

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO  
ENVIRONMENTAL DEFENCE INTERROGATORY #34

INTERROGATORY

Interrogatory No. A.1-ED-34 Reference: Ex. A, Tab 3, Schedule 1, Page 5 & 6

The second purpose for the project is described at pages 5 and 6 of Exhibit A, Tab 3, Schedule 1, and is summarized as follows at page 2:

“4. The GTA Project will: ...

b. Reduce operational risks and enhance safety and reliability by:

i. Improving diversity and flexibility of the distribution system through additional looping of single feed XHP lines and providing additional supply sources for the major XHP lines in the GTA Project Influence Area; and

ii. Providing the ability to lower pressures on key supply lines;”

- a) Please identify and describe all minimum system standards relating to operational risks, safety, and reliability that Enbridge will fail to meet if this project is not built.
- b) If customer growth requirements could be completely met through DSM alternatives, would the project be necessary to meet minimum system standards relating to operational risks, safety, and reliability? Please explain your answer and identify and describe any such minimum system standards.
- c) If customer growth requirements could be completely met through DSM alternatives, could certain portions of the project be avoided or deferred while still meeting minimum system standards relating to operational risks, safety, and reliability? Please explain and justify your answer.

RESPONSE

- (a) Enbridge operates all of its pipelines facilities to meet or exceed minimum codes, regulations, and standards. There are no minimum standards relating to operational risk, safety and reliability that will not be met if this project does not proceed.

Witnesses: C. Fernandes  
N. Thalassinos

- (b) The Company does not believe that load growth can be met through efficiency gains, please refer to Environmental Defense Interrogatory #20 at Exhibit I.A4.EGD.ED.20. The project is not justified based on meeting minimum safety standards. The project addresses many needs as identified in Exhibit A, Tab 3, Schedule 1, Paragraph 4 of the pre-filed evidence. With regards to operational risk and safety specifically, the TSSA recently released the Oil and Gas Pipeline Systems Code Adoption Document Amendment FS-196-12 which directs companies such as Enbridge to implement risk reduction activities for higher risk assets. This project is consistent with the directives of the Code Adoption Document.
- (c) The Company does not believe that load growth can be met through efficiency gains, please refer to Environmental Defense Interrogatory #20 at Exhibit I.A4.EGD.ED.20. In order to meet all of project objectives, there are no sections of this project that could be deferred. The justification for the project is multi-faceted as explained in Exhibit A, Tab 3, Schedule 1, Paragraph 4 of the pre-filed evidence. The project in it's entirety is required to achieve these objectives.