

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO  
BOMA INTERROGATORY #11

INTERROGATORY

Issue: A.1

Schedule 3, 12, Page 21, Paragraph 25

- (a) Please confirm that "integrity activities" outlined in the first sentence would be either done at off-peak times, or would not require taking the pipeline out of use, wholly or partially.
- (b) Please discuss fully, to what extent planned maintenance and integrity activities are done outside the April to November period. Please quantify the maintenance activity for each of the last five years, as a percentage of total maintenance activity, which were undertaken during other than from April to November. Under that circumstances would it be necessary to conduct planned maintenance and integrity operations, in the November to March period, and which activities would need to be provided? Please discuss fully.
- (c) Please confirm under what circumstances welding repairs and connections can be done without taking the lines out of service. Please discuss in detail the volumes of welding activity that is done without taking the line out of service, and how much (for each of last five years) was done only after the line was taken out of service. If it is necessary to shut down the line, confirm that the work would be done during the April to November period. Provide details of any welding operation over the last five years that required the line to be taken out of service during the winter season.
- (d) Confirm that "planned events" take place outside of peak conditions. Please explain fully.

RESPONSE

- (a) Enbridge cannot confirm that the integrity activities would be done during off peak times. Certain operations may require taking the pipeline out of use, wholly or partially.

Witness: C. Moore

- (b) For the network of XHP pipelines in the GTA influence area, planned maintenance activities are generally proposed for the periods April to November. Planned work such as excavations, replacements, or repairs as a result of integrity evaluations, may necessarily be pushed into the December to March timeframe due to issues such as inclement weather, specific permit conditions, or availability of materials and equipment.
- (c) Welding repairs on XHP pipelines containing gas must be carried out under conditions that are safe to perform the work. This may require the pipeline to be depressurized to a lower stress level, or may require the flow in the pipeline to be reduced to decrease the cooling effect of the gas flow on the pipeline. Repairs to the XHP network are not a frequent occurrence. There have been events of welding repairs that required pressure reductions over the past five years. In 2012, an NPS 36 ball valve on the XHP system seized in a partially open position and had to be removed and replaced. The line was taken out of service and purged of gas to perform this work. In 2008, a crack on an NPS 30 XHP line, adjacent to a welded takeoff, was discovered as the result of leak survey patrol and required depressurization of the line and repair. Unplanned welding repairs resulting from a third party excavation damage or a corrosion or leak event may be required at any time of the year.
- (d) Planned events such as temporary or permanent relocations of XHP pipelines requested by municipalities under franchise agreements are generally planned for the April to November time period. However, planned work may need to occur in the December to March timeframe to satisfy the timelines for such relocations or replacements. As mentioned in (b) above, the planned events may unexpectedly be delayed and pushed into the November to March timeframe due to issues such as inclement weather, specific permit conditions, or availability of materials and equipment.