

STAR (STORAGE AND TRANSPORTATION ACCESS RULE)

HIGHLIGHTS OF STAKEHOLDER MEETINGS – APRIL 16-18, 2008

Options	Participants				
	Gas Utilities	Consumer Groups	Third Party Storage Providers	Marketers	Pipelines and Gas-fired generators
<i>Non-discriminatory Access to Transportation:</i>					
a. Open Season for Transportation Services	<ul style="list-style-type: none"> • Transportation capacity (Union rate M12 and C1) is offered through open seasons and negotiated arrangements; open season results are not posted on company's website • Not practical to hold open seasons for Union rate M16; decided on a case-by-case basis • Capacity for EGD rate 331 is offered on a case-by-case basis; will consider providing Index of Customers and methodology on capacity allocation 	<ul style="list-style-type: none"> • Generally agree with Board staff's minimum standards for open season 	<ul style="list-style-type: none"> • Not practical to hold open seasons for Union rate M16; should be decided on a first-come basis 	<ul style="list-style-type: none"> • Board rules need to be consistent with FERC and NEB-regulated pipelines; Board should not create regulatory advantage or disadvantage • Generally agree with Board staff's minimum standards for open season • Agree with open season for existing transportation capacity that is not currently under contract (e.g., similar to TCPL) 	<ul style="list-style-type: none"> • If pipelines do not use an open season, FERC requires that the procedure for handling requests for transportation service on a non-discriminatory basis be included in the tariff • Generally agree with Board staff's minimum standards for open season; similar to FERC and NEB-regulated pipelines; certain standards such as minimum notice could be agreed upon between transporter and stakeholders • Agree with existing transportation capacity open season; different rules for new vs. existing capacity (e.g., allocation methodology)

Please note that some of the comments are individual participant comments and may not necessarily reflect a consensus position of the entire stakeholder group.

STAR (STORAGE AND TRANSPORTATION ACCESS RULE)
HIGHLIGHTS OF STAKEHOLDER MEETINGS – APRIL 16-18, 2008

Options	Participants				
	Gas Utilities	Consumer Groups	Third Party Storage Providers	Marketers	Pipelines and Gas-fired generators
b. Storage Connection Agreement (SCA)	<ul style="list-style-type: none"> Equivalent to Union's M16 contract; prepared on a case-by-case basis; will consider whether contracts can be made public Standard M16 contract is posted on website 		<ul style="list-style-type: none"> Additional nomination windows and transportation capacity would be available under M16 contract so customers have access to third-party storage and balancing services 	<ul style="list-style-type: none"> No transportation access barriers to entry for independent storage providers 	<ul style="list-style-type: none"> SCA is negotiated with parties and then approved by FERC; in public domain
c. Standard Form of Contracts for Transportation Services	<ul style="list-style-type: none"> Standard M12 contract is posted on website Negotiated M12 contracts and standard C1 transportation contracts are not posted on website EGD's rate handbook is posted on website 	<ul style="list-style-type: none"> Contracts should be Board approved Negotiated agreements should be posted on company's website Service priority rules need to be included in standard contracts 		<ul style="list-style-type: none"> Include provision in contract re NAESB's nomination windows (e.g., no provision in C1 transportation contracts) Need standard terms and conditions for transportation services Service priority rules and nomination procedures need to be included in standard form of contract 	<ul style="list-style-type: none"> FERC and NEB-regulated pipelines have standard form of contracts and standard terms and conditions; negotiated agreements are posted on company's website; these rules allow consumers to ascertain the value of the service and should apply to Union and EGD

Please note that some of the comments are individual participant comments and may not necessarily reflect a consensus position of the entire stakeholder group.

STAR (STORAGE AND TRANSPORTATION ACCESS RULE)
HIGHLIGHTS OF STAKEHOLDER MEETINGS – APRIL 16-18, 2008

Options	Participants				
	Gas Utilities	Consumer Groups	Third Party Storage Providers	Marketers	Pipelines and Gas-fired generators
Consumer Protection	<ul style="list-style-type: none"> Competitive market; no role for Board Consumers have different avenues to address anti-competitive behaviour such as courts, Competition Bureau 	<ul style="list-style-type: none"> Need transparent TS market to protect in-franchise customers who purchase short-term storage services Board needs to set minimum standards for storage open seasons 	<ul style="list-style-type: none"> Competitive market establishes rules for storage open season Need flexibility for offering storage capacity into the marketplace (e.g., choose from a menu of options) Board could set “guiding principles” for storage open seasons 	<ul style="list-style-type: none"> Competitive market; no role for Board Storage contracts should also include service priority rules and nomination procedures 	<ul style="list-style-type: none"> FERC-regulated storage companies have standard form of contracts; negotiated agreements are posted; these rules allow consumers to ascertain the value of the service and should apply to Union and EGD Consumers should have a fair and open opportunity to contract for storage capacity
Reporting Requirements	<ul style="list-style-type: none"> Generally agree with FERC 284 reporting requirements Posted Index of Customers for M12 and MPSS services FERC 284 too burdensome for small storage operators; Board set minimum requirements Concerned with 	<ul style="list-style-type: none"> Generally agree with FERC 284 reporting requirements Union to report estimate of the amount of in-franchise storage (i.e., Union’s expected excess storage capacity out of the 100 PJ reserved for in-franchise use) that 	<ul style="list-style-type: none"> FERC 284 too burdensome for small storage operators (e.g., transactional reporting); Board sets a threshold based on size of storage provider No reporting of commercially sensitive material (e.g., price) 	<ul style="list-style-type: none"> Generally agree with FERC 284 reporting requirements; small storage providers allowed to request exemptions of certain reporting requirements if they can prove its too burdensome 	<ul style="list-style-type: none"> Generally agree with FERC 284 reporting requirements Reporting exemptions for smaller storage providers should be based on market value rather than “too burdensome”

Please note that some of the comments are individual participant comments and may not necessarily reflect a consensus position of the entire stakeholder group.

STAR (STORAGE AND TRANSPORTATION ACCESS RULE)
HIGHLIGHTS OF STAKEHOLDER MEETINGS – APRIL 16-18, 2008

	Participants				
<i>Options</i>	Gas Utilities	Consumer Groups	Third Party Storage Providers	Marketers	Pipelines and Gas-fired generators
Reporting Requirements (cont'd)	disclosure of confidential information under Freedom of Information Act and Protection of Privacy Act (FIPA)	is expected to be available over the next winter season before market participants are required to bid for unregulated storage services for the coming winter; assist market participants in storage purchasing strategies.			
Complaint Procedure	<ul style="list-style-type: none"> • Union has process in place; established through working group; complaints go through company's ADR process • No role for Board in competitive market; consumers have different avenues to address anti-competitive behaviour such as courts, Competition Bureau 	<ul style="list-style-type: none"> • Board should develop minimum standards 	<ul style="list-style-type: none"> • Agree to written company complaint process • What should be the role of the Board in the competitive storage market? 	<ul style="list-style-type: none"> • Complaints go through company's ADR process before coming to Board 	<ul style="list-style-type: none"> • Complaints go through company's ADR process before coming to Board

Please note that some of the comments are individual participant comments and may not necessarily reflect a consensus position of the entire stakeholder group.