

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO  
ENVIRONMENTAL DEFENCE INTERROGATORY #18

INTERROGATORY

Issue A4: "What are the alternatives to the proposed facilities? Are any alternatives to the proposed facilities preferable to the proposed facilities?"

Reference: Ex A, Tab 3, Schedule 7, page 3

Please explain why Enbridge believes that "[c]onservation efforts... cannot be expected to replace the capacity within the system due to the lowering of pressures on large diameter, higher pressure lines."

RESPONSE

Enbridge believes that the magnitude of conservation required to replace the capacity within the system due to the lowering of pressures on large diameter, higher pressure lines is too large to be achievable. Based on estimates consistent with those shown in the response to Environmental Defence Interrogatory #14 found at Exhibit I.A4.EGD.ED.14, the DSM requirement needed to lower the pressure as proposed in the NPS 26 and NPS 30 Don Valley line would be a greater than a 20-fold increase in the GTA. In addition to the sheer scale of the conservation that would be required, the certainty of achieving the conservation targets is unknown. Magnitude and certainty make conservation a non-viable option for replacing capacity as a result of lowering pressures in existing infrastructure.

The primary purpose of the application is for increased safety and reliability in the delivery of natural gas, as stated in Exhibit A, Tab 3, Schedule 1. Enbridge is of the opinion that even if load growth and lowered capacity were offset by efficiency gains, which we do not believe is a reasonable assumption, that the proposed facilities would not be significantly altered, as they are required to meet the other objectives of the project.

Witnesses: T. MacLean  
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