ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO ENVIRONMENTAL DEFENCE INTERROGATORY #39

INTERROGATORY

Issue A.4 "What are the alternatives to the proposed facilities? Are any alternatives to the proposed facilities preferable to the proposed facilities?"

Interrogatory No. A.4-ED-39 Reference: Ex. A, Tab 3, Schedule 1

a) Please provide a table indicating the following estimates for each year from 2014 to 2025 for the GTA Project Influence Area:

   i. The estimated reduction in peak hourly consumption (GJ/hour) resulting from industrial DSM as assumed in Enbridge's growth forecast at Exhibit A, Tab 3, Schedule 4;

   ii. The estimated reduction in peak hourly consumption (GJ/hour) resulting from the implementation of all industrial DSM programs with a TRC benefit-cost ratio of 1 or greater; and

   iii. The estimated yearly resource acquisition industrial DSM budget needed to implement all industrial DSM programs with a TRC benefit-cost ratio of 1 or greater.

   Please show your analysis and state all assumptions.

b) If targeted DSM necessary to defer or avoid the GTA Project must be located in a certain sub-area inside the overall GTA Project Influence Area (as discussed in Environmental Defence's interrogatory no. A.4-ED-24), please also provide the above-described table based on that targeted DSM sub-area.

Witnesses: F. Oliver-Glasford
T. MacLean
J.Ramsay

RESPONSE

a)

i. Please see below the chart requested in I.A4.EGD.ED.39a) i.

Please also note that Enbridge does not communicate, measure or interpret DSM reductions on a peak hour basis. The above calculations of DSM's impact on peak hour demand have been created using a set of theoretical assumptions listed in I.A4.ED.14 a). These assumptions include:

- the use of a linear conversion ratio to derive peak day from annual figures and peak hour from peak day;
    - In practice the conversion ratio will not be linear and will vary between DSM measures and customer segments.
- static cost effectiveness as conservation budgets increase (i.e. each incremental m3 saved is priced at the same as the first m3).

Peak Hour Demand reduction GTA Area	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
(10^3m^3)	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4
GJ	54.5	54.5	54.5	54.5	54.5	54.5	54.5	54.5	54.5	54.5	54.5	54.5

ii. The data required to provide this analysis is not available to Enbridge. A 2008 DSM Potential Study filed as EB-2011-0295 Ex.B, Tab 2, Sch. 7, estimated the potential results from implementation of all industrial DSM programs with a TRC benefit-cost ratio of 1 or greater across the franchise area. While the GTA Project Area represents approximately 48% of the customers across the franchise area, it does not represent 48% of the industrial customers. As a result, the Company cannot extrapolate the Potential Study results to the GTA Area.

iii. See response to item (ii) above.

b) Please see the Response to Environmental Defence Interrogatory #24 at Exhibit I.A4.ED.24.

Witnesses: F. Oliver-Glasford
T. MacLean
J.Ramsay