

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO
GREEN ENERGY COALITION INTERROGATORY #8

INTERROGATORY

Enbridge, Issue A.1.Need, Ref: Exh. A, T3, S3, pp. 17-18, 32.

- a) Please explain what type of capacity is being referred to in the statement regarding “unavailable capacity to reduce these lines to below 30% SMYS.”
- b) Please explain which two options are being referred to with regard to the statement that “the choice between these two options is not considered to be reasonable.”
- c) Are the SMYS values provided in Table 3 the current (i.e. 2013) values?
If not, for what year did they apply?
- d) For how many years have the SMYS values been above 30% for each of the first three pipelines listed in Table 3:
 - i. NPS 26
 - ii. NPS 30 Don Valley
 - iii. NPS 36 Parkway
- e) Please provide the SMYS values for each of the four pipelines listed in Table 3 for each year since 1992.
- f) Has the Company evaluated whether additional load reductions through DSM programs would allow for reductions in operating pressure on the NPS 26 and NPS 30 Don Valley pipelines? If so, please provide all internal memoranda, reports, or other documentation of such evaluations.

RESPONSE

- a) The overall system does not have the capacity to meet firm commitments if these lines operate at pressures that would be below 30% SMYS.
- b) The reference is to the choice between lowering the pressure in the line and meeting firm delivery commitments.

Witness: N. Thalassinos
C. Fernandes

- c) Yes they are the current values. Note that the % SMYS for the NPS 26 and Don Valley lines are based on the set point pressure (as explained in the responses to FRPO-35a and FRPO-11a at Exhibits I.A5.EGD.FRPO.35 and Exhibit I.A1.EGD\FRPO.11, respectively) not the MOP.
- d) The % SMYS is typically referred to in relation to the MOP. On that basis, the NPS 26, NPS 30 Don Valley, and NPS 36 Parkway lines have always operated over 30% SMYS.
- e) The % SMYS values since 1992 have been as referenced in Exhibit A, Tab 3, Schedule 3, paragraph 18, Table 3 of the pre-filed evidence with the exception of the NPS 26. The pressure in the NPS 26 was lowered in 2005 due to a change in the Class Location of the pipeline from Class 3 to Class 4. This resulted in a reduction in % SMYS from 49.6% to 39.8% (based on new MOP of 400 psi).
- f) The Company does not believe this is feasible. Please see the response to Environmental Defense IR#2 at I.A4.EGD.ED.20.

Witness: N. Thalassinos
C. Fernandes