

ENBRIDGE GAS DISTRIBUTION INC. RESPONSE TO
ENVIRONMENTAL DEFENCE INTERROGATORY #24

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 4, page 1 & 2

Enbridge's growth forecast relates to the "GTA Project Influence Area." This is described by Enbridge as "the areas of the Enbridge distribution network where growth had a direct impact on the pressures at the current point of minimum system pressure, located at Station B."

- a) Please provide a map indicating the detailed boundary of the GTA Project Influence Area.
- b) Please describe the boundary of the GTA Project Influence Area using street names and intersections.
- c) Assuming that the load growth to be addressed by the proposed facilities were to be instead addressed by targeted DSM (and assuming that this is possible), could that DSM be implemented in any of the 152 smaller geographic areas inside the larger GTA Project Influence Area? For example, would targeted DSM need to be predominantly located in an area nearby to station B or in areas served by proposed segment B?
- d) If targeted DSM would need to be located in a sub-area inside the larger GTA Project Influence Area, please:
 - i. Provide a map and detailed written description of that DSM sub-area,
 - ii. Explain why the project can be justified based on all growth within the GTA Project Influence Area but demand reductions in this same area could not address load growth issues, and
 - iii. Provide additional set answers to Environmental Defence's interrogatory numbers 2-15, 17, 25, and 26 based on this DSM sub-area (i.e. with necessary modifications to provide responses with respect to this sub-area rather than the entire GTA Pipeline Project Influence Area.

Witness: E. Naczynski

RESPONSE

- a) Please see the Attachment for a map with the boundaries of the GTA Project Influence Area.
- b) Please see the Attachment for a map with the boundaries of the GTA Project Influence Area.
- c) Enbridge does not believe that targeted DSM can eliminate the need for some or all of the proposed facilities as described in the response to Environmental Defence Interrogatory #20 found at Exhibit I.A4.EGD.ED.20.
- d) Enbridge does not believe that targeted DSM can eliminate the need for some or all of the proposed facilities as described in the response to Environmental Defence Interrogatory #20 found at Exhibit I-A4.EGD.ED.20.

Witness: E. Naczynski