

**CENTRA GAS MANITOBA INC.
2013/14 GENERAL RATE APPLICATION**

VOLUME II

**GAS SUPPLY, TRANSPORTATION & STORAGE PORTFOLIO
AND RELATED COSTS**

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**GAS SUPPLY, TRSNPORTATION & STORAGE PORTFOLIO
AND RELATED COSTS**

1 **10.0 Overview of Tab 10**

2 Centra's mandate is to acquire, manage and distribute supplies of natural gas to meet
3 the Manitoba market requirement in a safe, cost-effective, reliable and environmentally
4 appropriate manner. The cost of gas is the most significant cost that Centra incurs and
5 is regulated, with the exception of Fixed Rate Primary Gas Service ("FRPGS"), on a
6 pass-through basis. Gas costs are passed on to customers in their rates without any
7 mark-up or profit to Centra. To ensure that only the cost of gas, no more and no less, is
8 passed on to customers, Centra maintains a number of Purchased Gas Variance
9 Accounts ("PGVA"), which record the differences between the cost of gas embedded in
10 sales rates and the actual cost of gas incurred. These differences are periodically either
11 refunded to or collected from customers by way of rate riders that either decrease
12 (refund) or add to (collect) the base sales rates and form part of the billed rates that are
13 charged to customers.

14

15 In this Application, Centra is requesting approval of the actual gas costs incurred in the
16 2010/11 Gas Year (from November 1, 2010 to October 31, 2011) of \$251.3 million and
17 the actual gas costs incurred in the 2011/12 Gas Year (from November 1, 2011 to
18 October 31, 2012) of \$160.1 million, as shown on Schedules 10.4.0 and 10.8.0,
19 respectively. Centra is also requesting approval of the forecast gas cost for the current

1 2012/13 Gas Year (from November 1, 2012 to October 31, 2013) of approximately
2 \$204.2 million.

3

4 In 2012, Centra received approval in Order 112/12 for the fixed costs arising from new
5 natural gas storage and related inter-state pipeline transportation arrangements with
6 ANR Pipeline Company ("ANR") and the Great Lakes Gas Transmission Limited
7 Partnership ("GLGT"), to become effective on April 1, 2013. Consequently, this Tab
8 discusses the operation of two Gas Supply, Transportation & Storage portfolios; the
9 current portfolio which expires March 31, 2013, and the new portfolio which commences
10 April 1, 2013, and reflects the costs associated with those arrangements.

11

12 This Tab provides a description of:

- 13 1. Centra's Gas Supply, Transportation & Storage portfolio of assets and the
14 operation of the existing and new portfolios;
- 15 2. The changes Centra has made to the existing Gas Supply, Transportation &
16 Storage portfolio since the 2011/12 Cost of Gas ("COG") Application;
- 17 3. The actual gas costs incurred and the gas cost deferral balances for the two Gas
18 Years from November 1, 2010 to October 31, 2012 that Centra seeks approval of
19 as part of this Application, and;
- 20 4. The forecast of gas costs for the 2012/13 Gas Year that Centra seeks approval
21 of as part of this Application.

22

23

24

1 **10.1 Centra's Gas Supply, Transportation & Storage Portfolio**

2 Centra's Gas Supply, Transportation & Storage Portfolio ("Gas Portfolio") that is used to
3 serve natural gas customers in Manitoba consists of natural gas supplies and the
4 associated transportation and storage arrangements. The total realized cost of Centra's
5 current Gas Portfolio was \$251.3 million in 2010/11, as shown below and as found in
6 more detail in Schedule 10.4.0:

7

Supply Costs	\$177.3 million
Fixed Transportation & Storage Costs	\$48.3 million
TCPL \$31.6 million	
U.S. assets \$16.7 million	
Variable Transportation & Storage Costs	\$11.7 million
Other Costs/(Revenues)	\$14.0 million
TOTAL	\$251.3 million

8

9 A detailed breakdown of these costs is provided in Section 10.4, which describes
10 2010/11 Gas Year costs and PGVA balances.

11

12 The total realized cost of Centra's current Gas Portfolio in 2011/12 was \$160.1 million as
13 shown below and found in more detail in Schedule 10.8.0:

Supply Costs	\$107.1 million
Fixed Transportation & Storage Costs	\$44.8 million
TCPL \$27.8 million	
U.S. assets \$17.0 million	
Variable Transportation & Storage Costs	\$14.1 million
Other Costs/(Revenues)	(\$6.0 million)
TOTAL	\$160.1 million

14

1 A detailed breakdown of these costs is provided in Section 10.8 which describes
2 2011/12 Gas Year costs and PGVA balances.

3

4 **Gas Supplies**

5 The two components of gas supplies in Centra's Gas Portfolio are Primary Gas and
6 Supplemental Gas.

7

8 **Primary Gas**

9 Primary Gas is natural gas received from Western Canadian sources, whether supplied
10 by Centra, by marketers through Western Transportation Service ("WTS"), or by
11 contractual arrangements referred to as Primary Gas Delivered Service. The costs
12 captured in the Primary Gas PGVA are outlined in Section 10.4.1 and Section 10.8.1.

13

14 ***Primary Gas – Centra Supply***

15 Centra purchases the majority of its Primary Gas at the Alberta border ("Empress")
16 under a two-year gas supply contract with ConocoPhillips Canada Marketing and
17 Trading ULC ("ConocoPhillips") for the period from November 1, 2012 to October 31,
18 2014. Prior to November 1, 2012, Centra purchased the majority of its Primary Gas
19 under a three-year supply contract with ConocoPhillips. Under both contracts, the two
20 components of Primary Gas supply are Baseload service (100% take or pay) and Swing
21 service. The monthly levels for these services are set thirty-two days prior to the
22 beginning of each month. The sum total of these services was 86,745 GJ/day as of
23 November 1, 2011 and 89,142 GJ/day as of November 1, 2012.

24

1 Natural gas purchased as Baseload service is priced relative to an AECO monthly index
2 as published in the Canadian Gas Price Reporter (“CGPR”), plus an AECO to Empress
3 transportation component. Natural gas purchased as Swing service is priced relative to
4 an AECO daily index as published in the CGPR, plus an AECO to Empress
5 transportation component. The Swing service provides for the purchase of natural gas
6 on a day-ahead basis with the option to revise the quantity requested on an intra-day
7 basis, subject to pipeline nomination deadlines. This allows Centra to react to changes in
8 the market requirement, primarily due to differences between actual and forecast
9 weather conditions. Swing service volumes represent gas supplies that are incremental
10 to Baseload purchases, gas supplies provided by marketers through WTS, and Primary
11 Gas Delivered Service.

12

13 ***Primary Gas – Marketer Supply (WTS)***

14 Manitoba natural gas customers may elect to purchase their Primary Gas directly from a
15 marketer, independent of Centra. The service provided by Centra to facilitate the
16 transportation of these gas supplies is known as Western Transportation Service
17 (“WTS”). The customer arranges, through a marketer, a source of natural gas in
18 Western Canada, which Centra receives at Empress. Centra is responsible for
19 transporting, storing and distributing the Primary Gas acquired by the marketer on behalf
20 of the customer. The price of that Primary Gas is negotiated between the marketer and
21 the customer and is not subject to review or approval by The Public Utilities Board
22 (“PUB”). Centra provides an Agency, Billing and Collection (“ABC”) Service to bill the
23 Primary Gas costs on behalf of a marketer to its customers.

24

1 The following table provides the number of WTS customers and Maximum Daily
2 Quantity (“MDQ”) of Primary Gas for WTS supply as of November 1, 2012, November 1,
3 2011 and November 1, 2010.

4

	Number of Customers	Maximum Daily Quantity (GJ/day)
November 1, 2012	17,900	20,058
November 1, 2011	19,600	24,455
November 1, 2010	29,300	27,618

5

6 ***Primary Gas – Primary Gas Delivered Service***

7 In addition to purchases under Centra’s Primary Gas supply contract and gas supplied
8 by marketers as part of the WTS, Centra also executes contractual arrangements for
9 Primary Gas Delivered Service whereby a counterparty delivers gas directly to the
10 Manitoba market. Primary Gas Delivered Service is used in lieu of TCPL transportation
11 from Empress and purchases under Centra’s Primary Gas supply contract.

12

13 In the 2011/12 COG Application, Centra referred to its Primary Gas Delivered Service
14 arrangements as “Delivered Service” only. The “Primary Gas Delivered Service” naming
15 convention was implemented to distinguish between delivered services intended to
16 replace Primary Gas from Western Canada and Supplemental Gas Delivered Service.

17

18 **Supplemental Gas**

19 Supplemental Gas is natural gas sourced on a daily, monthly or seasonal basis to serve
20 the Manitoba market’s peak day and seasonal requirements, and includes U.S. supplies,

1 and Supplemental Gas Delivered Service (Supplemental Gas Peaking Delivered Service
2 and Alternate Supply Service for Interruptible customers).

3

4 ***Supplemental Gas – U.S. Supplies***

5 In Centra's current Gas Portfolio, which expires on March 31, 2013, Oklahoma supply
6 can be delivered via ANR's southwest system to the load in winter and to storage in
7 summer. Louisiana supply can be delivered through ANR's southeast system during the
8 summer months for storage refill purposes. Centra may also purchase supplies in the
9 Michigan market and transport the gas to the Manitoba market using winter GLGT
10 capacity from Farwell or Deward to Emerson.

11

12 With the new Gas Portfolio, Chicago supply can be delivered on ANR to storage in both
13 summer and winter. Centra may purchase Michigan supply and transport the gas to the
14 Manitoba market using winter GLGT capacity from Farwell or Deward to Emerson;
15 and/or may purchase Michigan supply at ANR storage injection point for transfer into
16 storage. Emerson supply may also be purchased and transported on TCPL capacity
17 from Emerson to the Manitoba Delivery Area ("MDA") or used to maintain storage
18 injections.

19

20 ***Supplemental Gas – Peaking Delivered Services***

21 Peaking Delivered Services, in which supply is delivered directly to Manitoba by a
22 counterparty for a specified term dependent upon forecasted and actual loads, are
23 another source of Supplemental Gas.

24

1 ***Supplemental Gas – Alternate Supply Service***

2 Curtailment and/or the provision of Alternate Supply Service to Interruptible customers
3 may be required to conserve storage inventories or whenever demand may exceed
4 Centra’s deliverability. If supply is available for purchase and transport in the market,
5 Interruptible customers are offered Alternate Supply Service at rates that reflect the cost
6 of obtaining this service. Alternate Supply Service is also a form of Supplemental Gas
7 Delivered Service. It is priced separately for Interruptible customers. Prices and
8 quantities are arranged in a very short time horizon, and rarely more than a day in
9 advance.

10

11 **Gas Supplies Required for Centra’s Design Firm Peak Day**

12 Centra’s design firm peak day (the forecast volume of natural gas required to serve all
13 Firm Sales customers, including WTS customers, on the coldest winter day experienced)
14 for the 2011/12 Gas Year was 470,100 GJ/day. For the 2012/13 Gas Year, the design
15 firm peak day is forecast to be approximately 466,400 GJ/day. The following table
16 depicts the sources of supply required to meet the Manitoba market’s design firm peak
17 day requirement for the 2011/12 and 2012/13 Gas Years. Appendices 10.1 and 10.2 of
18 Tab 10 provide a graphical illustration of same.

19

20

21

22

23

24

Sources of Supply to Meet Design Firm Peak Day Requirement

	<u>2011/12 Gas Year</u>		<u>2012/13 Gas Year</u>	
	(GJ/day)	(%)	(GJ/day)	(%)
Centra Supply	86,745	18.5%	134,142	28.8%
WTS Supply	24,455	5.2%	20,058	4.3%
Total Supply - FT/ STFT	111,200	23.7%	154,200	33.1%
Primary Gas Delivered Service	80,000	17.0%	25,000	5.4%
Oklahoma Supply	7,860	1.7%	7,860	1.7%
Michigan Supply			21,000	4.5%
Storage Withdrawal	208,591	44.4%	208,591	44.7%
Peaking Delivered Services	62,449	13.3%	49,709	10.6%
	<u>470,100</u>	<u>100%</u>	<u>466,400</u>	<u>100%</u>

1

2 At the beginning of the winter, under the assumption of a normal weather year, natural
 3 gas is dispatched daily using Primary Gas, US supplies, Storage, and Peaking Delivered
 4 Services to meet both Firm and Interruptible requirement. As the winter progresses,
 5 Centra monitors the extent to which the weather has varied from normal and the
 6 resulting storage inventory levels. If it is determined that storage withdrawals are greater
 7 than planned, Centra would curtail Interruptible customers as required to conserve
 8 storage gas for the firm market, such that it would be able to supply the maximum year
 9 firm requirement from that point to the end of the winter. Curtailment of Interruptible
 10 customers may also be implemented to ensure that the firm load is met during a
 11 particular day's colder than normal weather. In the event that curtailment is required,
 12 Centra endeavours to provide Interruptible Class customers with Alternate Supply
 13 Service.

14

1 **Transportation and Storage Arrangements**

2 **TransCanada Pipelines (“TCPL”) Transportation**

3 Primary Gas supplies purchased or received at Empress, either as Centra supply or
4 WTS supply, are transported from Western Canada to Saskatchewan and Manitoba by
5 way of Firm Transportation (“FT”) or Short-Term Firm Transportation (“STFT”) on
6 TCPL’s Mainline. The majority of Centra’s customers receive natural gas service through
7 meter stations on the Mainline in the MDA while a relatively small number of customers
8 in the Parkland area are supplied from a meter station that is located in Saskatchewan
9 and is part of the Southern Saskatchewan Delivery Area (“SSDA”) on the Mainline
10 system. Please see Appendix 10.3 of Tab 10 for a map of these sections of the TCPL
11 system.

12

13 Centra holds Storage Transportation Service (“STS”) on TCPL between the MDA and
14 Emerson, which facilitates the refill of storage in summer months and also provides
15 access to storage inventory in winter months to serve the load. As of November 1, 2012,
16 Centra also holds FT from Emerson to the MDA, which helps offset deliverability forgone
17 by de-contracting FT from Empress to the MDA, thereby contributing to meeting
18 deliverability requirements. It also provides the benefit of supply basin diversification as it
19 allows greater access to U.S. markets.

20

21 **ANR and GLGT – Transportation and Storage**

22 Centra leases ANR storage capacity in Michigan, which requires related transportation
23 on the ANR and GLGT pipelines. The storage and related transportation assets are
24 used to improve Centra’s transportation load factor from Western Canada. Storage

1 allows Centra to reduce the unutilized demand charges associated with the use of
2 transportation capacity at a low sales load factor. This portfolio of U.S. assets also
3 enhances reliability, diversity and security of supply. Centra's forecast transportation
4 load factor from Western Canada for the 2012/13 Gas Year is approximately 96%
5 compared to a forecast sales load factor of approximately 30%.

6

7 In previous Applications, Centra referred to the "backhaul" of natural gas from storage to
8 the Manitoba market which referred to the transportation of natural gas by displacement
9 on a pipeline system. However, changes in the industry have resulted in the reversal of
10 physical flows on segments of GLGT and TCPL on occasion, depending on pipeline
11 nominations and operating conditions. Accordingly, Centra will no longer use the term
12 "backhaul" to describe the movement of gas from storage in Michigan to the Manitoba
13 load, rather, Centra has adopted the terminology of "transporting" storage gas to
14 describe the way in which storage gas reaches the Manitoba market.

15

1 **10.1.1 Operation of Current Gas Portfolio (to March 31, 2013)**

2 ***Summer Operation (April 1 through October 31)***

3 Please see Appendix 10.4 of Tab 10 for a map that outlines the summer operation of
4 Centra's current Gas Portfolio (to March 31, 2013).

5

6 In the summer months under Centra's current portfolio, Centra purchases Western
7 Canadian gas supplies under its Primary Gas supply contract and transports these and
8 marketer supplies on its FT and STFT capacity on TCPL's Mainline to meet the firm
9 Manitoba market requirement. Primary Gas Delivered Service is also used to serve the
10 market.

11

12 Any Manitoba load requirement in excess of Centra's deliverability is usually met through
13 the purchase of incremental supplies delivered directly to Manitoba through
14 Supplemental Gas Peaking Delivered Service arrangements. Interruptible customers
15 may also be curtailed whenever forecast demand exceeds Centra's deliverability.

16

17 Once the firm Manitoba market requirement has been met, excess transportation
18 capacity can be used to refill storage in Michigan, to serve Interruptible load, or be
19 released to third parties where feasible and economic.

20

21 At the conclusion of a winter season, Centra determines the amount of gas required to
22 be purchased, transported and injected to refill its storage capacity. Once the storage
23 refill requirement is known, Centra accomplishes storage refill by transporting gas under
24 its transportation contracts in the following order:

- 1 1. TCPL FT from Empress to the MDA (up to 54,000GJ/day to storage of 110,000
- 2 GJ/day);
- 3 2. TCPL STS from the MDA to Emerson (up to 54,000 GJ/day);
- 4 3. GLGT FT from Emerson to the interconnect with ANR at Crystal Falls, Michigan
- 5 (up to 53,351 GJ/day); and
- 6 4. ANR Firm Transportation Service (“FTS”) from Crystal Falls to ANR storage
- 7 facilities in Northern Michigan (up to 52,448 GJ/day).

8

9 In addition to the capacities listed above, Centra holds 7,860 GJ/day of annual FTS on
10 ANR’s southwest system to transport Oklahoma supplies to storage as required, and
11 22,380 GJ/day on ANR’s southeast system for the summer season to assist in refilling
12 storage with Louisiana supplies as required.

13

14 ***Winter Operation – (November 1 through March 31)***

15 Please see Appendix 10.5 of Tab 10 for a map that depicts the winter operation of
16 Centra’s current Gas Portfolio (to March 31, 2013).

17

18 During winter months under Centra’s current Gas Portfolio, the Manitoba market
19 requirement is met first with a combination of natural gas purchased under Centra’s
20 Primary Gas supply contract and Primary Gas received from marketers (for customers
21 under WTS arrangements), which is transported to the load using a combination of
22 TCPL FT and STFT, as well as with Primary Gas Delivered Service arrangements.
23 Centra may also use its annual FTS contract of 7,860 GJ/day on ANR’s southwest

1 system to transport Oklahoma supplies to GLGT and/or purchases of Michigan supply
2 for transport on GLGT to satisfy daily market demand.

3

4 In addition, Centra holds seasonal storage in Michigan and utilizes ANR, GLGT and
5 TCPL pipelines to supply the Manitoba market with gas from storage during winter
6 months. Centra holds seasonal storage capacity of 15.5 petajoules ("PJ") which provides
7 a maximum winter deliverability of 208,591 GJ/day, net of pipeline compressor fuel. For
8 the 2011/12 Gas Year, storage inventory was comprised of approximately 66% Primary
9 Gas and 34% Supplemental Gas.

10

11 To meet the market requirement, storage volumes and/or U.S. supplies are transported
12 back to Manitoba using Centra's transportation contracts in the following order:

- 13 1. ANR FTS from the storage facility to the GLGT interconnect at Deward, Michigan
14 (up to 208,591 GJ/day);
- 15 2. GLGT FT from Deward to Emerson (up to 237,388 GJ/day); and,
- 16 3. TCPL STS from Emerson to the MDA (up to 215,614 GJ/day).

17

18 Oklahoma supply, Michigan and/or Emerson supplies, and storage withdrawals are
19 transported to Manitoba using TCPL STS (referenced above) and TCPL FT from
20 Emerson to the MDA (21,000 GJ/day) to satisfy the daily market requirement.

21

22 Any Manitoba load requirement in excess of Centra's deliverability is usually met through
23 the purchase of incremental supplies delivered directly to Manitoba through
24 Supplemental Gas Peaking Delivered Service arrangements. Interruptible customers

1 may also be curtailed to conserve storage inventories or whenever forecast demand
2 exceeds Centra's deliverability.

3

4 Centra will serve the Manitoba market requirement with this portfolio until March 31,
5 2013 when these arrangements expire.

6

7 **10.1.2 Changes to Current Portfolio since 2011/12 Cost of Gas Application**

8 Since the 2011/12 COG Application filed in January 2011, Centra has introduced a
9 number of changes to the operation of the Canadian assets in its current Gas Portfolio.

10

11 As discussed in previous applications, Centra is concerned with high tolls on the TCPL
12 Mainline and the Mainline's competitive position as an outlet for gas from the WCSB.
13 Centra has de-contracted the amount of FT held on the Mainline from Empress in an
14 effort to reduce its fixed costs in the current, uncertain toll environment. The table below
15 shows Centra's contracted FT capacity from Empress for the last three Gas Years:

	TCPL FT Capacity from Empress (GJ/day)		
Gas Year	2010/11	2011/12	2012/13
MDA Deliveries	135,000	110,000	90,000
SSDA Deliveries	2,200	1,200	1,200

16

17 In keeping with the approach used in the 2010/11 Gas Year, Centra determined that
18 replacing the deliverability associated with Empress supply and FT capacity on TCPL
19 with Primary Gas Delivered Service for the 2011/12 Gas Year was the most economic
20 alternative. This provided Centra with the financial benefit of reducing fixed costs

1 associated with annual FT, and the flexibility of increasing deliverability as required on a
2 monthly basis depending on the Manitoba market requirement.

3

4 For the 2012/13 Gas Year, Centra chose to further de-contract FT from Empress on the
5 TCPL Mainline and replace this deliverability with a combination of STFT and Primary
6 Gas Delivered Service. This combination of short-term assets allows Centra to respond
7 to an increased market requirement during cold months (i.e. to “load shape”) without
8 incurring the fixed costs associated with annual FT. Centra contracted for less Primary
9 Gas Delivered Service during the 2012/13 Gas Year compared to previous years as the
10 economic benefit associated with these arrangements has diminished. Primary Gas
11 Delivered Service provides for a degree of supplier diversity in Centra’s supply portfolio
12 and enables Centra to remain active and current in the market for short-term supplies.

13

14 In addition to the changes noted above, Centra has also contracted for 21,000 GJ/day of
15 annual TCPL FT from Emerson to the MDA. This firm capacity helps Centra meet its
16 deliverability requirement while reducing transportation levels from Empress, and also
17 provides the benefit of supply basin diversification as it allows greater access to U.S.
18 markets.

19

20 Centra purchased the majority of its Primary Gas requirement under a three-year
21 contract that expired on October 31, 2012. Centra issued a Request for Proposal
22 (“RFP”) for Western Canadian gas supply on April 27, 2012 and proposals were
23 received on May 14, 2012. Centra identified a short-list of proposals based on
24 established criteria and pursued negotiations with those proponents. As a result of the

1 negotiations, a two-year supply contract was executed with the successful proponent,
2 ConocoPhillips, effective November 1, 2012. Consistent with past practice followed in
3 2009/10, the contract and scoring matrix have been filed in confidence with the PUB.

4

5 All of the above-noted changes have been incorporated into the operation of Centra's
6 existing Gas Portfolio. The 2012/13 Gas Year comprises the final five months of
7 Centra's existing Gas Portfolio that expires on March 31, 2013 and the first seven
8 months of its new Gas Portfolio, which takes effect on April 1, 2013. The preceding
9 discussion outlines how Centra has operated its existing Gas Portfolio for the 2010/11
10 and 2011/12 Gas Year, as well as the winter season of the 2012/13 Gas Year. The
11 following sections provide a description of how Centra will operate its new Gas Portfolio.

12

13 **10.1.3 Operation of New Gas Portfolio (commencing April 1, 2013)**

14 The operation of the new Gas Portfolio is scheduled to commence on April 1, 2013. The
15 total Gas Portfolio cost for Gas Year 2012/13 on a forecast basis is \$204.2 million
16 (Schedule 10.12.3 a, line 57), which comprises the operation of Centra's current Gas
17 Portfolio for the winter of 2012/13 and its new Gas Portfolio for the summer of 2013.
18 Specifically, Centra's existing GLGT and ANR contracts expire on March 31, 2013.
19 Following an application (The Transportation & Storage Application) filed with the PUB
20 on March 23, 2012, Centra received approval of the fixed costs associated with new
21 contractual arrangements for natural gas storage and related transportation with ANR
22 and GLGT. The new contracts provide for total annual storage capacity of 15.5 PJ with
23 215,614 GJ/day (net of pipeline compressor fuel) of storage deliverability and related
24 pipeline capacity on GLGT and ANR. The total annual fixed cost for these arrangements

1 is approximately \$14 million USD, which will remain fixed for each year of the seven year
2 term, beginning April 1, 2013.

3

4 Under the new arrangements, Centra will hold seasonal storage capacity with ANR in
5 the amount of 8.1 PJ. This storage capacity has the same characteristics as Centra's
6 current ANR seasonal storage service, which limits injections to summer and
7 withdrawals to winter and allows storage gas to be cycled up to 1.0 times annually.

8

9 Centra has added 7.4 PJ of annual storage capacity to its new Gas Portfolio, which
10 allows both injections and withdrawals in any season and allows storage gas to be
11 cycled up to 1.42 times annually as per ANR's tariff. Centra can inject up to 42,286
12 GJ/day into the annual storage, including during the winter months. Winter injections,
13 combined with the ability to cycle storage up to 1.42 times, effectively provides Centra
14 with the ability to cycle an additional 3.1 PJ (7.4 PJ x 42%) of gas through storage
15 annually. Generally, this flexibility may allow Centra to hold less TCPL capacity from
16 Western Canada to Manitoba in winter, as the ability to refill storage in winter reduces
17 the need to manage storage levels with WCSB purchases. Centra has combined the
18 annual storage with firm winter transportation on ANR from the Joliet Hub to storage to
19 access Chicago supply.

20

21 The basic premise by which Centra operates its new Gas Portfolio will be similar to the
22 operation of its existing Gas Portfolio, as it will rely on storage and related U.S.
23 transportation assets to serve the load in winter months and refill storage in summer
24 months. However, while certain components of the existing portfolio have been

1 eliminated, such as long haul transport contracts on ANR from Louisiana and Oklahoma,
 2 Centra has added new features to its portfolio, such as short haul transportation from the
 3 Chicago market to storage and increased storage deliverability. These new features are
 4 addressed in the discussion of the summer and winter operation of Centra's new Gas
 5 Portfolio in the following sections.

6

7 The following chart compares the storage and transportation capacities of the U.S.
 8 contracts associated with the existing and the new Gas Portfolios.

ANR/GLGT Capacities - US and Canadian Units

	<u>Current GST&S Portfolio</u> <i>(up to March 31, 2013)</i>		<u>New GST&S Portfolio</u> <i>(begins April 1, 2013)</i>	
	Dth	GJ	Dth	GJ
1) <u>ANR Storage - Seasonal</u>				
Capacity	14,700,000	15,509,323	7,677,318	8,100,000
Deliverability	200,310	211,338	89,400	94,322
2) <u>ANR Storage - Annual</u>				
Capacity	NA	NA	7,013,846	7,400,000
Deliverability	NA	NA	117,000	123,442
Storage totals - Capacity	14,700,000	15,509,323	14,691,164	15,500,000
- Deliverability	200,310	211,338	206,400	217,764
<u>ANR Transportation</u>				
3) Crystal Falls to storage (summer)	49,711	52,448	50,200	52,964
4) Joliet to storage (summer)	NA	NA	7,000	7,385
5) Storage to GLGT (winter)	197,706	208,591	204,363	215,614
6) Joliet to storage (winter)	NA	NA	40,000	42,202
ANR SW (annual)	7,450	7,860	NA	NA
ANR SE (summer)	21,212	22,380	NA	NA
<u>GLGT Transportation</u>				
7) Emerson to Crystal Falls (summer)	50,567	53,351	50,500	53,280
8) ANR to Emerson (winter)	225,000	237,388	224,363	236,716

9

1 **Summer Operation (April 1 through October 31)**

2 Please see Appendix 10.6 of Tab 10 for a map that outlines the summer operations
3 under Centra's new Gas Portfolio beginning April 1, 2013.

4

5 Centra will continue to purchase Western Canadian gas supplies under its Primary Gas
6 supply contract and transport these and marketer supplies on its FT and STFT capacity
7 on TCPL's Mainline to meet the firm Manitoba market requirement. Primary Gas
8 Delivered Service arrangements may also be used to meet this requirement.

9

10 TCPL FT from Emerson to the MDA will also be used to meet the Manitoba market
11 requirement with gas purchased at Emerson.

12

13 Any Manitoba load requirement in excess of Centra's deliverability will continue to be
14 met through the purchase of incremental supplies delivered directly to Manitoba through
15 Supplemental Gas Peaking Delivered Service arrangements. Interruptible customers
16 may also be curtailed whenever forecast demand exceeds Centra's ability to provide and
17 deliver supply under its contractual arrangements.

18

19 Once the firm Manitoba market requirement has been met, excess transportation
20 capacity can be used to refill storage in Michigan, to serve Interruptible load, or be
21 released to third parties where feasible and economic.

22

23 The storage refill will be accomplished utilizing the following transportation contracts in
24 the new Gas Portfolio:

- 1 1. TCPL FT from Empress to the MDA (up to 54,000 GJ/day to storage of 90,000
- 2 GJ/day);
- 3 2. TCPL STS from the MDA to Emerson, Manitoba (up to 54,000 GJ/day);
- 4 3. GLGT FT from Emerson to the interconnect with ANR at Crystal Falls, Michigan
- 5 (up to 53,280 GJ/day); and,
- 6 4. ANR FTS from Crystal Falls to the ANR Pipeline storage facilities in Michigan
- 7 (up to 52,964 GJ/day).

8

9 In addition to maintaining GLGT FT summer capacity from Emerson to Crystal Falls and
10 ANR FTS summer capacity from Crystal Falls to Storage for summer storage refill,
11 Centra has added new FTS capacity on ANR from the Joliet Hub to Storage of 7,385
12 GJ/day to access Chicago supply.

13

14 **Winter Operations (November 1 through March 31)**

15 Please see Appendix 10.7 of Tab 10 for an illustration of how Centra will operate its new
16 Gas Portfolio during the winter season.

17

18 As with the previous Gas Portfolio, the Manitoba market requirement will be met first with
19 natural gas purchased under Centra's Primary Gas supply contract and Primary Gas
20 received from marketers (for customers under WTS arrangements) and transported to
21 the load using a combination of TCPL FT and STFT. Primary Gas Delivered Service
22 arrangements may also be used to serve the market. Centra may also use purchases of
23 Michigan supply for transport on GLGT to satisfy daily market demand.

24

1 Over and above these capabilities, Centra will transport gas withdrawn from storage on
2 the ANR, GLGT and TCPL pipelines to supply the Manitoba market during winter
3 months. Centra will hold storage capacity of 15.5 PJ (8.1 PJ of seasonal storage and
4 7.4 PJ of annual storage), which provides for a maximum winter deliverability of 215,614
5 GJ/day, net of pipeline compressor fuel.

6

7 To meet the market requirement, storage volumes and/or U.S. supplies will be
8 transported back to Manitoba using Centra's transportation contracts in the following
9 order:

- 10 1. ANR FTS from the ANR storage facility to the GLGT interconnect at Deward,
11 Michigan (up to 215,614 GJ/day);
- 12 2. GLGT FT from Deward to Emerson (up to 236,716 GJ/day); and
- 13 3. TCPL STS from Emerson to the MDA (up to 215,614 GJ/day).

14

15 Also included in Centra's new Gas Portfolio for use during the winter months is 42,202
16 GJ/day of ANR FTS capacity from the Joliet Hub to ANR storage, which will enable
17 Centra to manage its storage levels with access to Chicago supply.

18

19 Michigan and/or Emerson supplies and storage withdrawals are transported to Manitoba
20 using TCPL STS (referenced above) and TCPL FT from Emerson to the MDA (21,000
21 GJ/day) to satisfy daily market demand.

22

23 Any Manitoba load requirement in excess of Centra's deliverability is usually met through
24 the purchase of incremental supplies delivered directly to Manitoba through

1 Supplemental Gas Peaking Delivered Service arrangements. Interruptible customers
2 may also be curtailed to conserve storage or whenever forecast demand exceeds
3 Centra's deliverability.

4

5 **10.2 Capacity Management Program**

6 The objective of Centra's Capacity Management Program is to optimize the use of its
7 Gas Portfolio to minimize the costs related to the portfolio, while first and foremost
8 ensuring Centra's ability to meet the Manitoba market requirement. Centra enters into
9 transactions with a number of counterparties to meet this objective. Please see
10 Appendix 10.8 of Tab 10 for a description of the types of Capacity Management ("CM")
11 transactions that Centra utilizes.

12

13 The need to use an asset in serving the Manitoba market requirement is the first
14 determinant in assessing the potential for CM revenues. If an asset is deemed to be
15 excess for a day/month/season, Centra assesses factors such as changing prices and
16 basis differentials in the various markets and potential counterparty interest in the
17 transaction to determine the value associated with any particular arrangement. The
18 market value of capacity is dependent on the market value for natural gas delivered to a
19 particular market area and, as such, is subject to day-to-day and intra-day fluctuations.

20

21 In order to generate CM revenues there must be an alternate market for that service
22 willing to pay a price that covers any incremental costs involved in the transaction and
23 also provide some recovery of the underlying cost of the asset.

24

1 Due to fluctuations in weather, pricing and basis differentials, it is difficult to forecast the
2 revenue that may be earned through CM transactions. The five-year rolling average of
3 actual CM revenue serves as a benchmark to estimate the CM credit to be embedded
4 prospectively in customers' transportation rates each year in advance of the realization
5 of these revenues.

6

7 As outlined in Section 10.6, CM revenue for the 2010/11 Gas Year was \$5.3 million
8 (excluding carrying costs). This amount was \$1.6 million less than the forecast amount
9 of \$6.9 million that was calculated using the five-year rolling average of actual results for
10 the period from November 1, 2005 through October 31, 2010. During the 2010/11 Gas
11 Year, capacity release transactions accounted for 87% of CM revenue, with the
12 remaining 13% earned by virtue of exchanges. Of the \$4.6 million earned through
13 capacity releases, almost three quarters of that was attributable to the sale of
14 transportation by virtue of credits earned using the FT-Risk Alleviation Mechanism ("FT-
15 RAM") on the TCPL Mainline (embedded in the "diversions" reporting category). The
16 remaining one quarter was earned by releasing capacity on the ANR and GLGT
17 pipelines. The variance between actual and forecast for 2010/11 is due primarily to
18 Centra having less TCPL capacity available for release compared to prior years,
19 combined with low basis differentials between Manitoba and Eastern markets during the
20 winter exchange season.

21

22 As outlined in section 10.9, during the 2011/12 Gas Year Centra earned \$6.4 million
23 (excluding carrying costs) in CM revenue relative to the forecast amount of \$6.4 million
24 that was determined by the five-year rolling average of actual results for the period from

1 November 1, 2006 through October 31, 2011. For the 2011/12 Gas Year, almost all CM
2 revenue was attributable to capacity release transactions, while revenue associated with
3 exchanges totalled only \$0.2 million. Again, approximately three-quarters of the CM
4 revenue associated with capacity releases was earned through the sale of transportation
5 by virtue of credits earned using the FT-RAM on the TCPL Mainline, with the remainder
6 attributable to revenue from releases of capacity on the ANR and GLGT pipelines.

7

8 The amount embedded in the forecast for the 2012/13 Gas Year is the most recent five-
9 year rolling average of actual CM revenue of \$6.3 million (Schedule 10.12.3 b, line 56),
10 which is based on actual results for the period from November 1, 2007 through October
11 31, 2012.

12

13 In Order 112/12, issued on August 23, 2012 in respect of Centra's Transportation &
14 Storage Portfolio Application, the PUB directed Centra to provide the monthly totals of its
15 CM revenue broken down by type of transaction and reflected as a percentage of the
16 costs associated with the operation of each component of Centra's existing and new
17 Gas Portfolio. In response to this directive, Centra has provided a more fulsome
18 description above of CM revenue earned in the 2010/11 and 2011/12 Gas Years.
19 Centra is currently extracting information from its electronic gas management system
20 and actively working to organize the data to develop the necessary reporting that would
21 provide the monthly breakdown of CM revenue attributable to each component of the
22 Gas Portfolio. Centra will file this information with the PUB once it is compiled.

23

24

1 **10.3 TCPL and Related Matters**

2 The TCPL Mainline physically transports all natural gas supplies that are consumed in
3 Centra's service territory. Centra's gas supply, planning, and operations are significantly
4 influenced and affected by the current and future business environment experienced by
5 the Mainline.

6

7 Over the past decade, the Mainline has experienced dramatic business challenges. A
8 persistent trend of shipper de-contracting on the Mainline has resulted in the current
9 situation where flows on the pipeline are consistently less than half of its capacity. This
10 situation has been exacerbated by the emergence of unconventional shale gas
11 resources in basins closer to major consuming regions.

12

13 Since 2006, the level of contracting for long-haul FT has declined on the Mainline by
14 approximately 70%. The level of the benchmark final Eastern Zone Toll ("EZT") in 2006
15 was \$0.94/GJ. By comparison, the National Energy Board ("NEB") approved an interim
16 2011 EZT effective March 1, 2011 of \$2.24/GJ, which continues to be in effect. These
17 toll levels are reflected in the gas cost forecast in this Application.

18

19 TransCanada filed its Business and Services Restructuring and Mainline 2012-2013
20 Tolls Application (the "Restructuring Proposal") with the NEB on September 1, 2011.
21 The oral hearing commenced on June 4, 2012 and concluded on December 5, 2012. A
22 multitude of stakeholders participated in the process with varying degrees of
23 intervention.

24

1 Centra registered as an intervener in this matter and participated in the associated
2 regulatory process, including the filing of evidence, cross-examination, and the filing of
3 written final argument.

4

5 Centra will continue to adapt to changes in the natural gas marketplace and the overall
6 business environment within which it is operating, recognizing that it has certain
7 limitations given the extent to which it is reliant on the Mainline. Although the NEB
8 proceeding on the matter of TransCanada's Restructuring Application is expected to
9 establish tolls for 2012 and 2013, in all likelihood, considerable toll uncertainty will
10 continue to exist post-2013.

11

12 **10.4 Description of 2010/11 Gas Year Costs and PGVAs**

13 In this Application Centra is requesting approval of gas cost deferral accounts to October
14 31, 2012, as Centra's gas cost deferral accounts are managed over Centra's Gas Year
15 from November 1 through October 31. Centra also requests approval for non-Primary
16 Gas rates effective August 1, 2013 for the forecast period of November 1, 2012 to
17 October 31, 2013.

18

19 Centra is seeking final approval of the 2010/11 & 2011/12 Gas Year costs, which are
20 summarized in Schedule 10.4.0 and 10.8.0. As shown on line 62 of Schedule 10.4.0,
21 total gas costs for the 2010/11 Gas Year are \$251.3 million. As shown on line 63 of
22 Schedule 10.8.0, total gas costs for the 2011/12 Gas Year are \$160.1 million.

23

1 Centra is requesting that rate riders to dispose of the accumulated balances in its non-
2 Primary Gas cost deferral accounts to October 31, 2012 be implemented on August 1,
3 2013, coincident with its routine Primary Gas rate change to occur effective that date. As
4 such, the accumulated gas cost deferral balances have been carried forward, including
5 carrying costs, to July 31, 2013, resulting in a forecast balance of \$0.01 million owing to
6 Centra. These balances are summarized in Schedule 10.11.0.

7

8 Schedules 10.4.1 through 10.7.2 provide the details of all gas cost deferral balances for
9 the period from November 1, 2010 through October 31, 2011 and Schedules 10.8.1
10 through 10.10.1 summarize the period of November 1, 2011 through October 31, 2012.
11 Schedule 10.11.0 provides a summary to July 31, 2013 of gas cost deferral balances for
12 the 2010/11 and 2011/12 Gas Years, as well as the residual balance of 2009/10 and
13 earlier prior period gas deferrals. All schedules include a forecast of the carrying costs
14 from November 1, 2012 to July 31, 2013. Section 10.12 provides a discussion and
15 estimate of gas costs for the forecast period of November 1, 2012 to October 31, 2013.

16

17 On November 1, 2010 new non-Primary Gas Purchased Gas Variance Accounts
18 ("PGVA") and other gas cost deferral accounts were created to accumulate gas cost
19 deferral inflows and outflows during Centra's 2010/11 Gas Year from November 1, 2010
20 to October 31, 2011.

21

22 The following sections are organized in terms of the accumulations in each PGVA and
23 non-Primary Gas cost deferral account for the period from November 1, 2010 to October

1 31, 2011. These balances are then carried forward to July 31, 2013 to include carrying
2 costs for the period of November 1, 2011 to July 31, 2013.

3

4 The Primary Gas, Supplemental Gas, and Distribution PGVA balances for the months of
5 November 2010 through May 2011 have incorporated an actual Unaccounted for Gas
6 (“UFG”) percentage of 1.01% of total receipts into the Centra system, based upon the
7 12-month UFG true-up that was conducted in the summer of 2011.

8

9 **10.4.1 2010/11 Gas Year Primary Gas PGVA**

10 The Primary Gas PGVA captures the cost of Primary Gas purchases from Western
11 Canada flowing directly to the load on TCPL Mainline FT capacity held by Centra,
12 Primary Gas Delivered Service, Primary Gas withdrawn from storage to meet the
13 Manitoba market requirement, compressor fuel on the TCPL system to transport Primary
14 Gas purchases from Alberta to Manitoba, load balancing agreement fees on the TCPL
15 system and hedging impacts. Primary Gas supplies used to support the UFG
16 requirement are removed from this account and transferred to the Distribution PGVA.

17

18 Details pertaining to the Primary Gas PGVA for the period from November 1, 2010 to
19 October 31, 2011 have been provided for information purposes only. While Centra is
20 requesting final approval of actual Primary Gas costs for the 2010/11 Gas Year, it is not
21 seeking any change to Primary Gas rates in this Application as Primary Gas rates are
22 adjusted each quarter through Primary Gas rate applications using the RSM approved
23 by the PUB.

24

1 Schedule 10.4.1 sets out the 2010/11 Gas Year's monthly detail for the account. The
2 total October 31, 2011 balance, including carrying costs, is \$2.2 million owing to
3 customers as shown on line 25 of Schedule 10.4.1. The cost inflows and outflows are
4 based on actual results to October 31, 2011.

5

6 This account operates on a continuum, with the resulting balance at the end of each gas
7 quarter being amortized through a revised Primary Gas rate rider as part of the quarterly
8 Primary Gas RSM. As a result, there are no approved annual Primary Gas PGVA cost
9 inflows and Weighted Average Cost of Gas ("WACOG") outflows against which to
10 compare actual results. Therefore, no variance analysis of the Primary Gas PGVA is
11 provided.

12

13 **10.4.2 2010/11 Gas Year Supplemental Gas PGVA**

14 The Supplemental Gas PGVA captures the cost of U.S. purchases, Supplemental Gas
15 Delivered Service, and Supplemental Gas withdrawn from storage to meet the load
16 requirement. Since 2011, Centra has been placing greater reliance on Delivered
17 Services to mitigate exposure to the escalating tolls on the TransCanada Mainline.
18 These increased amounts of Delivered Service supplies, in lieu of holding equivalent
19 amounts of FT capacity on the TransCanada Mainline, were originally classified as
20 Supplemental Gas and were considered as such in the forecast. However, this
21 classification resulted in negative impacts on marketers and the potential for wider
22 variations to Firm customers' billing percentages and as a result, it was determined that
23 these specific Delivered Service volumes would be more appropriately re-categorized as
24 Primary Gas supplies from April 1, 2011 forward. The Primary Gas supply category

1 identified on Schedule 10.4.1 line 3, Primary Gas Delivered Service, represents the re-
2 categorized supplies for the post-March 31, 2011 period that were originally categorized
3 as Supplemental Gas Peaking Delivered Service on Schedule 10.4.2(a) line 5.

4

5 Schedule 10.4.2(a) sets out the monthly detail for the account. The cost inflows and
6 outflows are based on actual results from November 1, 2010 to October 31, 2011. The
7 total October 31, 2011 balance is \$9.6 million owing to customers (line 24). After the
8 inclusion of carrying costs for the period from November 2011 to July 2013, the 2010/11
9 Gas Year Supplemental Gas PGVA balance on July 31, 2013 is \$9.9 million owing to
10 customers (line 53). Centra requests the implementation of rate riders to refund this
11 amount to customers commencing August 1, 2013.

12

13 Schedule 10.4.2(b) shows a comparison of actual and approved Supplemental Gas
14 PGVA inflows and outflows, which helps to identify the major contributors to the residual
15 balance. Supplemental cost inflows, net of UFG costs transferred to the Distribution
16 PGVA, were \$0.5 million greater than approved costs (line 13).

17

18 Line 2 of Schedule 10.4.2(b) provides a comparison of actual and approved Oklahoma
19 supply gas costs. Inflows were \$0.2 million less than forecast due to both lower index
20 prices and lower than budgeted volumetric purchases for the applicable period.
21 Forecasted prices were set using a November 1, 2010 forward strip and actual average
22 index prices for supplies came in slightly lower than forecast resulting in a variance of
23 \$0.1. The remaining \$0.1 million of the total variance is attributable to purchases that
24 were 36,000 GJs less than forecast.

1 As shown on line 3 of Schedule 10.4.2(b), Supplemental Gas storage utilization was
2 \$3.9 million greater than forecast. Actual weather during the January through March
3 2011 period was 7% colder than normal, creating the requirement to withdraw additional
4 Supplemental Gas supplies from storage.

5

6 Line 4 of Schedule 10.4.2(b) displays the Supplemental storage gas portion of
7 exchanges with counterparties for CM transactions, which are priced on the same basis
8 as regular Supplemental Gas storage withdrawals, totalling \$2.2 million. These
9 additional storage withdrawals were also driven by the colder than normal weather. CM
10 revenues are discussed in Section 10.2.

11

12 Line 5 of Schedule 10.4.2(b) shows a \$5.9 million negative variance related to
13 Supplemental Gas Peaking Delivered Service. 9.9 million GJs of Supplemental Gas
14 Peaking Delivered Service purchases were forecast for the 2010/11 Gas Year. By
15 comparison, actual purchases totalled 8.2 million GJs. The lower Supplemental Gas
16 Peaking Delivered Service purchase volumes reduced Supplemental inflows by \$6.2
17 million. This was offset by a \$0.3 million positive variance due to slightly higher than
18 forecast average commodity costs for these supplies.

19

20 Lines 6 of Schedule 10.4.2(b) displays the \$0.6 million of purchases for Alternate Supply
21 Service acquired for Interruptible customers in lieu of curtailment in the months of April
22 and May 2011. For forecasting purposes, Interruptible consumption over and above pre-
23 contracted supplies is considered to be curtailed and therefore, Alternate Supply Service

1 is not included in the forecast. In the 2010/11 Gas Year 147,431 GJ's of Alternate
2 Supply Service purchases were required.

3

4 Line 12 of Schedule 10.4.2(b) presents the transfer of Supplemental Gas cost inflows
5 pertaining to the UFG True-up. As noted above, the actual UFG percentage of 1.01% for
6 the months of June 2010 through May 2011 was greater than the 0.90% forecast,
7 resulting in a reallocation of \$0.06 million to the Distribution PGVA.

8

9 Total Supplemental Gas PGVA Inflows, as indicated on Schedule 10.4.2(b) line 13, were
10 \$0.5 million greater than forecast.

11

12 Schedule 10.4.2 (b), line 16, compares actual versus forecast Supplemental Gas PGVA
13 WACOG outflows. WACOG outflows were \$9.4 million greater than forecast, which was
14 mainly the result of an over-recovery of costs during the period of November 2010
15 through April 2011 as reduced Supplemental Gas base rates flowing from Centra's
16 2011/12 Cost of Gas Application were not implemented until May 1, 2011.

17

18 Line 17 of Schedule 10.4.2 (b) identifies the corresponding WACOG outflow related to
19 Alternate Supply Service volumes delivered to Interruptible customers in lieu of
20 curtailment in April and May 2011. Costs incurred relating to Alternate Supply Service
21 are fully recovered from customers electing to take the service and therefore, line 17 and
22 line 6 of Schedule 10.4.2(b) correspond directly to one another. As Alternate Supply
23 Service is not forecast, WACOG outflows are \$0.6 million greater than forecast as a
24 result.

1 Total Supplemental Gas PGVA outflows, as indicated on Schedule 10.4.2(b) line 18,
2 were \$9.9 million greater than forecast.

3

4 The Supplemental Gas PGVA balance at October 31, 2011, as indicated on line 24 of
5 Schedule 10.4.2(a), is \$9.6 million owing to customers including carrying costs. After the
6 inclusion of carrying costs for the months of November 2011 through July 2013, the July
7 31, 2013 closing balance in the Supplemental Gas PGVA is a credit balance of \$9.9
8 million owing to customers (Schedule 10.4.2 (a) line 53).

9

10 **10.4.3 2010/11 Gas Year Transportation PGVA**

11 This account includes the costs associated with the transportation of supplies on various
12 Canadian and US pipeline systems and the costs for leasing US storage capacity. While
13 most of these costs are fixed charges independent of the volume transported, it also
14 includes certain variable transport costs and other costs such as TCPL Balancing Fees
15 and imputed transportation costs associated with Primary Gas Delivered Service and
16 Supplemental Gas Peaking Delivered Services.

17

18 Schedule 10.4.3(a) sets out the monthly detail for the account. The total October 31,
19 2011 balance is \$7.5 million owing to Centra as shown on line 22. The 2010/11 Gas
20 Year Transportation PGVA cost inflows and outflows are based on actual results for the
21 period from November 1, 2010 to October 31, 2011.

22

23 As Centra is seeking new Transportation rates effective August 1, 2013, Schedule
24 10.4.3(a) carries forward the balance of this account to July 31, 2013. After the inclusion

1 of carrying costs for the months from November 2011 to July 2013, the balance in this
2 account is \$7.7 million owing to Centra, as shown on line 48.

3

4 Schedule 10.4.3(b) shows a comparison of actual and approved annual Transportation
5 PGVA cost inflows and outflows.

6

7 Total fixed transportation cost inflows (Line 2 of Schedule 10.4.3(b)) were \$2.9 million
8 less than forecast. \$2.4 million of this variance is a result of reduced contracting of firm
9 transportation capacity on the TransCanada Mainline. In months where Centra was able
10 to utilize Primary Gas Delivered Service (see Schedule 10.4.1 line 3) and achieve a
11 lower overall net landed cost of gas compared to incurring fixed contract demand
12 charges with TransCanada, Centra reduced its fixed pipeline demand charges by \$2.4
13 million as compared to budget. Favourable U.S. exchange rate variances for the period
14 of April through October 2011 further reduced fixed transportation costs by an additional
15 \$0.5 million relative to forecast. For the aforementioned period the exchange rate was
16 forecast at \$1.02 CDN/USD in comparison to the actual average exchange rate of \$0.98
17 CDN/USD. In accordance with PUB Order 66/11, Centra revised its forecast,
18 incorporating actual exchange rates for the period from November 2010 through March
19 2011.

20

21 Line 3 of Schedule 10.4.3(b) indicates that variable transportation cost inflows were \$0.2
22 million less than approved. The main contributor to this variance was reduced TCPL
23 variable charges as a result of replacing Firm Mainline transportation with Primary Gas
24 Delivered Service.

1 Lines 4 and 5 of Schedule 10.4.3(b) denote the variances associated with imputed
2 transportation costs on both Primary Gas Delivered Service and Supplemental Gas
3 Peaking Delivered Services. These matters were discussed previously in Sections
4 10.4.1 and 10.4.2. In the past, Centra did not estimate the respective costs of commodity
5 and transportation embedded in the landed cost of its Delivered Service supplies due to
6 the limited proportion of the overall annual requirement they represented. As Centra
7 increasingly endeavours to mitigate its exposure to increasing tolls on the TCPL
8 Mainline, Primary Gas Delivered Service and Supplemental Gas Peaking Delivered
9 Services have become a larger percentage of Centra's overall annual requirement.
10 Therefore, in order to more precisely recognize the respective commodity and
11 transportation costs associated with these supplies, Centra has used the best
12 information available to differentiate and allocate these estimated cost components
13 through the appropriate PGVAs.

14

15 Supplemental Gas Peaking Delivered Service Imputed Transportation Costs (line 4 of
16 Schedule 10.4.3 (a) were calculated as the remaining amount after deducting estimated
17 embedded commodity costs based on the AECO Monthly 7A Index Price and the
18 Monthly AECO to Empress Transportation Basis Differential from the fully loaded unit
19 cost of Supplemental Gas Peaking Delivered Service supplies.

20

21 Primary Gas Delivered Service Imputed Transportation Costs (line 5 of Schedule 10.4.3
22 (a) were determined to be the remaining amount after the deduction of estimated
23 embedded commodity and upstream compressor fuel costs based on the AECO Monthly
24 7A Index Price, as well as the monthly AECO to Empress Transportation Basis

1 Differential. The estimation of commodity costs embedded in these supplies incorporates
2 the additional upstream compressor fuel component in order to maintain consistency
3 with the principles underlying the design of the Quarterly Variable Primary Gas Rate.
4 This rate reflects the costs of Primary Gas delivered at the Empress receipt point, plus
5 TCPL Mainline compressor fuel to deliver these supplies to Centra's distribution system
6 in Manitoba, which are reflected in the rates charged to customers for all Primary Gas
7 products in Manitoba, whether from Centra or natural gas marketers.

8

9 Supplemental Gas Peaking Delivered Service Imputed Transportation Costs were \$0.8
10 million greater than budget as shown on line 4 of Schedule 10.4.3 (b). \$1.5 million of this
11 variance is the result of imputed unit transportation costs on these supplies that were
12 greater than budgeted. Rather than being a function of high transportation costs
13 embedded in the overall cost of these supplies, this variance is more a function of the
14 large negative values at which the AECO to Empress Transportation Basis Differential
15 settled throughout the year (as great as negative \$0.28/GJ). A negative AECO to
16 Empress Transportation Basis Differential has the effect of reducing the net commodity
17 cost component of Supplemental Gas Peaking Delivered Service supplies allocated to
18 the Supplemental Gas PGVA. Correspondingly, this has the offsetting effect of
19 increasing the remaining imputed transportation cost component of these supplies
20 allocated to the Transportation PGVA, all other things being equal. The resulting unit
21 costs for imputed transportation on Supplemental Gas Peaking Delivered Service
22 supplies averaged \$0.59/GJ versus the budgeted amount of \$0.41/GJ. The offsetting
23 credit amount of \$0.7 million for this cost inflow variance pertains to lower than forecast

1 volumes as Supplemental Gas Peaking Delivered Service purchases totalled 8.2 million
2 GJs for the 2010/11 Gas Year relative to the budget of 9.9 million GJs.

3

4 Primary Gas Delivered Service Imputed Transportation Costs were \$2.4 million greater
5 than budget (line 5 of Schedule 10.4.3 (b)). The variance is the result of 3.5 million GJs
6 of purchases that were not forecast, but were subsequently incurred as Centra
7 continued to actively manage its portfolio in order to further mitigate its exposure to
8 increasing tolls on the TCPL Mainline.

9

10 Storage Gas Transportation and Delivery Costs were \$0.5 million greater than approved,
11 as shown on Schedule 10.4.3(b), line 6. Actual weather in the January through March
12 2011 period was colder than normal, thus creating the requirement to withdraw greater
13 than approved budget volumes from storage to meet the winter load.

14

15 The TCPL Load Balancing Charges for the 2010/11 Gas Year were \$0.02 million less
16 than the 2010/11 approved forecast, as shown at line 7 of Schedule 10.4.3(b),.

17

18 Line 8 of Schedule 10.4.3(b) shows miscellaneous charges of \$0.05 million that were
19 incurred resulting mainly from a U.S. Customs Merchandise Processing fee paid in
20 December 2010.

21

22 Line 9 of Schedule 10.4.3(b) indicates that actual 2010/11 Gas Year CM revenues were
23 less than forecast by \$1.6 million. CM revenues are discussed in detail in Section 10.6
24 below.

1 In summary, actual inflows to the account were \$2.1 million greater than approved
2 forecast amounts as shown on Schedule 10.4.3(b), line 11.

3

4 Line 14 of Schedule 10.4.3(b) indicates that WACOG outflows from the Transportation
5 PGVA were \$5.5 million less than forecast, with \$5.9 million of the differential attributable
6 to Transportation base rates approved for implementation on May 1 2010, which
7 remained in effect through April 30, 2011 that were insufficient to recover the increasing
8 tolls on the TransCanada Mainline. On May 1, 2011 Transportation base rates were
9 revised upwards in PUB Order 66/11 to more accurately reflect market circumstances.

10 The offsetting residual \$0.4 million Transportation PGVA WACOG outflow variance
11 results from higher than forecast throughput volumes due to colder than normal weather
12 in the 2010/11 winter period.

13

14 The net accumulation in the Transportation PGVA in the 2010/11 Gas Year is a residual
15 balance of \$7.5 million owing to Centra as of October 31, 2011. This result is displayed
16 on Schedule 10.4.3(a), line 22. The addition of carrying costs for the months from
17 November 2011 through July 2013 results in a 2010/11 Gas Year Transportation PGVA
18 balance of \$7.7 million that is recoverable from customers as of July 31, 2013. This
19 balance is shown on Schedule 10.4.3(a), at line 48.

20

21 **10.4.4 2010/11 Gas Year Distribution PGVA**

22 The Distribution PGVA captures the cost of UFG on Centra's distribution system. UFG
23 volume losses are allocated between Primary Gas and Supplemental Gas and are
24 accounted for monthly on the basis of the monthly average purchase cost of Primary

1 Gas supply and Supplemental Gas supply delivered to Manitoba. The Distribution PGVA
2 also includes charges on the Minell pipeline as an inflow to this account.

3

4 Schedule 10.4.4(a) sets out the monthly detail for the account. The Distribution PGVA
5 balance as at October 31, 2011 is \$0.5 million owing to customers (line 16). Schedule
6 10.4.4(a) carries forward the balance of this account to July 31, 2013, as Centra is
7 requesting new non-Primary Gas base rates effective August 1, 2013. With the inclusion
8 of carrying costs for the months from November 2011 through July 2013, the July 31,
9 2013 balance in this account is \$0.5 million owing to customers, as shown on line 42.

10

11 Schedule 10.4.4(b) shows a comparison of actual and approved annual cost inflows and
12 outflows for the account. UFG cost inflows into this account from the Primary Gas and
13 Supplemental Gas PGVA's were \$0.4 million greater than forecast. This is mainly a
14 result of the UFG true-up calculated in June 2011 for the period from June 1, 2010 to
15 May 31, 2011. A transfer of \$0.4 million was made from the Primary Gas and
16 Supplemental Gas PGVA's into the Distribution PGVA, as shown on line 4 of Schedule
17 10.4.4(b), due to the higher than forecast UFG experienced during the period. The actual
18 UFG percentage of 1.01% for the months of June 2010 through May 2011 was greater
19 than the forecast of 0.90%.

20

21 WACOG outflows from the Distribution PGVA were \$0.9 million greater than the
22 approved forecast (Schedule 10.4.4(b), line 10). Greater WACOG outflows are mainly
23 the result of the approved May 1, 2010 Distribution rates remaining in effect through
24 April 30, 2011, whereby the embedded commodity costs were greater than those

1 embedded in the approved Distribution base rates flowing from Centra's 2011/12 Cost of
2 Gas Application that came into effect on May 1, 2011.

3

4 The net residual balance of \$0.5 million owing to customers at October 31, 2011 is
5 shown on line 29 of Schedule 10.4.4(a). The addition of carrying cost for the months
6 from November 2011 through July 2013 results in a balance in the 2010/11 Gas Year
7 Distribution PGVA of \$0.5 million owing to customers on July 31, 2013, as displayed on
8 line 42 of Schedule 10.4.4(a).

9

10 **10.5 2010/11 Gas Year Hedging Activities**

11 Centra exited its quarterly Primary Gas hedging activity in compliance with Order
12 170/09. No Primary Gas hedges were placed after the July 6, 2010 hedging session, in
13 accordance with PUB Orders 170/09 and 93/10. The impact of the quarterly Primary Gas
14 derivatives placed for the 2010/11 Gas Year was a net gas cost addition of \$18.9 million.
15 The specifics of all derivatives hedging transactions pertaining to the 2010/11 Gas Year
16 are detailed in Schedule 10.5.0.

17

18 In January 2010, Centra placed hedges on two separate days, each comprising 37.5%
19 of eligible Primary Gas volumes. Both sets of transactions were placed for the months of
20 November 2010 through January 2011. On January 8, 2010, cashless price collars with
21 15% OTM upper bandwidths were purchased on 37.5% of eligible volumes. The
22 instruments placed on January 8th had upper strike prices set at +\$0.825 out-of-the-
23 money ("OTM") for November 2010 and +\$0.975 OTM for both December 2010 and
24 January 2011, with their corresponding lower strike prices ranging from -\$0.550 to -

1 \$0.673 OTM. The January 13th instruments' 15% OTM upper strike prices were set at
2 +\$0.825 OTM for November 2010 and +\$0.975 OTM for both December 2010 and
3 January 2011. The corresponding lower strike prices on these collars ranged between -
4 \$0.565 and -\$0.690 OTM.

5

6 On April 21, 2010, hedges were executed on 50% of eligible volumes for the months of
7 February 2011 through April 2011. The instruments placed bore 15% OTM upper strike
8 prices set at +\$0.675 OTM for all three months hedged. The corresponding lower strike
9 prices on these hedges ranged between -\$0.440 OTM and -\$0.485 OTM.

10

11 On July 6, 2010, hedges were placed on 25% of eligible volumes for the months of May
12 2011 through July 2011. The 15% OTM upper strikes on all instruments were set at
13 +\$0.675 OTM. The corresponding lower strike prices on these instruments ranged
14 between -\$0.465 OTM and -\$0.485 OTM.

15

16 No pre-paid premiums were required for the hedging transactions discussed above.

17

18 **10.6 2010/11 Gas Year Capacity Management**

19 Section 10.2 provides a description of CM. This section outlines the CM revenues for the
20 2010/11 Gas Year.

21

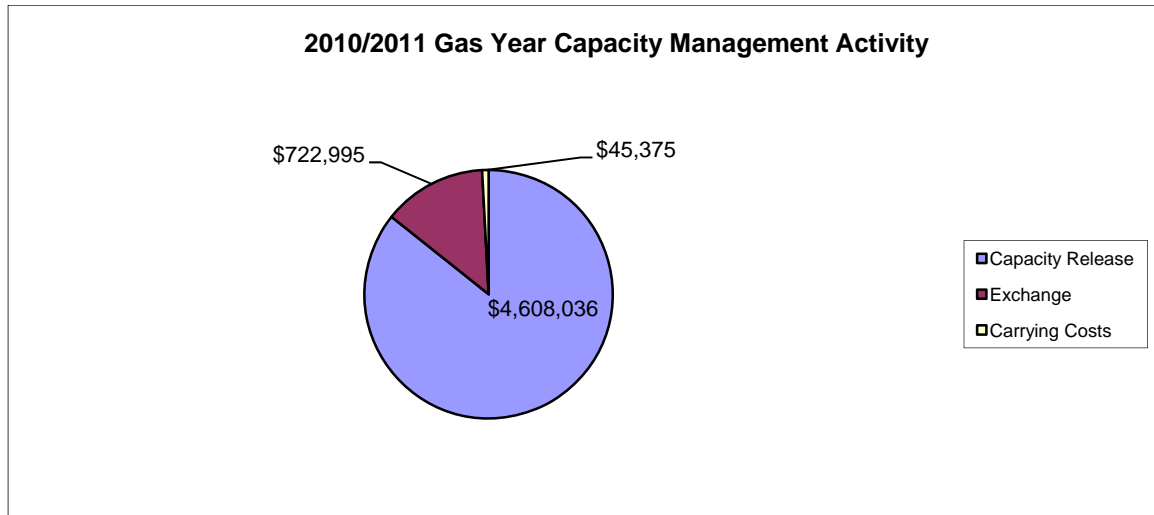
22

23

24

1 **10.6.1 2010/11 Gas Year Capacity Management Activities and Results**

2 Total CM revenues for the 2010/11 Gas Year (excluding carrying costs) were \$5.3
3 million. The specific component breakdown of these revenues by activity type is detailed
4 in the following chart.



5

6

7 Actual CM revenues, excluding carrying costs, were \$1.6 million less than the budget of
8 \$6.9 million as per the five-year average of actual results covering the period of
9 November 1, 2005 through October 31, 2010.

10

11 The 2010/11 Gas Year CM revenues, which netted to a credit of \$5.4 million after the
12 inclusion of carrying costs, were accumulated in a separate deferral account for internal
13 control purposes and were then closed out to the 2010/11 Gas Year Transportation
14 PGVA after the conclusion of the 2010/11 Gas Year period. The Transportation base
15 rates that came into effect on May 1, 2011 included an embedded amount of \$6.9 million
16 for CM revenues forecast for the 2010/11 Gas Year. 2010/11 Gas Year CM revenues

1 are detailed by individual transaction type in Schedule 10.6.1. Results by calendar
2 month during the 2010/11 Gas Year are shown in Schedule 10.6.2.

3

4 **10.6.2 2010/11 Gas Year Capacity Release**

5 Net capacity release revenues of \$4.6 million were realized in the 2010/11 Gas Year
6 (Schedule 10.6.1, line 4). The availability of markets downstream of Manitoba requiring
7 transportation made these transactions feasible.

8

9 **10.6.3 2010/11 Gas Year Exchanges**

10 2010/11 Gas Year CM exchanges generated \$0.7 million in net revenues (Schedule
11 10.6.1, line 8). A favourable basis differential between Manitoba and downstream
12 markets made these transactions feasible.

13

14 **10.7 Other Gas Cost Deferral Balances for 2010/11 Gas Year**

15 **10.7.1 2010/11 Gas Year Heating Value Margin Deferral Account**

16 The approved rates for the 2010/11 Gas Year were based on a gas heating value of
17 37.8 GJ/10³m³. As actual gas heating values for the 2010/11 Gas Year period averaged
18 lower than this embedded amount a balance of \$0.8 million owing to customers
19 accumulated through October 31, 2011. The addition of carrying costs for the months
20 from November 2011 through July 2013 results in the balance of \$0.8 million owing to
21 customers as displayed on line 37 of Schedule 10.7.1.

22

23

24

1 **10.7.2 April 30, 2011 Prior-Period Gas Deferrals Account**

2 The April 30, 2011 Prior-Period Gas Cost Deferrals Account is comprised of residual
3 balances from 2009/10 Gas Year deferral accounts and the April 30, 2010 Prior-Period
4 Gas Deferral account as detailed on lines 1 to 9 of Schedule 10.7.2(a).

5

6 Rate riders designed to recover the balance in the April 30, 2011 Prior-Period Gas Cost
7 Deferrals Account were approved in Order 66/11 for implementation on May 1, 2011.

8 Centra transferred the residual balance in the April 30, 2010 Prior-Period Gas Cost
9 Deferral Account, along with the final balances in the 2009/10 Gas Year PGVA's and
10 Heating Value Margin Deferral Account, to the April 30, 2011 Prior-Period Gas Cost
11 Deferral Account in order to bundle all approved prior-period gas cost deferrals into a
12 single account to track the recovery of the net deferral balance over the subsequent 12-
13 month period by way of rate riders implemented on May 1, 2011.

14

15 The cumulative actual April 30, 2011 net balance in these various deferral accounts
16 totalled \$4.6 million owing to Centra as identified on line 9 of Schedule 10.7.2(a). This
17 compares to the estimated balance for these accounts of \$4.5 million owing to Centra as
18 approved in Order 66/11. The individual approved and actual account balances, and
19 explanations of the differences between the approved and actual figures, are detailed on
20 lines 1 through 7 of Schedule 10.7.2(a).

21

22 Recovery of the balance in the April 30, 2011 Prior-Period Gas Cost Deferral Account
23 began on May 1, 2011 when rate riders approved in Order 66/11 came into effect. The
24 actual \$0.7 million residual debit balance in this account on April 30, 2012 as identified

1 on line 15 of Schedule 10.7.2(b) was due to warmer than normal weather for the
2 amortization period of May 2011 through April 2012, resulting in a net reduction to rate
3 rider collections from customers. The associated rate riders were removed effective May
4 1, 2012 as approved in Order 54/12. Centra intends to transfer the July 31, 2013
5 residual debit balance of \$0.8 million recoverable from customers including carrying
6 costs (Schedule 10.7.2(b), line 41), along with the residual balances in all other
7 previously discussed 2010/11 Gas Year non-Primary Gas cost deferral accounts to the
8 July 31, 2013 Prior-Period Gas Cost Deferral Account to facilitate the disposition of all
9 prior-period gas cost deferral balances with rate riders to become effective on August 1,
10 2013 for a subsequent twelve-month period.

11
12 **10.8 Description of 2011/12 Gas Year Costs and PGVAs**

13 On November 1, 2011, new non-Primary Gas PGVA and other gas cost deferral
14 accounts were created to accumulate gas cost deferral inflows and outflows during
15 Centra's 2011/12 Gas Year from November 1, 2011 to October 31, 2012.

16
17 The Primary Gas, Supplemental Gas, and Distribution PGVA balances for the months of
18 November 2011 through May 2012 have incorporated an actual UFG percentage of
19 0.52% of total receipts into the Centra system, based upon the 12-month UFG true-up
20 that was conducted in the summer of 2012.

21
22 Schedule 10.8.0 displays the 2011/12 Gas Year actual costs relative to the approved
23 forecast. Line 63 of Schedule 10.8.0 indicates actual costs for the 2011/12 Gas Year

1 total \$160.1 million in comparison to the forecast of \$248.0 million as approved through
2 PUB Order 66/11.

3

4 **10.8.1 2011/12 Gas Year Primary Gas PGVA**

5 As noted previously, details pertaining to the Primary Gas PGVA for the period from
6 November 1, 2011 to October 31, 2012 have been provided for information purposes
7 only. While Centra is requesting final approval of actual Primary Gas costs for the Gas
8 Year 2011/12, it is not seeking any change to Primary Gas rates in this Application as
9 Primary Gas rates are adjusted each quarter through Primary Gas rate applications
10 using the RSM approved by the PUB.

11

12 Schedule 10.8.1 sets out the monthly detail for the account. The total October 31, 2012
13 balance, including carrying costs, is \$25.4 million owing to customers as shown on line
14 25 of Schedule 10.8.1. The cost inflows and outflows are based on actual results to
15 October 31, 2012. As discussed in section 10.4.1, no variance analysis of the Primary
16 Gas PGVA is provided within this Application.

17

18 **10.8.2 2011/12 Gas Year Supplemental PGVA**

19 Schedule 10.8.2(a) sets out the monthly detail for the account. The cost inflows and
20 outflows are based on actual results from November 1, 2011 to October 31, 2012. The
21 October 31, 2012 balance is \$0.7 million owing to customers (line 23).

22

23 Schedule 10.8.2(b) shows a comparison of actual and approved Supplemental Gas
24 PGVA inflows and outflows, which helps to identify the major contributors to the residual

1 balance. Supplemental cost inflows, net of UFG costs transferred to the Distribution
2 PGVA, were \$32.9 million less than approved costs (line 12).

3

4 Line 2 of Schedule 10.8.2(b) provides a comparison of actual and approved Oklahoma
5 supply costs. Inflows were \$1.9 million less than forecast, where \$1.8 million of the total
6 variance is attributable to purchases that were 464,000 GJs less than forecast due to
7 warmer than normal weather during the 2011/12 Gas Year. The remaining \$0.1 million
8 variance pertains to approved forecast prices that utilized a November 1, 2010 futures
9 price strip as compared to actual average index prices for supplies that were lower than
10 forecast.

11

12 Referring to line 3 of Schedule 10.8.2(b), Supplemental Gas storage utilization was \$0.2
13 million less than forecast. Actual weather during the November 2011 through March
14 2012 period was 20% warmer than normal (based on effective heating degree days),
15 thus eliminating the requirement to withdraw any Supplemental Gas supplies from
16 storage.

17

18 Line 5 of Schedule 10.8.2(b) shows a \$31.9 million variance related to Supplemental
19 Gas Peaking Delivered Service. 9.9 million GJ's of Supplemental Gas Peaking Delivered
20 Service purchases were forecast for the 2010/11 Gas Year. By comparison, actual
21 purchases for the 2011/12 Gas Year totalled 843,968 GJ's. The lower Supplemental Gas
22 Peaking Delivered Service purchase volumes resulted in Supplemental inflows that were
23 \$31.1 million less than the approved forecast. In addition, the remaining \$0.8 million

1 variance relates to lower than forecast average per unit commodity costs for these
2 supply purchases.

3

4 Lines 6 of Schedule 10.8.2(b) displays the \$0.5 million of Alternate Supply Service
5 acquired for Interruptible customers in lieu of curtailment in the months of April and
6 October 2012. In the 2011/12 Gas Year, 181,032 GJ's of Alternate Supply Service
7 purchases were required. Forecast Interruptible consumption over and above pre-
8 contracted supplies is considered to be curtailed and therefore, Alternate Supply Service
9 is not included in the forecast.

10

11 Line 10 of Schedule 10.8.2(b) compares the forecast versus actual Supplemental UFG
12 component transferred to the Distribution PGVA. Supplemental Gas UFG transfers were
13 \$0.5 million below forecast due to actual Supplemental Gas purchase volumes being 9.4
14 million GJ's less than approved, along with an additional small component due to the
15 lower than forecast natural gas commodity prices as noted in Schedule 10.8.2(b), lines
16 23 and 24.

17

18 Line 11 of Schedule 10.8.2(b) presents the transfer of Supplemental Gas cost inflows
19 pertaining to the UFG True-up, where \$0.02 million were reallocated from the
20 Distribution PGVA as the actual UFG percentage of 0.52 % for the months of June 2011
21 through May 2012 was less than the 0.90% forecast.

22

23 Total Supplemental Gas PGVA Inflows, as indicated on Schedule 10.8.2(b) line 12, were
24 \$32.9 million less than the 2010/11 Gas Year approved forecast.

1 Schedule 10.8.2(b), line 15, compares actual versus forecast Supplemental Gas PGVA
2 WACOG outflows that were \$32.8 million less than forecast, which is mainly attributable
3 to the previously discussed warmer than normal 2011/12 winter weather and
4 correspondingly lower customer consumption.

5

6 Line 16 of schedule 10.8.2 (b) identifies the corresponding WACOG outflow related to
7 Alternate Supply Service volumes delivered to Interruptible customers in lieu of
8 curtailment in April and October 2012. Costs incurred relating to Alternate Supply
9 Service are recovered from customers electing to take the service and therefore, line 16
10 and line 6 of Schedule 10.8.2(b) correspond directly to one another. As Alternate Supply
11 Service is not forecast, WACOG outflows are \$0.5 million greater than forecast as a
12 result.

13

14 Total Supplemental Gas PGVA outflows, as indicated on Schedule 10.8.2(b) line 17,
15 were \$32.3 million less than forecast.

16

17 The 2011/12 Gas Year Supplemental PGVA cost inflows and outflows are based on
18 actual results for the period from November 1, 2011 to October 31, 2012. The actual
19 Supplemental Gas PGVA balance at October 31, 2012, as indicated on line 23 of
20 Schedule 10.8.2(a), is \$0.7 million owing to customers. The addition of carrying costs for
21 the months from November 2012 through July 2013 results in the balance of \$0.7 million
22 owing to customers displayed on line 39 of Schedule 10.8.2(a).

23

24

1 **10.8.3 2011/12 Gas Year Transportation PGVA**

2 Schedule 10.8.3(a) sets out the monthly detail for the 2011/12 Gas Year Transportation
3 PGVA. The total October 31, 2012 balance is \$5.6 million owing to Centra as shown on
4 line 21. The 2011/12 Gas Year Transportation PGVA cost inflows and outflows are
5 based on actual results for the period of November 1, 2011 to October 31, 2012.

6

7 Schedule 10.8.3(b) shows a comparison of 2011/12 actual versus 2010/11 approved
8 Transportation PGVA cost inflows and outflows.

9

10 Total fixed transportation cost inflows (Line 2 of Schedule 10.8.3(b)) were \$6.4 million
11 less than forecast. This variance is a result of continued de-contracting of firm
12 transportation capacity on the TransCanada Mainline relative to the 2010/11 approved
13 forecast. In months where Centra was able to utilize Primary Gas Delivered Service (see
14 Schedule 10.8.1 line 3) and achieve a lower overall net landed cost of gas compared to
15 incurring fixed contract demand charges with TransCanada, Centra reduced its fixed
16 pipeline demand charges by a total of \$8.9 million as compared to the 2010/11 Gas Year
17 budget. Throughout the 2011/12 Gas Year Centra faced higher TCPL Demand Tolls,
18 increasing fixed costs as compared to budget by \$2.6 million. Slightly favourable US
19 exchange rate variances for the 2011/12 Gas Year reduced fixed transportation costs by
20 \$0.1 million relative to forecast. For the 2010/11 Gas Year, the exchange rate was
21 forecast at an average of \$1.01 CDN/USD in comparison to the actual average
22 exchange rate of \$1.00 CDN/USD.

23

1 Line 3 of Schedule 10.8.3(b) indicates that variable transportation cost inflows were
2 \$0.04 million less than approved. The main contributor to this variance was reduced
3 TCPL variable charges as a result of replacing Firm Mainline transportation with Primary
4 Gas Delivered Service.

5

6 Lines 4 and 5 of Schedule 10.8.3(b) denote the variances associated with imputed
7 transportation costs on both Primary Gas Delivered Service and Supplemental Gas
8 Peaking Delivered Services. These matters were discussed previously in Sections
9 10.4.2 and 10.4.3. As Centra continues to mitigate its exposure to increasing tolls on the
10 TCPL Mainline, Primary Gas Delivered Service and Supplemental Gas Peaking
11 Delivered Services have played an increasing role in Centra's commodity purchases.

12

13 Line 4 of Schedule 10.8.3(b) pertains to Supplemental Gas Peaking Delivered Service
14 Imputed Transportation Costs that were \$4.1 million lower than the 2010/11 approved
15 forecast. There were no Supplemental Gas Peaking Delivered Service purchases during
16 the 2011/12 Gas Year due to the previously noted much warmer than normal weather.

17

18 Primary Gas Delivered Service Imputed Transportation Costs were \$10.7 million greater
19 than the 2010/11 Gas Year approved budget figures (line 5 of Schedule 10.8.3(b)).
20 Centra continued to actively manage its portfolio during the 2011/12 Gas Year in order to
21 further mitigate its exposure to increasing tolls on the TCPL Mainline.

22

23 Schedule 10.8.3(b), line 6, Storage Gas Transportation and Delivery Costs were \$0.8
24 million less than approved. Actual weather in the November through March 2012 period

1 was warmer than normal, therefore requiring fewer withdrawals from Centra's storage to
2 meet the winter load.

3

4 Line 8 of Schedule 10.8.3(b) indicates that actual 2011/12 Gas Year CM revenues were
5 less than the approved 2010/11 Gas Year forecast by \$0.5 million. CM revenues are
6 discussed in detail in Section 10.9 below.

7

8 In summary, actual inflows to the 2011/12 Gas Year Transportation PGVA were \$0.05
9 million less than the approved 2010/11 Gas Year forecast as identified on Schedule
10 10.8.3(b), line 10.

11

12 Line 13 of Schedule 10.8.3(b) indicates that WACOG outflows from the Transportation
13 PGVA were \$5.7 million less than approved as a result of actual throughput volumes
14 being lower than forecast due to warmer than normal weather experienced during the
15 2011/12 Gas Year.

16

17 The net accumulation in the 2011/12 Gas Year Transportation PGVA is a balance of
18 \$5.6 million owing to Centra as of October 31, 2012 as shown on Schedule 10.8.3(a),
19 line 21. The addition of carrying costs for the months from November 2012 through July
20 2013 results in the balance of \$5.7 million owing to Centra as shown on line 34 of
21 Schedule 10.8.3(a).

22

23

24

1 **10.8.4 2011/12 Gas Year Distribution PGVA**

2 Schedule 10.8.4(a) sets out the monthly detail for the account. The Distribution PGVA
3 balance as at October 31, 2012, equates to \$1.7 million owing to customers (line 16).

4 Schedule 10.8.4(b) provides a comparison of actual and approved annual cost inflows
5 and outflows for the account. UFG cost inflows into this account from the Primary Gas
6 and Supplemental Gas PGVA's were \$ 2.0 million less than forecast.

7

8 \$1.2 million of this variance (line 3) is attributable to reduced volume throughput as a
9 result of warmer than normal weather experienced in the 2011/12 Gas Year. Total
10 volume purchases excluding broker delivered Primary Gas were 7.1 million GJ less than
11 approved forecast volumes as shown on Schedule 10.8.0, line 72.

12

13 The remaining \$0.8 million of the 2011/12 Gas Year Distribution PGVA inflow variance is
14 the result of the UFG true-up calculated in June 2012 for the period from June 1, 2011 to
15 May 31, 2012. \$0.8 million was transferred from the Distribution PGVA to the Primary
16 Gas and Supplemental Gas PGVA's, as shown on line 4 of Schedule 10.8.4(b), due to
17 the lower than forecast UFG experienced during the period. The actual UFG percentage
18 of 0.52% for the months of June 2011 through May 2012 was less than the forecast of
19 0.90%.

20

21 WACOG outflows from the Distribution PGVA were \$0.3 million lower than the approved
22 forecast (Schedule 10.8.4(b), line 10) mainly as a result of the warmer than normal
23 weather experienced in the 2011/12 Gas Year.

24

1 The 2011/12 Gas Year Distribution PGVA's net residual balance of \$1.7 million owing to
2 customers at October 31, 2012 is shown on line 16 of Schedule 10.8.4(a). The addition
3 of carrying costs for the months from November 2012 through July 2013 results in the
4 balance of \$1.7 million owing to customers as displayed on line 33 of Schedule
5 10.6.4(a).

6

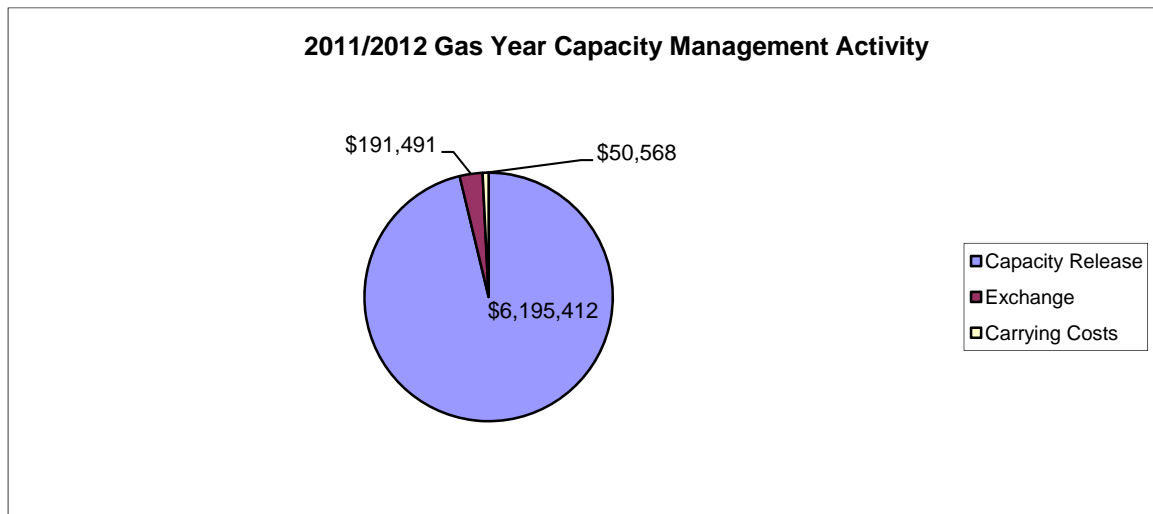
7 **10.9 2011/12 Gas Year Capacity Management**

8 Centra undertook CM activities throughout the 2011/12 Gas Year in the same manner as
9 described in section 10.6 of this Application.

10

11 **10.9.1 2011/12 Gas Year Capacity Management Activities and Results**

12 Total CM revenues for the 2011/12 Gas Year (excluding carrying costs) were \$6.4
13 million. The specific component breakdown of these revenues by activity type is detailed
14 in the following chart.



15

16

1 Actual CM revenues, excluding carrying costs, were \$0.5 million less than the 2010/11
2 Gas Year approved amount of \$6.9 million. The 2011/12 Gas Year CM revenues, which
3 netted to \$6.4 million including carrying costs, were accumulated in a separate deferral
4 account for internal control purposes and were then closed out to the 2011/12 Gas Year
5 Transportation PGVA after the conclusion of the 2011/12 Gas Year. 2011/12 Gas Year
6 CM revenues are detailed by individual transaction type in Schedule 10.9.1. Results by
7 calendar month during the 2011/12 Gas Year are shown in Schedule 10.9.2.

8

9 **10.9.2 2011/12 Gas Year Capacity Release**

10 Net capacity release revenues of \$6.2 million were realized in the 2011/12 Gas Year
11 (Schedule 10.9.1, line 4). The availability of markets downstream of Manitoba requiring
12 transportation made these transactions feasible.

13

14 **10.9.3 2011/12 Gas Year Exchanges**

15 2011/12 Gas Year Capacity Management exchanges generated \$0.2 million in net
16 revenues (Schedule 10.9.1, line 8). A favourable basis differential between Manitoba
17 and downstream markets made these transactions feasible.

18

19 **10.10 Other Gas Cost Deferral Balances for 2011/12 Gas Year**

20 **10.10.1 2011/12 Gas Year Heating Value Margin Deferral Account**

21 Approved rates are based on a gas heating value of 37.8 GJ/10³m³ and as actual gas
22 heating values for the 2011/12 Gas Year period averaged lower than this embedded
23 amount, a balance of \$0.5 million owing to customers accumulated through October 31,
24 2012 as displayed on line 11 of Schedule 10.10.1. The addition of carrying costs for the

1 months from November 2012 through July 2013 results in a balance of \$0.5 million
2 owing to customers as displayed on line 28 of Schedule 10.10.1.

3

4 **10.11 Summary of All Prior-Period Gas Cost Deferral Balances to July 31, 2013**

5 Schedule 10.11.0 provides a summary of all gas cost deferral balances to July 31,
6 2013. The total of all prior-period deferral balances equates to \$0.01 million owing to
7 Centra as at July 31, 2013, as indicated on line 24 of Schedule 10.11.0. Centra is
8 requesting the approval of the associated rate riders to recover this amount from
9 customers over the 12-month period beginning August 1, 2013.

10

11 The allocation of the July 31, 2013 Prior-Period Gas Cost Deferral Account to the
12 various customer classes and the calculation of rate riders to recover this balance in
13 rates, as well as the resulting rate impacts by customer class will be provided in the Cost
14 Allocation & Rate Design material in Tab 11 and the Rate Schedules and Customer
15 Impacts shown in Tab 12 of this Application.

16

17 **10.12 Description of Forecast 2012/13 Gas Year Costs**

18 This section provides a discussion and estimate of gas costs for the forecast period of
19 November 1, 2012 to October 31, 2013. The forecast gas cost information contained in
20 this Section is used in preparing the new base rates for Centra's Supplemental Gas,
21 Transportation (to Centra) and the UFG component of Distribution rates to be effective
22 August 1, 2013.

23

1 The gas cost forecast in this Application incorporates settled market index prices for
2 November 2012, with all other months based on futures market prices as of the
3 November 1, 2012 market close. Pipeline tolls are based on the 2012 toll levels carried
4 forward for the entire Gas Year. Consumption volumes and customer numbers from
5 November 1, 2012 to October 31, 2013 are based on Centra's most recent normal
6 weather customer and volume forecast as provided in Tab 8.

7

8 The gas cost estimate considers forecast purchase volumes based on Centra's
9 projection of Sales Service (Centra supply and Marketer supply under WTS) and
10 Transportation Service volumes. Total purchase volumes were developed from the
11 estimate of normal sales volumes considering UFG amounts equal to 0.9% of total
12 system receipts. This UFG factor represents long-term historical data and is reflective of
13 typical UFG losses.

14

15 Natural gas market prices continue to remain at or near decade lows in response to the
16 growth in production of unconventional gas supplies, including prolific shale gas plays in
17 multiple U.S. jurisdictions, as well as significant technological advances achieved by the
18 exploration and production industry in general.

19

20 **10.12.1 Primary Gas Supply**

21 Western Canadian supply costs for Primary Gas for the forecast period from November
22 1, 2012 to October 31, 2013 are based on the terms of Centra's current Primary Gas
23 supply contract, which became effective on November 1, 2012. Monthly Primary Gas
24 supply prices direct to the load are forecast to range between \$2.96/GJ and \$3.35/GJ for

1 the period of November 1, 2012 to October 31, 2013 as provided on Schedule 10.12.1
2 line 43.

3

4 **10.12.2 Primary Gas Swing Load Purchases**

5 Pricing for Primary Gas Swing Load purchases reflect the terms for Swing Load service
6 under Centra's current Primary Gas supply contract. The Swing Load gas pricing is
7 indexed to daily AECO spot prices for Swing Load volumes purchased on any given day.

8

9 **10.12.3 Oklahoma Supply**

10 Oklahoma supply prices incorporate settled November 2012 index pricing, plus
11 November 1, 2012 futures market prices for December 1, 2012 to March 31, 2013.
12 Oklahoma supply prices for deliveries directly to the Manitoba load for the period from
13 November 1, 2012 to March 31, 2013 are forecast to range between \$3.10/GJ and
14 \$3.44/GJ as provided on Schedule 10.12.1 line 45. Centra's Oklahoma ANR
15 transportation contract concludes as of March 31, 2013.

16

17 **10.12.4 Emerson Supply**

18 Emerson supply prices are based on settled index pricing for the month of November
19 2012 and November 1, 2012 futures strip prices for the period from December 1, 2012
20 through October 31, 2013. Emerson supply prices for deliveries either to the Manitoba
21 load or for storage injection for the period from November 1, 2012 to October 31, 2013
22 are forecast to range from \$3.53/GJ to \$3.88/GJ as provided on Schedule 10.12.1 line
23 48.

24

1 **10.12.5 Chicago Supply**

2 The new Gas Portfolio includes a new ANR storage transportation contract that allows
3 Centra to move gas from the ANR Joliet delivery point to the ANR storage injection
4 point. Given their close physical proximity to one another, forecast prices for ANR Joliet
5 purchases use Chicago market hub futures prices as a proxy in the absence of an
6 exchange traded ANR Joliet futures contract. Chicago futures market prices as at
7 November 1, 2012 for the storage injection period from April 1, 2013 to October 31, 2013
8 are forecast to range from \$3.63/GJ to \$3.78/GJ as provided on Schedule 10.12.1 line
9 49.

10

11 **10.12.6 Uncontracted Supplies**

12 Under normal weather conditions, approximately 35,319 GJ of uncontracted supply is
13 forecast to be required to meet the Interruptible load during the 2012/13 Gas Year. This
14 supply requirement is excess to that available to serve the system load by means of
15 TCPL operating demand levels, Oklahoma supplies, Emerson supplies, and storage
16 withdrawal capabilities. These volumes represent the amount of curtailment that is
17 forecast, on a normal weather basis, for Interruptible customers. As such, these
18 curtailment volumes have been excluded from the 2012/13 gas cost forecast.
19 Uncontracted supplies are purchased on a day-to-day basis as required, typically as a
20 Delivered Service, and those costs are directly recovered from those Interruptible
21 customers that elect Alternate Supply Service.

22

23

24

1 **10.12.7 Storage Withdrawals**

2 Based on the actual balances in each of the gas storage accounts after the 2011/12
3 winter season, plus the actual fill costs during the summer of 2012, the final average
4 inventory cost for each component as at October 31, 2012 is as follows:

5

Primary Gas Supply in storage:	\$2.813 CAD/GJ
Supplemental Gas Supply in storage:	\$4.703 CAD/GJ
Transportation costs inventoried:	\$0.1681 CAD/GJ

6

7 The cost of the forecast storage withdrawals for the 2012/13 winter season is
8 determined using these average inventory costs.

9

10 **10.12.8 Transportation and Storage Costs**

11 TCPL transportation costs for the entire 2012/13 Gas Year forecast period of November
12 1, 2012 to October 31, 2013 are based on the TCPL approved interim tolls that came
13 into effect on January 1, 2012 and are provided in Schedule 10.12.1.

14

15 U.S. storage and pipeline tolls for ANR Pipeline and GLGT are based on current tolls
16 and contracting levels for the November 1, 2012 through March 31, 2013 period. The
17 tolls and costs associated with Centra's new seven-year U.S. transportation and storage
18 portfolio have been incorporated into the 2012/13 Gas Year forecast for the period of
19 April 1, 2013 through October 31, 2013.

20

21

22

1 **10.12.9 U.S. Exchange Rate**

2 For November 2012, the exchange rate applied to U.S. gas purchases and U.S.
3 transportation and storage costs is the actual exchange rate of \$0.99 CAD/USD. A
4 forecast exchange rate of \$1.00 CAD/USD is utilized for the December 1, 2012 to March
5 31, 2013 period, while an exchange rate of \$0.99 CAD/USD has been forecast for the
6 period of April 1, 2013 through October 31, 2013.

7

8 **10.12.10 Resulting Gas Costs for 2012/13 Gas Year**

9 The total cost of gas forecast for the Gas Year from November 1, 2012 to October 31,
10 2013 is \$204.2 million including forecast CM revenues of \$6.3 million (discussed in
11 Section 10.12.12 below). The details of these calculations are shown in Schedules
12 10.12.1 through 10.12.3 (a) and (b).

13

14 Schedule 10.12.1 summarizes the fixed and variable transportation unit costs, unit
15 supply prices and fuel ratios. Schedule 10.12.2 summarizes contract demand levels and
16 volumes by supply type supplied to the Manitoba load. Schedules 10.12.3(a) and (b)
17 summarize total gas costs grouped into fixed costs, variable transportation costs, supply
18 costs and other costs.

19

20 **10.12.11 2012/13 Forecast Gas Year Capacity Management**

21 The forecast of CM revenues equates to \$6.3 million for the 2012/13 Gas Year. This
22 amount is based on the most recent 60-month rolling average of Centra's actual CM
23 results. The rolling 60-month calculation uses actual CM results from November 1, 2007

- 1 to October 31, 2012. By comparison, the approved 2010/11 Gas Year cost forecast
- 2 incorporated forecast CM revenues of \$6.9 million.