

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO  
ASSOCIATION OF POWER PRODUCERS OF ONTARIO INTERROGATORY #2

INTERROGATORY

Reference: EB-2012-0451 Exhibit A Tab 3 Schedule 1 Purpose Need & Timing

Preamble: In paragraph 8, Enbridge indicates that the GTA Reinforcement Project is required to maintain adequate inlet pressures to Station B to supply the Portlands Energy Centre (PEC).

- a) Please confirm that PEC is not changing its contractual volumes or other contract parameters which trigger the development of the proposed facilities (i.e. Segment A and Segment B).
- b) Please confirm that the pipeline facilities that are required to serve PEC were approved and constructed pursuant to EB-2006-0305 and further that the required capital contribution in aid of construction under EBO 188 has been collected from PEC.
- c) Please confirm that as noted in the Board's decision, the facilities added by Enbridge pursuant to EB-2006-0305 "meets the contractual demands of Portlands and maintains the operational characteristics of the distribution system".
- d) Paragraph 18 indicates that a supply disruption at Parkway would result in losses greater than 270,000 customers including PEC.
  - i. Please provide the nature of the disruption that is anticipated (time of year, volume of supply losses, duration of outage, etc.) that would result in the customer losses anticipated.
  - ii. What volume of gas is consumed by the 270,000 customers on a peak day?
  - iii. Please confirm that PEC is fed via Victoria Square Gate station and not Parkway.
  - iv. Assuming that PEC continues to deliver the required supply at Victoria Square, please explain how a curtailment in Enbridge's receipts at Parkway results in a pressure loss in the Don Valley line.
  - v. Assuming that PEC can still accommodate the prevailing system pressure under these circumstances, please confirm that PEC could

Witness: E. Naczynski

continue to consume a volume of gas up to its contract quantity provided that it delivers its gas supply.

## RESPONSE

- a) Confirmed.
- b) Confirmed.
- c) Confirmed.
- d)
  - i) The nature of the outage at Parkway Gate Station referred to was nonspecific, but assumed the loss of all flows through the station at a 35 DDC. The estimated supply disruption is 700 TJ/d. Enbridge estimated that the system would start to experience customer outages within 1 hour with a complete loss of system in approximately 6 hours. Given the time to make safe and relight customers, the outage duration would be measured in weeks if not months.
  - ii) The volume of gas being consumed by the 270,000 customers on a peak day is approximately 600 TJ/d.
  - iii) PEC receives their contractual supply of gas at Victoria Square.
  - iv) Enbridge operates an integrated network. With the loss of supply at Parkway, the supply flows are redirected to Lisgar and Victoria Square stations. These stations are interconnected via the XHP grid. As the flow increases from these stations to compensate, the associated pressure drops increase and results in lower pressures on the Don Valley line at Station B. With no flow on the MSL, the customer loss is concentrated around the MSL pipeline and extends into the downtown core of Toronto. Within a couple of hours not only will insufficient pressure be available to supply PEC, but insufficient pressures will be experienced across the XHP, HP and IP systems of the affected area. Please see response to

Environmental Defence Interrogatory #22 at Exhibit I.A4.ED.22 for additional information.

- v) If PEC could accommodate the prevailing system pressures, and could secure a firm supply given the circumstances, they could continue to consume.