

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO
ENVIRONMENTAL DEFENCE INTERROGATORY #35

INTERROGATORY

Interrogatory No. A.1-ED-35 Reference: Ex. A, Tab 3, Schedule 1, Page 6-8

The third purpose for the project is described at pages 6 to 8 of Exhibit A, Tab 3, Schedule 1, and is summarized as follows at page 2:

“4. The GTA Project will: ...

c. Provide entry point diversity by reducing the dependence upon Parkway Gate Station which currently provides more than 50% of the supply to the GTA Project Influence Area and does not have alternate means of supply.”

- a) The Parkway Gate Station currently provides approximately 58% of the supply to the GTA. Is this degree of reliance on a single gate station contrary to certain minimum system standards? If yes, please identify and discuss those standards.
- b) Please list all municipalities in (i) Ontario and (ii) Canada with a population of 250,000 and over that receive over 50% of its supply from a single gate station.
- c) If Union Gas builds its proposed loss of critical unit (LCU) compressor and Enbridge builds its proposed connection between the proposed Parkway West Gate Station and Enbridge’s Parkway North pipeline, to what degree would this mitigate the risk of customer losses resulting from an outage at the Parkway Gate Station?

RESPONSE

- a) Enbridge is not aware of any minimum standards with respect to reliance on a single gate station specifically.

Witnesses: C. Fernandes
E. Naczynski

- b) Enbridge does not track reliance on gate stations outside of its franchise territory. Enbridge notes that the GTA Project Influence Area has almost one million customers and population that is significantly larger than one million. The number of customers connected to a single integrated gas distribution network is relevant, given the restoration process and timelines associated with outages.

Ottawa also has more than 50% of its demand served through a single gate station.

- c) As per Exhibit A, Tab 3, Schedule 6, paragraph 38, the construction of the proposed Parkway West Gate station and associated facilities would allow for a complete shutdown of the existing Parkway Gate Station while still maintaining supply to the distribution system.