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EGD to provide model simulation related to the pressures at Station B in response to GEC scenarios.

RESPONSE

It should be noted that Enbridge does not agree with the assumptions in this analysis.

Portlands Energy Centre ("PEC") has a 20 year Gas Delivery Agreement for firm service with Enbridge, and further paid a contribution in aid of construction to receive such service. As mentioned on Hearing Day 6 at transcript page 88, lines 17 to 20, "Portlands is systemically important to the electric system, and they also stated that they have run every single peak winter day since being in operation". Enbridge considers peak weather conditions as foreseeable and would therefore not consider interrupting PEC or using terms within its contract (i.e., force majeure) to shed its firm load under cold weather conditions. It does not view failing to meet firm commitments as a reasonable alternative to prudent system planning and would not consider potentially jeopardizing the reliability of the electric system to increase the reliability of the natural gas system when the proposed facilities increase the reliability of both systems.

Simulations were completed as requested for 2015 using steady state modeling with PEC and all large interruptible loads removed in downtown core of Toronto. The NPS 26 and the Don Valley line are running at 30% of SMYS.

- With No reinforcements: model out of pressure at Station B
- With Segment A only: model out of pressure at Station B
- Segment A and East-West portion of Segment B: 262 psi at Station B

Witness: E. Naczynski