Peter C.P. Thompson, Q.C.
T 613.787.3528
pthompson@blg.com

Borden Ladner Gervais LLP
World Exchange Plaza
100 Queen St, Suite 1300
Ottawa, ON, Canada K1P 1J9
T 613.237.5160
F 613.230.8842
blg.com

Borden Ladner Gervais

File No. 339583/000185

By electronic filing

January 16, 2015

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th floor
Toronto, ON M4P 1E4

Dear Ms. Walli,

RE: 2014 Natural Gas Market Review – Consultation and Stakeholder Conference
Board File No.: EB-2014-0289

We are enclosing the comments submitted on behalf of Canadian Manufacturers & Exporters ("CME").

Yours very truly,

Peter C.P. Thompson
PCT/kt
Encls.

c. Interested Parties EB-2014-0289
Paul Clipsham and Ian Shaw (CME)
Vince DeRose and Emma Blanchard (BLG)

OTT01: 6763056: v1

EB-2014-0289

IN THE MATTER OF the Ontario Energy Board Act 1998, S.O. 1998, c.15, (Schedule B) as amended;

AND IN THE MATTER OF a consultation to examine recent developments in the North American natural gas market to better understand any potential implications for Ontario's natural gas sector.

COMMENTS OF CANADIAN MANUFACTURERS & EXPORTERS ("CME")

January 16, 2015

Peter C.P. Thompson, QC
Vincent J. DeRose
Emma Blanchard
Borden Ladner Gervais LLP
Barristers & Solicitors
100 Queen Street
Suite 1300
Ottawa, ON K1P 1J9
Counsel for CME

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I. INTRODUCTION

1. The stated purpose of this 2014 Natural Gas Market Review ("**NGMR**") is to "... examine recent developments in the North American natural gas market to better understand any potential implications for Ontario's natural gas sector."[1]

2. Its objectives are to provide insights which will assist the Board to:

- Identify the potential need for modifications to the Board's regulatory framework/ policies; and
- Review utility applications that affect the rates and quality of service to customers.

3. In its September 19, 2014 letter to stakeholders, the Board stated that the following matters would be included within the ambit of the review:

- A review of Winter 2013/14 natural gas market conditions and prices in Ontario in order to explain what happened and why;
- An examination of the underlying drivers of the Quarterly Rate Adjustment Mechanism ("**QRAM**"), highlighting the cost and risk trade-offs of different gas supply planning parameters;
- The key factors affecting North American and Ontario natural gas markets, changes in these since the 2010 Review, and forecast natural gas demand, supply, and prices to 2020; and
- Any regulatory implications arising from the Review and any other key issues that should be considered by the Board.

4. Stakeholders were given the opportunity to advise the Board of any issues which they believed should be discussed at the conference. After receiving such advice from several stakeholders, Board Staff prepared an agenda which grouped the issues into the following five (5) main categories:

- Impact of market developments since the 2010 NGMR;
- Issues raised by winter 2013/14 natural gas market events;
- Concerns about the inter-relationships between electricity and gas markets;

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1 OEB letter to interested parties dated September 19, 2014.

- The evolution of gas markets over the foreseeable future; and
- How these changes might impact natural gas regulation in Ontario.

These categories of issues provided stakeholders with the framework for their preparation of materials to be presented at the conference.

5. Board staff engaged Navigant Consulting Limited ("**Navigant**") to provide two (2) reports for the purposes of informing the consultation on the following:

- Natural gas market conditions and prices over the winter 2013/14 period to explain what happened, why, and how the underlying drivers of QRAM were affected; and
- The key factors affecting North American and Ontario natural gas markets, changes in these since the 2010 Review, and forecast demand, supply, and prices to 2020.

The Navigant reports were posted on the Board's website on November 27, 2014. They were not available to other conference participants before the November 24, 2014 deadline for the filing by those stakeholders of any materials they wished to present at the conference scheduled for December 3 and 4, 2014.

6. CME joined with the Federation of Rental-housing Providers of Ontario ("**FRPO**") and the Ontario Greenhouse Vegetable Growers ("**OGVG**") to retain John Rosenkranz to prepare and present his assessment of the potential for Dawn Parkway Turn-back by US LDCs to contribute, in the near term, to material under-utilization of incremental capacity constructed in Ontario to transport shale gas from the Marcellus producing area in the US Appalachian Basin to the Ontario and Quebec markets.

7. The risk that utility construction of infrastructure could become unnecessary in the early years of its operation has always been a matter of concern to regulators. This concern is the underlying rationale for the "Term-up" provision recently approved by the National Energy Board (**"NEB"**) in TransCanada PipeLines Limited's (**"TCPL"**) RH-001-2014 Decision dated November 28, 2014. We submit that this potential for under-utilization concern is also the underlying rationale for the Board's recent decision approving the Enbridge Gas Distribution Inc. (**"EGD"**) GTA Project (EB-2012-0451). In that Decision,

the Board recognized that the distribution customers should not automatically bear the costs associated with incremental capacity added to serve transportation customers.[2]

8. We also suggest that the potential for under-utilization concern is the underlying rationale for the Federal Energy Regulatory Commission (**"FERC"**) policy that the pipeline owner is responsible for the costs of new capacity that is not fully utilized. The FERC expresses that policy as follows:

> *"The threshold requirement in establishing the public convenience and necessity for an existing pipeline proposing an expansion project is that the pipeline must be prepared to financially support the project without relying on subsidization from its existing customers."*[3]

9. Mr. Rosenkranz has filed evidence dated January 9, 2015, in the Union Gas Limited (**"Union"**) 2016 Dawn-Parkway Expansion proceeding (EB-2014-0261). This evidence elaborates on the risks of under-utilization of incremental transmission capacity associated with the emergence of the Marcellus producing area as a major supply centre to the US Northeast, the US South, the Gulf, the Mid-West, and to Eastern Canada. The evidence contains three (3) specific recommendations for mitigating the risks to utility customers of the construction by Union of incremental transmission capacity which could lead to a situation of near to medium term system under-utilization if no ratepayer protection mechanisms are imposed by the regulator.

10. In addition to the reports provided by Navigant and Mr. Rosenkranz, written and oral presentations to the conference were made by the following participants:

- Association of Power Producers of Ontario ("**APPrO**")
- EGD
- FRPO
- Independent Electricity System Operator ("**IESO**")
- Industrial Gas Users Association ("**IGUA**")
- The Ontario Energy Board ("**OEB**") Market Surveillance Panel ("**MSP**")
- Ontario Power Authority ("**OPA**")

[2] EB-2012-0451 Decision and Order, p. 51.
[3] FERC Statement of Policy on Certification of New Interstate Natural Gas Pipeline Facilities, 88 FERC 61,227 (1999).

- TCPL
- Union

The oral presentations concluded on December 4, 2014.

11. On December 23, 2014, Board staff circulated a Final Market Review Report from Navigant dated December 22, 2014 and a list of nine (9) questions for stakeholders to consider when preparing their written comments. These specific questions were not posed to members of the Navigant team, or to any other participants during the proceedings on December 3 and 4, 2014. Moreover, in the case of some of Board staff's proposed issues, there is little, if any, information in the conference materials which pertains to the subject matter of the questions posed. As a result, participants in the process are currently unaware of the positions or suggestions which either the Board staff's consultants or those making presentations on behalf of other stakeholders may have with respect to the matters raised in these questions.

12. In these circumstances, responses which stakeholders provide to the questions framed by Board staff can only be considered as high level preliminary suggestions. More definitive stakeholder responses can only be provided when all participants in the process have had an opportunity to consider the preliminary responses provided by Board staff's consultants and others involved in the process, and when any information, not presented at the conference but relevant to the issues raised by the questions, has been taken into account.

13. The comments and suggestions below are provided in this context. Mr. Rosenkranz has assisted us in developing some of the suggestions which we invite the Board to consider. We have also seen drafts of the comments to be provided on behalf of FRPO, OGVG, and the Association of Major Power Consumers in Ontario ("AMPCO").

14. In the sections of these submissions which follow, we use the heading "Natural Gas Market Developments" to cover comments we have with respect to issues grouped by the Board in the last three (3) bullet points described in paragraph 4 above. To cover comments we have with respect to matters falling within the ambit of the first two (2) bullet points in that paragraph, we use the topic heading "Winter 2013/14 Market Conditions".

II. NATURAL GAS MARKET DEVELOPMENTS

15. Some conclusions which we believe can reasonably be drawn from the information presented at the conference with respect to this topic include the following:

(a) Natural gas production in conventional supply areas such as Alberta is materially lower than in prior years. The decline in Western Canadian Sedimentary Basin ("**WCSB**") production is likely to continue in the future;

- Alberta gas is increasingly no longer competitive in Eastern domestic and export markets.[4] The Ontario market is now supplied from multiple sources;
- The Gas Supply Plans and the distribution services provided by Ontario LDCs have generally been based on natural gas produced from the WCSB and the use of market area storage to manage seasonal variations of consumption. This gas supply strategy maximized the utilization of expensive long haul transportation services and took advantage of distributors' underground storage resources at Dawn. However, with WCSB deliveries declining and new shale gas supplies from the Northeast US now entering the market through multiple paths, this gas supply strategy and the distributor services based on this strategy are becoming obsolete.
- There are reduced gas flows on the TCPL Mainline. There are flow reversals between Michigan and Dawn on the Great Lakes Gas Transmission System ("**GLGT**"). Less gas is flowing through Ontario to markets in the US Northeast and there is materially increased demand for short-haul transportation service from Dawn and Niagara to markets in Ontario and Quebec;
- Marcellus gas is already flowing to Niagara in material volumes. In 2012, Niagara shifted from an export to an import point and there has been almost complete turn-back of Dawn to Kirkwall transportation service from Union;

(b) While there is broad agreement that Marcellus and Utica shale gas will become a significantly greater source of natural gas for the Ontario market, there is considerable uncertainty pertaining to the manner in which this gas will reach the province. There are a number of competing pipeline projects designed to deliver Marcellus and Utica shale gas into Ontario by different routes. The following

4 Southern and Eastern Ontario, Quebec and the US Northeast.

points illustrate the lack of consensus among NGMR participants with respect to the manner in which Appalachian Basin gas is likely to be delivered to the province:

- ICF International, appearing at the conference on behalf of Union, shows a large increase in gas deliveries from Michigan and New York via Niagara, but expects that Iroquois will continue to be an export point, particularly during the winter season.[5] The key driver for the ICF forecast appears to be the assumption that a large amount of new pipeline capacity will be built from the Appalachian Basin through Michigan into Dawn;

- TCPL, on the other hand, expects that the Ontario market will have multiple supply sources, including the WCSB, Dawn, Niagara/Chippewa and Iroquois.[6] TCPL also points out that gas delivered at Iroquois would enter the province downstream of existing pipeline constraints reducing the need for additional gas transmission structure from Dawn to supply markets in Eastern Ontario and Quebec;

- Not surprisingly, these forecasts align closely with the corporate interests of the sponsors and their affiliates. Spectra Energy, Union's parent, is a partner in the proposed NEXUS Gas Transmission Project, which would construct a new pipeline from Northeast Ohio to Michigan and expand existing pipeline systems to increase deliverability into Dawn. TCPL is the largest owner of the Iroquois Gas Transportation System (**"IGTS"**) and has reasons to downplay the need for new pipeline capacity to replace the capacity that would be lost as a result of the Energy East Oil Pipeline Project.

- The consequences of the uncertainties pertaining to the manner in which Appalachian Basin gas is likely to be delivered to Ontario are compounded by uncertainties pertaining to the effect on the Ontario market of the recently NEB approved TCPL tariff and toll changes, the issues raised by TCPL's Energy East Project, and the magnitude of the construction projects being undertaken and proposed by EGD, Union and TCPL to reduce dependence

[5] ICF "Future Trends: Assessing Natural Gas Market Requirements through 2020", p. 29.
[6] TCPL presentation, p. 13 and Transcript, Vol. 2, p. 45.

on WCSB supplies and to gain access to shale gas production located close to the market.

(c) There was little, if any, discussion at the conference on the criteria which regulators should apply to determine, in the public interest, the most appropriate infrastructure configuration for bringing Appalachian Basin shale gas to the Ontario market. Similarly, there was little, if any, discussion about the ratepayer protection measures that should be imposed to reasonably insulate them from the risks associated with infrastructure under-utilization.

(d) Discussions at the conference focused on the supply side of the market. While it was acknowledged that natural gas power generation would likely be the primary driver for future increases in demand. Navigant and ICF present very different projections of Ontario gas demand.[7] ICF shows growth in residential, commercial and industrial consumption, but Navigant shows these markets to be essentially flat. On the other hand, Navigant shows a large increase in electric power demand in the early 2020s that appears to be inconsistent with the IESO's procurement strategy, which includes a mix of gas, conservation, renewables and imports from Quebec and Manitoba.[8] More importantly, the gas distributors themselves did not provide an explanation of the long-term gas demand forecasts that are supporting their current gas supply and facilities expansion plans, and how these forecasts compare to the projections presented by the consultants.

(e) Also lacking was any detailed analysis of the extent to which Demand Side Management (**"DSM"**) programs or pricing incentives can reduce peak consumption so as to reduce the need for additional facilities expansion.

III. WINTER 2013/14 MARKET CONDITIONS

16. Conclusions which we believe can reasonably be drawn from the information presented to the conference on this topic include the following:

[7] Compare Figure 33 in the Navigant final report and the graph on p. 23 of the ICF presentation.
[8] Transcript, Vol. 2, pp. 93-94.

(a) Extreme weather conditions, in combination with a number of other circumstances, caused natural gas spot prices in Ontario and elsewhere to elevate significantly during the winter months of 2013 and 2014;

(b) Under the auspices of their gas supply plan protocols, the reaction of Ontario gas distributors to these stressful events varied. Union procured the incremental gas it needed to cover the colder than normal weather impact on its system gas customers in the "month ahead" market. On the other hand, EGD bought its incremental requirements in the spot market. As a consequence, the unit costs of incremental supply which EGD incurred materially exceeded the unit costs Union incurred for its incremental supplies;

(c) At the time of presenting its gas supply plans to the Board for approval, neither Union nor EGD indicated how their respective plans would likely operate in abnormally stressful situations like the unusually and extremely severe and continuing cold snap which was experienced last winter;

(d) Direct purchasers were significantly burdened with the increased costs of the incremental supplies they needed to acquire to comply with their obligations. Those who did not comply with their obligations were subject to severe penalties, which, in the case of Union, cumulatively exceeded the actual gas costs Union incurred to cover the defaults by more than $5 M. None of the $5 M surplus was credited to direct purchasers;

(e) Contributing to the extremely high costs for incremental supplies incurred by some direct purchasers were TCPL tolls for discretionary IT services between Empress and Dawn priced at floor prices in amounts ranging between 175%-1,600% of Firm tolls as shown in the TCPL IT Bid Floors and Fuel information for February 2014 attached as Schedule 1. The same information for January 2014, also attached as part of Schedule 1, shows that TCPL set the floor prices for IT services between Empress and Dawn between 195% and 2,729% of the Firm tolls on all days except January 26 and 28 when the floors were set at the Firm toll rate;

(f) The Navigant November 25, 2014 Report indicates that TCPL set its floor prices for interruptible transportation ("IT") between Empress and Dawn for all but five

(5) days in February 2014 at values higher than the trading value of the commodity at Dawn during that period. This Report, at page 21, states:

> *"As shown in FIGURE 24, with respect to February, the landed price of Empress gas at Dawn, based on the new higher IT tolls with a bid floor that averaged C$11.97/GJ, was at or above the actual Dawn prices on all but five days in the month. [...] The higher IT tolls meant that spot Empress gas was uneconomic in the Dawn market [...]."*

(g) TCPL's conduct in setting its IT floor prices at levels higher than the trading value of the commodity at Dawn effectively constitutes a refusal by a utility to provide a utility service when capacity to provide the service is available. The setting of floor prices at such levels cannot reasonably be construed as a *bona fide* offer to provide interruptible transport. Rather, the conduct evidences a withholding of an available utility service. Such behaviour does not constitute a reasonable exercise of discretionary pricing related to utility services. The exercise by TCPL of its unlimited pricing discretion for non-firm services has caused harm to the Ontario market. Such conduct should not be tolerated by Ontario authorities; and

(h) The stressful 2013/2014 winter conditions which significantly elevated gas prices had a similar effect on Ontario electricity prices.

IV. RESPONSES TO BOARD STAFF QUESTIONS

17. This section contains suggestions which we believe warrant further consideration in a proceeding where the views of all stakeholders pertaining to matters raised in the questions posed by Board staff can be fully and fairly considered. These suggestions are informed, in part, by the conclusions which we have outlined in the preceding sections of these comments.

1. How can the Board's assessment of distributor natural gas supply plans be enhanced to ensure a better understanding of the various elements of the plan, the potential risks associated with those elements, and the applicant's proposals for methods of managing those risks?

18. Suggestions which we invite the Board to consider include the following:

(a) The Board should consider implementing a more structured integrated resource planning review of distributor gas supply strategies. There is currently no single forum to facilitate a comprehensive examination of distributors' gas supply strategies. Recent practice has been the piece-meal disclosure of individual contract decisions and facilities construction proposals in rate cases, deferral account cases and leave-to-construct proceedings. As the Board has acknowledged, further examination of integrated resource planning for gas utilities is warranted;[9]

(b) Distributors should provide forecasts of sales and send-out that match the 15 or 20 year terms of new gas transportation contracts to show how these contracts will be utilized over the life of the commitment. Forecasts should include peak day requirements, winter season requirements, and annual requirements;[10]

(c) Distributors should be required to show how their gas supply plans and any alternatives that were considered, but rejected, perform over a range of gas demand and price scenarios. In particular, utilities should be directed to describe how their gas supply plans are likely to operate under abnormal "stress testing" conditions such as severely colder than normal, or severely warmer than normal weather.

(d) The proposals made on behalf of FRPO and OGVG for LDCs gas supply plans to be broadened to include storage targets, sensitivity analysis, and potential contingency plans are sensible and worthy of implementation.

(e) The impact on the price of gas supplies to the Ontario market of TCPL's unlimited pricing discretion for non-firm services should be fully investigated. Ontario authorities should react strongly against the unreasonable exercise by TCPL of this pricing discretion in a manner which harms the Ontario market.

2. How can the Board better ensure that it's assessment of natural gas applications is informed by up to date information on relevant developments in the broader North American natural gas sector?

19. The suggestions which we believe warrant further consideration include the following:

(a) The circulation to stakeholders of an annual NGMR report prepared by independent consultants retained by the Board. The final report provided by

9 EB-2012-0451 et al. Decision, p. 46 ("In light of the evidence presented, the Board concludes that further examination of integrated resource planning for gas utilities is warranted.")

10 It would appear that not all Ontario distributors prepare a long-term gas requirements forecast. In the Brantford-Kirkwall/Parkway D case, Board staff asked for Union's forecasted system demands over the next 10 years. Union responded that it "does not have a 10 year forecast". (EB-2013-0074, Ex.1.A1.UGL.Staff.9).

Navigant in this proceeding is an example of the type of report which could be circulated annually;

(b) Expert opinions from utility applicants and from non-applicant sources could then be prepared having regard to the information presented by the Board's independent consultant. Under the auspices of this type of a process, the Board should be able to quickly identity the extent to which there are any material disagreements amongst stakeholders with respect to the current status of the market.

3. What is the appropriate role of the Board in relation to the efficient operation of the natural gas market in the public interest, for example, regarding the sufficiency of Ontario access to northeastern U.S. gas supplies?

20. The suggestions we invite the Board to consider include the following:

(a) The Board should be pro-active in prompting distributors to keep up with changes in the market. In taking such pro-active measures, the Board must take care to refrain from tainting its adjudicative responsibilities. The Natural Gas Electricity Interface Review ("**NGEIR**") provides a good example of the Board's pro-active use of its regulatory powers to prompt proceedings leading to the more efficient operation of the natural gas market in the public interest;

(b) Examples of provocative action which the Board might take to prompt the development of gas distributor services compatible with the decline in WCSB deliveries and the increase in new shale gas supplies from the Northeast US entering the market through multiple paths include the following:

(i) The Board could direct the utilities to consider whether requiring direct purchasers to deliver a set quantity of gas each and every day (the Obligated DCQ) continues to make sense; and

(ii) Similarly, the Board might direct the utilities to introduce services which provide direct purchasers with options to deliver gas to receipt points other than Parkway or Dawn, such as Niagara, for example. Direct purchase customers should have access to the same receipt points that the distributors use to receive system sales supplies.

(c) In approving the construction of incremental facilities to accommodate the delivery to Ontario of natural gas from new sources of supply, the Board should take care to ensure that:

(i) the need for the incremental facilities has been fully supported by long-term demand forecasts;

(ii) there has been an adequate presentation of the manner in which the applied for facilities and alternatives that were considered but rejected, will perform over a range of demand scenarios; and

(iii) ratepayers are appropriately insulated from the costs consequences of any material system under-utilization that subsequently occurs.

4. In what ways, if any, do the Board's public interest mandate and/or views in relation to the overarching outcome(s) for Ontario's natural gas market require clarification?

21. We are currently unaware of any aspect of the Board's legislative public interest mandate which requires clarification.

22. We need to be reminded of the Board's current views in relation to the over-arching outcome(s) for Ontario's natural gas market before we can consider whether those views require clarification in any way.

5. What are the merits and disadvantages of replacing the Empress (AECO – C) price with the Dawn Hub price as the reference price for the commodity used for regulatory purposes?

23. Little, if any, information about this issue was presented to the conference. Intuitively, the proposal seems to make sense. The comments made on behalf of FRPO and OGVG present a persuasive case for changing the reference location to Dawn. That said, we believe that the pros and cons of the proposal must be presented and analyzed in the course of a public hearing, before any decision can be made to implement it.

6. Are there mechanisms for enhanced inter-regulatory agency communication and agenda coordination that would facilitate the consideration of the potential broader impacts of specific regulatory applications?

24. Apart from the annual CAMPUT conference, we are unaware of the extent to which there are currently any formal or informal inter-agency communications between energy

regulators in Canada and the US. Enhancing inter-regulatory agency communication and agenda coordination to facilitate a consideration of the broader impacts of specific regulatory applications is obviously desirable. We believe that the regulatory agencies should take the lead in suggesting mechanisms for achieving such an outcome.

7. Regarding regulatory aspects of the natural gas and electricity markets interface, what process should the Board use to

- ***keep abreast of developments affecting both markets (e.g. role and regulation of natural gas storage); and***
- ***facilitate better cross-sector communication and coordination (e.g. the impact of GDAR on potential information sharing between electricity and natural gas stakeholders)?***

25. The Board may wish to consider commissioning an annual report from an independent expert, similar to the Navigant report filed in this case, but with the scope of that report confined to a review of the current state of the interface between the gas and electricity markets. Other interested parties should then be allowed to respond to the analysis provided by the Board's consultant before the Board draws any conclusions with respect to the matter.

26. We support the recommendations of the IESO for facilitating better cross-sector communication and coordination between natural gas and electricity market participants.

8. In what ways should access to information on Ontario primary and secondary natural gas markets be made more transparent for buyers and sellers?

27. We support AMPCO's comments pertaining to specific measures which the Board should consider implementing to provide greater transparency in the gas market. In addition to those measures, we urge the Board to consider a review of its Storage Transportation Access Rule ("**STAR**") reporting requirements. For transportation services, these reporting requirements should be as rigorous as the reporting that TCPL provides to the NEB and the market. For both transportation and storage services, the utilities should be required to make full and complete disclosure of all facts material to the efficient operation of the primary and secondary markets.

9. What, if any, are the merits of a stakeholder discussion on how to facilitate broad energy sector optimization (e.g. storage; multi-source district heating/cooling; combined heat and power; CDM/DSM) and if so, in what context should such a discussion take place?

28. The facilitation of broad energy sector optimization is a desirable outcome. We invite the Board to consider convening a discussion of the topic in a conference or forum setting, similar to this NGMR process, where funding will be available to participants determined by the Board to be eligible for such relief.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 16th day of January, 2015.

Peter C.P. Thompson, QC
Vincent J. DeRose
Emma Blanchard
Counsel for CME

OTT01: 6757848: v1

TransCanada Pipelines Limited
IT Bid Floors and Fuel

From / To Gas Day: 2014-Feb-01 / 2014-Feb-28
Receipt Location: Empress
Delivery Location: Union SWDA

Service Type	Receipt Location	Delivery Location	Cycle	Begin Date	End Date	Load Factor (%)	Bid Floor ($/GJ)	Fuel Ratio (pressure)
FH	Empress	Union SWDA	Timely	2014-Feb-01 09:00	2014-Feb-04 09:00	200	2.8400	6.13
			Timely	2014-Feb-04 09:00	2014-Feb-06 09:00	175	2.4850	6.13
			Timely	2014-Feb-06 09:00	2014-Feb-07 09:00	1,495	21.2290	6.13
			Timely	2014-Feb-07 09:00	2014-Feb-08 09:00	200	2.8400	6.13
			Timely	2014-Feb-08 09:00	2014-Feb-11 09:00	275	3.9050	6.13
			Timely	2014-Feb-11 09:00	2014-Feb-13 09:00	855	12.1410	6.13
			Timely	2014-Feb-13 09:00	2014-Feb-19 09:00	995	14.1290	6.13
			Timely	2014-Feb-19 09:00	2014-Feb-20 09:00	650	9.2300	6.13
			Timely	2014-Feb-20 09:00	2014-Feb-21 09:00	715	10.1530	6.13
			Timely	2014-Feb-21 09:00	2014-Feb-22 09:00	665	9.4430	6.13
			Timely	2014-Feb-22 09:00	2014-Feb-26 09:00	1,600	22.7200	6.13
			Timely	2014-Feb-26 09:00	2014-Feb-27 09:00	1,175	16.6850	6.13
			Timely	2014-Feb-27 09:00	2014-Feb-28 09:00	1,435	20.3770	6.13
			Timely	2014-Feb-28 09:00	2014-Mar-01 09:00	1,405	19.9510	6.13

TransCanada Pipelines Limited
IT Bid Floors and Fuel

From / To Gas Day: 2014-Jan-01 / 2014-Jan-31
Receipt Location: Empress
Delivery Location: Union SWDA

Service Type	Receipt Location	Delivery Location	Cycle	Begin Date	End Date	Load Factor (%)	Bid Floor ($/GJ)	Fuel Ratio (pressure)
FH	Empress	Union SWDA	Timely	2014-Jan-01 09:00	2014-Jan-03 09:00	329	4.6718	5.18
			Timely	2014-Jan-03 09:00	2014-Jan-07 09:00	888	12.6096	5.18
			Timely	2014-Jan-07 09:00	2014-Jan-11 09:00	1,234	17.5228	5.18
			Timely	2014-Jan-11 09:00	2014-Jan-14 09:00	195	2.7690	5.18
			Timely	2014-Jan-14 09:00	2014-Jan-15 09:00	245	3.4790	5.18
			Timely	2014-Jan-15 09:00	2014-Jan-17 09:00	311	4.4162	5.18
			Timely	2014-Jan-17 09:00	2014-Jan-18 09:00	750	10.6500	5.18
			Timely	2014-Jan-18 09:00	2014-Jan-21 09:00	1,495	21.2290	5.18
			Intraday1	2014-Jan-20 17:00	2014-Jan-21 09:00	2,250	31.9500	5.18
			Timely	2014-Jan-21 09:00	2014-Jan-22 09:00	1,495	21.2290	5.18
			Evening	2014-Jan-21 09:00	2014-Jan-22 09:00	2,250	31.9500	5.18
			Timely	2014-Jan-22 09:00	2014-Jan-23 09:00	2,245	31.8790	5.18
			Timely	2014-Jan-23 09:00	2014-Jan-24 09:00	2,729	38.7518	5.18
			Timely	2014-Jan-24 09:00	2014-Jan-25 09:00	195	2.7690	5.18
			Timely	2014-Jan-25 09:00	2014-Jan-26 09:00	350	4.9700	5.18
			Intraday2	2014-Jan-25 21:00	2014-Jan-26 09:00	100	1.4200	5.18
			Timely	2014-Jan-26 09:00	2014-Jan-27 09:00	350	4.9700	5.18
			Evening	2014-Jan-26 09:00	2014-Jan-28 09:00	100	1.4200	5.18
			Timely	2014-Jan-28 09:00	2014-Jan-29 09:00	1,500	21.3000	5.18
			Timely	2014-Jan-29 09:00	2014-Jan-30 09:00	300	4.2600	5.18
			Timely	2014-Jan-30 09:00	2014-Jan-31 09:00	311	4.4162	5.18
			Timely	2014-Jan-31 09:00	2014-Feb-01 09:00	233	3.3086	5.18

Generated: 2015-Jan-16 11:38:06