	0		0	
1-Oct-2005	18	\$239.60	0.00	65.00	\$52.98		-	0		0	
1-Oct-2005	19	\$241.15	0.00	65.00	\$77.03		-	0	0		
1-Oct-2005	20	\$240.18	0.00	65.00	\$106.18		-	0	0		
1-Oct-2005	21	\$241.15	0.00	65.00	\$40.06		-	0		0	
1-Oct-2005	22	\$100.00	0.00	65.00	\$40.76		-	0		0	
1-Oct-2005	23	\$55.00	0.00	65.00	\$44.52		-	0		0	
1-Oct-2005	24	\$38.51	0.00	65.00	\$37.01		-	0		0	
						Total for 30-Sep-2005	=	223,944	111,972	111,972	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:	<u>¢ per M3</u>	<u>Tier Charge</u>	
Tier 0 - no charge	32,248	0.0 \$	-	
Tier 1	79,724	0.5 \$	399	
Tier 2	-	0.6 \$	-	
	<u>111,972</u>		<u>\$ 399</u>	= Daily Imbalance Charges on Sept. 30th

	Cum Imbalance:	<u>¢ per M3</u>	<u>CI Charge</u>	
	111,972	2.0 \$	2,239	= Cumulative Imbalance Charges on Sept. 30th

Total Charge: \$ 2,638 = Total Imbalance Charges on Sept. 30th

OFO Day: 24-hour notice issued on Sept. 30th for OFO day to take effect on Oct. 1st!

Current Rate 125 (Normal Day = OFO Day):

	m ³	
Delivered Volume	223,944	
2% of Delivered Volume	4,479	to BGA. The customer's BGA needs to be equal to zero within five (5) days after the end of each month.
Total Imbalance	<u>111,972</u>	
Net Imbalance:	107,493	= Supply Underrun Gas.

EGD orders the customer to dispose of Supply Underrun Gas.
 If customer fails to dispose of Supply Underrun Gas, EGD would purchase Supply Underrun Gas at 50% of the lowest daily index cost of gas.

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

October 1, 2005

Gas Day	HE	Pre-Dispatch Signal	Gas Purchased for MW Produced MMBtu	Energy Cost	HOEP	Gas Consumed when DispatchedMM Btu	Hourly Gas Imbalance	Gas Purchased for MW Produced in M ³	Gas Consumed when Dispatched in M3	Hourly Gas Imbalance in M3		
30-Sep-2005	1	\$43.79	0.00	65.00	\$41.74			0				
30-Sep-2005	2	\$43.53	0.00	65.00	\$39.40			0				
30-Sep-2005	3	\$38.83	0.00	65.00	\$39.23			0				
30-Sep-2005	4	\$37.09	0.00	65.00	\$38.18			0				
30-Sep-2005	5	\$38.31	0.00	65.00	\$39.42			0				
30-Sep-2005	6	\$39.68	0.00	65.00	\$39.74			0				
30-Sep-2005	7	\$46.54	0.00	65.00	\$40.24			0				
30-Sep-2005	8	\$219.90	4000.00	65.00	\$48.58		4,000	111,972		111,972		
30-Sep-2005	9	\$241.15	4000.00	65.00	\$87.02	4,000		111,972	111,972			
1-Oct-2005	10	\$258.19	4000.00	65.00	\$143.85	4,000		111,972	111,972			
1-Oct-2005	11	\$241.15	4000.00	65.00	\$91.01	4,000		111,972	111,972			
1-Oct-2005	12	\$241.15	4000.00	65.00	\$63.48		4,000	111,972		111,972		
1-Oct-2005	13	\$251.39	4000.00	65.00	\$57.06		4,000	111,972		111,972		
1-Oct-2005	14	\$241.15	4000.00	65.00	\$96.12	4,000		111,972	111,972			
1-Oct-2005	15	\$219.90	4000.00	65.00	\$111.04	4,000		111,972	111,972			
1-Oct-2005	16	\$200.00	4000.00	65.00	\$68.51	4,000		111,972	111,972			
1-Oct-2005	17	\$217.07	4000.00	65.00	\$54.13		4,000	111,972		111,972		
1-Oct-2005	18	\$239.60	4000.00	65.00	\$52.98		4,000	111,972		111,972		
1-Oct-2005	19	\$241.15	4000.00	65.00	\$77.03	4,000		111,972	111,972			
1-Oct-2005	20	\$240.18	4000.00	65.00	\$106.18	4,000		111,972	111,972			
1-Oct-2005	21	\$241.15	4000.00	65.00	\$40.06		4,000	111,972		111,972		
1-Oct-2005	22	\$100.00	4000.00	65.00	\$40.76		4,000	111,972		111,972		
1-Oct-2005	23	\$55.00	0.00	65.00	\$44.52			0				
1-Oct-2005	24	\$38.51	0.00	65.00	\$37.01			0				
Total for 1-Oct-2005								=	1,455,636	783,804	671,832	1,455,636

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:	<u>¢ per M3</u>	<u>Tier Charge</u>	
Tier 0 - no charge	32,248	0.0 \$	-
Tier 1	128,992	0.5 \$	645
Tier 2	510,592	0.6	Cash Out Customer over delivered! EGD reserves the right to cash out excess at 50% of the lowest daily index cost of gas!
	671,832	\$	645 = Daily Imbalance Charges on Oct. 1st + Cash Out
Cum Imbalance:	<u>¢ per M3</u>	<u>CI Charge</u>	
111,972	2.0 \$	2,239	= Cumulative Imbalance Charges on Sept. 30th
161,240	2.0 \$	3,225	= Cumulative Imbalance Charges on Oct. 1st
	\$	5,464	= Total Cumulative Imbalance Charges on Oct. 1st
Total Charge:	\$	6,109	= Total Imbalance Charges on Oct. 1st + Cash Out
Total Cash Out	<u>510,592</u>	m ³	EGD reserves the right to cash out excess at 50% of the lowest daily index cost of gas!

OFO Day:

Tier Imbalance:	<u>¢ per M3</u>	<u>Tier Charge</u>	
Tier 0 - no charge	32,248	0.0 \$	-
Tier 1	128,992	0.5	Cash Out Customer over delivered. EGD reserves the right to cash out excess at 50% of the lowest daily index cost of gas.
Tier 2	510,592	0.6	Cash Out Customer over delivered. EGD reserves the right to cash out excess at 50% of the lowest daily index cost of gas.
	671,832	\$	- = Daily Imbalance Charges on Oct. 1st OFO Day + Cash Out
Cum Imbalance:	<u>¢ per M3</u>	<u>CI Charge</u>	
32,248	2.0 \$	645	= Cumulative Imbalance Charges on Oct. 1st
111,972	2.0 \$	2,239	= Cumulative Imbalance Charges Carry Over from Sept. 30th
144,220 < 10% MCI	\$	2,884	= Total Cumulative Imbalance Charges on Oct. 1st OFO Day
			Note: Positive cumulative imbalance must not be greater than 10% MCI on summer OFO day.
Total Charge:	\$	2,884	= Total Imbalance Charges on Oct. 1st OFO Day + Cash Out
Total Cash Out	<u>639,584</u>	m ³	EGD reserves the right to cash out excess at 50% of the lowest daily index cost of gas.

Current Rate 125 (Normal Day = OFO Day):

Delivered Volume	m ³	1,455,636	
2% of Delivered Volume		29,113	to BGA. The customer's BGA needs to be equal to zero within five (5) days after the end of each month.
Total Imbalance		671,832	
Net Imbalance:		642,719	= Supply Underrun Gas.

EGD orders the customer to dispose of Supply Underrun Gas.
 If customer fails to dispose of Supply Underrun Gas, EGD would purchase Supply Underrun Gas at 50% of the lowest daily index cost of gas.