

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO
GREEN ENERGY COALITION INTERROGATORY #7

INTERROGATORY

Issue A.1.Need, Ref: Exh. A, T3, S3, pp. 12-13, ¶23.

- a) Please explain how the various elements of the proposed GTA Project would reduce the risk of curtailed deliveries to PEC or of customer outages in Toronto in the event that the Don Valley Pipeline “experienced a pipeline defect or damage in winter months.”
- b) Please provide any information available to Enbridge regarding the ability of PEC to operate on an alternative fuel during gas curtailments.
- c) If PEC cannot currently fully operate on an alternative fuel during gas curtailments, please provide any information available to Enbridge regarding the feasibility and cost of modifying PEC to operate on an alternative fuel.
- d) Please explain whether Enbridge has approached PEC regarding its willingness to operate under an interruptible delivery tariff. If so, please provide all correspondence and other documents related to such discussions. If not, please explain why Enbridge has not explored this option for reducing load on Station B under design-condition loads and following operating contingencies.

RESPONSE

- a) If the Don Valley line experienced a damage or pipeline defect in the winter months, the immediate response would be to lower the pressure in the line to below 30% SMYS to mitigate the probability of a failure due to the damage or defect. The lower pressure would impact the capacity available absent other facilities. With the proposed facilities in place, supply could be fed from the west (Segment A) and through Segment B to support the Don Valley line at the proposed Buttonville and Jonesville stations. The two new sources of supply along the Don Valley line (Buttonville and Jonesville) allow for the line to be operated at a lower pressure while still maintaining reliable delivery to customers.

Witness: C. Fernandes

- b) Enbridge does not have any information regarding the ability of PEC to operate on alternate fuels.
- c) Enbridge does not have any information on the feasibility of PEC converting to alternate fuels. Enbridge believes that the feasibility would be determined by, among other things, PEC's contractual obligations, facilities design and ability to obtain permits for fuel storage and operation.
- d) Enbridge has not approached PEC regarding an interruptible delivery tariff and has no plans to do so. The current contractual term is for firm service as per the Gas Delivery Agreement in EB-2006-0305.