

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO  
CANADIAN MANUFACTURERS & EXPORTERS INTERROGATORY #1

INTERROGATORY

Issue A.I. Are the proposed facilities needed? Considerations may include but are not limited to demand, reliability, security of supply, flexibility, constraints, operational risk, cost savings and diversity as well as the Board's statutory objectives.

Ref: EB-2012-0451, Exhibit A, Tab 2, Schedule 1

1. What would be the impact, if any, on the GTA Project if the Parkway West Project requested in EB-2012-0433 is not approved or is modified, or the timing is changed?
2. What would be the impact, if any, on the GTA Project if the Union Brantford-Kirkwall and Parkway D Compressor expenditures as requested in EB-2013-0074 is not approved or is modified, or the timing is changed?
3. What would be the impact, if any, on the GTA Project if TCPL does not obtain NEB approval for the Bram West Interconnect point, or if the NEB modifies TCPL's proposal or the timing is changed?

RESPONSE

- 1) If Parkway West, as proposed in EB-2012-0433 is not approved, or the timing is changed, the following impacts would be expected:
  - a. Parkway West Gate station, the associated tie-in section, and the Parkway bypass regulation would not be able to be utilized and would therefore not be constructed until Parkway West was approved and constructed. The diversity of entry points and backup capability to Parkway would not be achieved until these facilities are in service.

The additional facilities in Union's EB-2013-0074, are, to Enbridge's understanding, dependent on the Parkway West facility being in place. It is

Witness: C. Fernandes

Enbridge's understanding that these facilities are required in order to provide the additional short haul volumes for the Segment A pipeline, and therefore Segment A could not be supplied with the requested volumes. Therefore Segment A would not be built and the substantial gas supply benefits as described in Exhibit A, Tab 3, Schedule 5 would not be realized. Segment B could still be constructed and would provide limited benefits as per BOMA Interrogatory # 29 at Exhibit 1.A4.EGD.BOMA.29.

- 2) Please refer to 1a) above.
- 3) The MOU is shown at I.A1.EGD.CME.6. This agreement states that if Regulatory approvals are not granted, or are granted on terms unfavourable to Enbridge, including material timing changes, Enbridge would be free to pursue other alternatives, including, but not limited to, extending Segment A back to Parkway West as per the original filing in December, 2012. If TransCanada does not receive approval for the BramWest interconnection point, there would potentially be no sharing of the Segment A pipeline. There is no impact to the GTA project scope if the sharing arrangement is not approved as the project is feasible under all outcomes as per Board Staff Interrogatory # 48 at Exhibit I.D5. EGD.STAFF.48.