

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO
ENVIRONMENTAL DEFENCE INTERROGATORY #38

INTERROGATORY

Interrogatory No. A.3-ED-38 Reference: Ex. A, Tab 2, Sch. 4, Page 1

- a) Please state Enbridge's incremental cost of connecting its system to TransCanada's Bram West Interconnect (to achieve increased diversity of supply) assuming DSM has eliminated demand growth and hence the need for increased pipeline capacity to meet the needs of customers in the GTA Project Influence Area.
- b) Assuming DSM has eliminated demand growth and hence the need for increased pipeline capacity to meet the needs of customers in the GTA Project Influence Area, could Enbridge achieve increased diversity of supply by connecting its system to TransCanada's Bram West Interconnect? If further steps would be necessary to achieve increased diversity of supply, please state what those steps are and their incremental cost.

RESPONSE

- a) and b) Enbridge is of the opinion that DSM cannot be expected to eliminate demand growth as per Exhibit A, Tab 3, Schedule 7, paragraph 3. Eliminating the demand growth in the area does not eliminate the need for the proposed facilities as per the response to Environmental Defence Interrogatory #20 at Exhibit I.A4.EGD.ED.20. In order to achieve increased diversity of supply for the GTA, in addition to the Bram West interconnect, all of Segment A and Segment B would still be required, along with the Parkway West gate station and associated facilities. Without the additional pipelines and associated facilities, supply cannot be diversified as the system lacks the capacity to move the supply to the eastern portions of the GTA Influence Area and the downtown core.