

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO
ENVIRONMENTAL DEFENCE INTERROGATORY #20

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, pages 1-3

Has Enbridge analysed the potential for incremental DSM measures, programs and budgets to defer the need for all or part of the proposed GTA Pipeline Project? If yes, please provide copies of all of these analyses and studies.

RESPONSE

The GTA Project has multiple purposes. It meets customer growth, reduces operational risks, enhances safety and reliability, provides entry point diversity, improves supply chain diversity and reduces upstream supply risks and costs. (See Exhibit A, Tab 3, Schedule 1).

DSM may be able to address some of the growth demand, but not reliability, entry point and distribution system diversity, or supply chain needs. If there were no load growth, all of the project facilities would be required in order to meet the other objectives.

Considering a “growth only” scenario alone:

- The growth forecast has already incorporated conservation at current levels.
- To offset all the forecasted growth, it is estimated that an overall DSM budget twice the current level, with the entirety of the incremental spend used for the GTA Project Influence Area, is required every year moving forward.
- The “growth only” component of the GTA Project, namely the extension of the NPS 36 line from Sheppard north to McNicol Avenue is estimated to cost \$40M to \$50M.¹

¹ Unclassified estimate.

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

- The timeframe required to increase DSM programs is insufficient given the scale and date the delivered results are required.
- It is uncertain whether and when the conservation targets can be achieved, noting the fact that the Company has not fully utilized its budget opportunity historically.

Given the uncertainty and challenge in scaling DSM programs to address the growth objective, and given that reliability and upstream concerns (as stated in Exhibit A, Tab 3, Schedule 5) cannot be resolved by any DSM efforts, DSM measures are not a viable alternative to the GTA Project. As a result, no in-depth analysis of potential incremental DSM measures, programs and budgets was undertaken.

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