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<u>Information Request TOW-2-001</u>

Request:

Please describe in detail whether, prior to the issuance of the decision in D.P.U. 15-37, the Company planned to issue an RFP that would have sought services to identify alternatives to the Access Northeast project.

Response:

Prior to issuance of the decision in D.P.U. 15-37 the Company had not decided whether it would issue an RFP.

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<u>Information Request TOW-2-002</u>

Request:

If the Company did have plans prior to the issuance of the decision in D.P.U. 15-37 to issue such an RFP, please provide any and all documents evidencing such plans, including, but not limited to, any drafts of the RFP or portions thereof.

Response:

Please see response to Information Request TOW-2-001.

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Information Request TOW-2-003

Request:

Please refer to Figure 1 in Exhibit NG-TJB/JEA-1, p. 36, which lists the existing and proposed directly connected electricity generating plants by aggregation area. Please refer also to the Federal Energy Regulatory Commission Pre-Filing Application for Access Northeast that was filed on 11/3/2015 in Docket PF16-01.

Available at http://www.accessnortheastenergy.com/content/documents/ane/FERC/20151103-509431004016.pdf. As part of the Access Northeast project, Algonquin proposes to construct 26.8 miles of 16-inch diameter pipeline lateral (the "West Boylston Lateral"), 21.7 miles of 30-inch diameter pipeline loop along the existing Q-1 System, and 4.2 miles of 30-inch diameter pipeline loop (the "1-8 System Loop").

- (a) Which of the listed plants would be receiving gas through the proposed West Boylston lateral?
- (b) Which of the listed plants would be receiving gas through the proposed Q-1 System loop and the 1-8 System Loop?

Response:

- (a) It is our understanding that none of the listed plants will be served through the West Boylston lateral.
- (b) It is our understanding that the following plants would be receiving gas through the proposed Q-1 System loop and the 1-8 System loop: Fore River, Salem Power in MA and then via M&N Newington Power, NH, PSNH Newington, NH, Maine Natural Gas-Westbrook Energy Center, ME, Bangor Gas-Bucksport, ME, Casco Bay Power, ME.

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<u>Information Request TOW-2-004</u>

Request:

Please refer to Exhibit NG-TGB/JEA-1, page 30, footnote 8. Please explain how the Algonquin Rate Schedule ERS service will be used to deliver gas to generating facilities on M&NP.

Response:

Algonquin will have capacity entitlements on M&NP that will be made available to ERS customers enabling deliveries directly to generating facilities on M&NP.

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Information Request TOW-2-005

Request:

Please refer to Exhibit NG-TGB/JEA-1, page 24, lines 3-6. Please explain the difference between the "hourly no-notice service" and the "fast start service."

Response:

The "hourly no-notice service" is the component of the ERS rate schedule that provides the reservation of primary firm capacity throughout the gas day so that customers have the ability to nominate from their primary receipt points to primary delivery points any hour of the gas day and receive the highest priority of service.

The "fast start service" also referred to as Quick Start is the component of the ERS rate schedule that provides customers with the ability to immediately begin taking gas deliveries for up to two hours without a commensurate supply nomination.

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<u>Information Request TOW-2-006</u>

Request:

Please refer to Exhibit NG-TGB/JEA-1, page 24, lines 3-6. In which phase of the ANE project would the "no-notice" and "fast start" services become available?

Response:

The "no-notice" and 'fast start" (also referred to as "quick start") services become available in Phase 4.

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Information Request TOW-2-007

Request:

Does Algonquin currently offer a "no-notice" transportation service? If so, how does the pipeline provide this service without having deliverability from a large, local LNG storage facility?

Response:

Yes, Algonquin's no-notice services are currently provided under Rate Schedules AFT-E and AFT-ES. Algonquin is able to provide these no-notice services by requiring all AFT-E and AFT-ES customers to also have contracted for no-notice service with operator(s) of upstream facilities directly connected to AGT. All AFT-E or AFT-ES customers currently have upstream no-notice service contracts with Texas Eastern. Texas Eastern's no-notice services are supported by Texas Eastern's storage facilities. Please see response to TOW 2-005 for clarification between no-notice service and Quick Start.

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Information Request TOW-2-008

Request:

Is the Company aware of any pipelines in the U.S. or Canada that currently offer transportation services with enhanced hourly deliveries and short-notice or no-notice scheduling that use linepack instead of LNG storage? If so, please provide examples.

Response:

No.

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Information Request TOW-2-009

Request:

Please refer to Exhibit NG-TGB/JEA-1, p. 47, lines 1-11. Please describe the circumstances under which gas-fired generators in some locations in New England would be subject to higher gas costs than generators in other locations. Would the risk of this occurring be lessened if the physical capacity to move gas between the Algonquin and Tennessee pipeline systems at points such as Mendon, MA were expanded?

Response:

Typically, costs are highest in locations where demand for gas is high and there is insufficient pipeline capacity available to serve such demand. The Company does not believe that the risk of this occurring would be significantly lessened if the physical capacity to move gas between Algonquin and Tennessee at the various interconnections was increased. That is because the ability to flow between pipes is not typically constrained. Rather, the available capacity upstream of those interconnections is ordinarily the constraint.

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Information Request TOW-2-010

Request:

Please provide a detailed description of the sources of funds to pay for the study provided as Attachment ALGONQUIN-KK-4, including the amounts provided by each separate source.

Response:

This Information Requests refers to an Attachment that was not filed by National Grid. National Grid does not have the requested information.

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<u>Information Request TOW-2-011</u>

Request:

Please provide a detailed description of the purposes for which the study provided as Attachment ALGONQUIN-KK-4 was commissioned.

Response:

This Information Requests refers to an Attachment that was not filed by National Grid. National Grid does not have the requested information.

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<u>Information Request TOW-2-012</u>

Request:

Please provide a detailed description of the specific methodology used to estimate the Access Northeast project's environmental benefits as set forth in Attachment ALGONQUIN-KK-4.

Response:

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<u>Information Request TOW-2-013</u>

Request:

Please provide a detailed description of any and all assumptions (specifically including, but not limited to, assumptions regarding coal and oil displacement opportunities) used to estimate the Access Northeast project's environmental benefits as set forth in Attachment ALGONQUIN-KK-4.

Response:

This Information Request refers to an Attachment that was not filed by National Grid. National Grid does not have the requested information.

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Information Request TOW-2-014

Request:

Please provide, in machine-readable, spreadsheet form, any and all data used to support the estimate of the Access Northeast project's environmental benefits set forth in Attachment ALGONQUIN-KK-4.

Response:

This Information Request refers to an Attachment that was not filed by National Grid. National Grid does not have the requested information.