

UNDERTAKING JT2.36

UNDERTAKING

TR 2, page 187

To respond to ED letter from #12 onwards or explain why it cannot be provided or explain where it has already been provided.

RESPONSE

The following are responses from the Environmental Defence letter dated June 11, 2013 from #12 onwards. Responses to the first 7 questions (#3, 4, 5, 6, 7, 8, and 9) were provided at the Technical Conference. Written responses to #4 and 8 have also been included below.

**Interrogatory No. I.A4.EGD.ED.4**

In the letter from Environmental Defence, dated June 11, 2013:

*This interrogatory requested “for each year from 2000 to 2025 inclusive Enbridge’s actual/forecast total number of residential, commercial, apartment and industrial customers in the GTA Project Influence Area.”*

- (i) *No data was provided for 2022 to 2025 and no explanation was provided for this missing data. We request this data be provided.*
- (ii) *The response states that “[t]o present historical information for the GTA project Influence Area, customer numbers have been derived based on one or more data systems...” Please provide fully describe the assumption and methodology used by Enbridge to derive this historical data in this and other interrogatory responses.*

Enbridge provides the following response:

- (i) The forecast of customer growth was originally carried out for the period from 2013 to 2021. To extend the forecast to 2025 for purposes of the GTA Application, the Company used the same level of growth as in 2021 for each of the years to 2025 based on number of customers.

Witnesses: C. Fernandes  
T. MacLean  
E. Naczynski  
F. Oliver-Glasford  
J. Ramsay  
M. Suarez

The table of Total Customers by Sector, originally provided in I.A4.EGD.ED.4, failed to extend the forecast period beyond 2021 and it was not acknowledged in the explanation. That table is here updated to provide the full forecast from 2013 to 2025.

<b>Total Customers by Sector</b>				
	<b>Apartment</b>	<b>Commercial</b>	<b>Industrial</b>	<b>Residential</b>
2004	4,424	68,606	4,773	777,117
2005	4,471	69,885	4,792	796,860
2006	4,497	71,388	4,798	816,062
2007	4,540	73,351	4,805	832,492
2008	4,543	74,848	4,807	849,520
2009	4,564	76,250	4,807	863,284
2010	4,600	77,449	4,812	873,205
2011	4,675	78,626	4,812	884,673
2012	4,701	79,543	4,816	893,936
2013	4,729	80,563	4,823	904,728
2014	4,803	81,718	4,824	916,831
2015	4,872	82,918	4,827	928,500
2016	4,943	84,208	4,830	940,776
2017	5,014	85,535	4,833	953,383
2018	5,083	86,785	4,835	966,418
2019	5,152	88,037	4,837	979,565
2020	5,220	89,288	4,839	992,896
2021	5,287	90,549	4,841	1,006,431
2022	5,354	91,819	4,843	1,020,180
2023	5,421	93,088	4,845	1,033,928
2024	5,488	94,357	4,847	1,047,676
2025	5,555	95,626	4,849	1,061,424

The forecast is layered on the derived actuals, as further explained in part (ii) on the next page, and is denoted by the shaded area.

- (ii) The Company has not historically tracked customer information for sub-areas such as the GTA Project Influence Area. Instead, it relies on geographical areas denoted as Areas 10, 20, 30, 40, 50, 60, and 80 to track customer counts in different areas of the franchise within its Customer Information System (“CIS”). The GTA Project Influence Area resides in Areas 10, 20, and 30.

Witnesses: C. Fernandes  
 T. MacLean  
 E. Naczynski  
 F. Oliver-Glasford  
 J. Ramsay  
 M. Suarez

To derive customer numbers within the GTA Project Influence Area, it was necessary to map customers to the boundaries delineated by the influence area using postal Forward Sortation Areas (“FSAs”) as tracked in the Pipeline Maintenance Tracking System (“PMTS”), which is the Company’s asset information database. PMTS data were queried for total customers within the GTA Project Influence Area as well as for the total customers in Areas 10, 20, and 30 for each year of history provided.

The ratio of customers in the GTA Project Influence Area relative to the combined Area 10, 20, and 30 as determined in PMTS was used to prorate the customer numbers as tracked in CIS to derive the historical customers within the GTA influence area for each year.

**Interrogatory No. I.A4.EGD.ED.8**

In the letter from Environmental Defence, dated June 11, 2013:

*This interrogatory requested “for each year from 2000 to 2025 inclusive the actual/forecast total demands (TJ/year) and average annual demands (GJ/year)” for certain customer classes.*

*Enbridge did not provide the total or average demands as requested. Instead, it referred to a portion of the evidence containing the incremental demands of new customers, which is not the information requested in this interrogatory.*

*Enbridge also stated that “[p]ipeline and facilities requirements are based on total peak hourly demand.” However, that does not mean that the requested data is irrelevant. The annual demands are relevant to DSM as a possible alternative. For example, DSM programs are often described in terms of annual demands. Furthermore, annual demands could be a factor in determining the economic cost/benefit analysis of DSM as an alternative.*

*We therefore ask that a complete response (existing and incremental) be provided.*

Enbridge provides the following response:

As indicated in the response to Board Staff Interrogatory #15 found at Exhibit I.A3.EGD.STAFF.15, the Company has not historically tracked information for sub-areas such as the GTA Project Influence Area. To present historical information, Enbridge has used actual volumes from Franchise Areas 10, 20, and 30 from the billing system to proxy for volumes in the GTA Project Influence Area. Average use forecasts by sector using 2013 Board-approved average use were applied to GTA Project Influence area customer growth forecasts to project total annual demands.

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

As previously noted, Enbridge does not track the specific information that has been requested as the information is not required for system planning or rate-making purposes. As such, Enbridge has derived the data and provided the information to respond to the interrogatory and are for illustrative purposes only. Any potential inconsistencies may or may not be easily traceable. Interpretations or conclusions from the derived data should be weighed accordingly.

With respect to the forecast average usage beyond 2013, data is not available.

Total Illustrative Annual Demand and Average Use GTA Project Influence Area, by Sector, 2000-2025									
	Residential		Commercial		Apartment		Industrial		Total
	Volumes (10 <sup>6</sup> m <sup>3</sup> )	Rate 1 Average Use (m <sup>3</sup> )	Volumes (10 <sup>6</sup> m <sup>3</sup> )	Rate 6 Average Use (m <sup>3</sup> )	Volumes (10 <sup>6</sup> m <sup>3</sup> )	Rate 6 Average Use (m <sup>3</sup> )	Volumes (10 <sup>6</sup> m <sup>3</sup> )	Rate 6 Average Use (m <sup>3</sup> )	Volumes (10 <sup>6</sup> m <sup>3</sup> )
2000	2,723	3,092	2,353	18,000	1,024	82,043	1,661	59,697	7,761
2001	2,638	2,960	2,278	17,750	992	82,147	1,562	55,885	7,470
2002	2,799	2,953	2,372	17,744	1,028	83,354	1,597	54,315	7,795
2003	3,068	2,938	2,522	17,738	1,092	84,736	1,597	57,283	8,279
2004	2,928	2,889	2,404	17,611	1,032	84,719	1,579	52,838	7,944
2005	3,043	2,815	2,465	17,200	1,034	81,085	1,581	53,657	8,124
2006	2,813	2,776	2,318	17,362	988	88,822	1,509	56,659	7,628
2007	3,042	2,769	2,436	17,831	1,014	103,512	1,515	61,632	8,007
2008	3,066	2,737	2,363	18,614	1,017	128,289	1,447	76,114	7,893
2009	3,066	2,694	2,234	19,133	965	145,642	1,234	89,273	7,498
2010	2,859	2,657	2,122	19,818	979	164,942	1,264	108,449	7,224
2011	3,041	2,618	2,295	20,261	1,004	154,154	1,278	109,505	7,619
2012	2,699	2,601	2,040	20,240	903	151,332	1,202	107,958	6,844
2013	2,730	2,568	2,063	20,230	914	154,877	1,202	109,481	6,910
2014	2,760		2,087		925		1,203		6,975
2015	2,776		2,100		931		1,203		7,010
2016	2,808		2,127		942		1,203		7,080
2017	2,841		2,153		952		1,203		7,150
2018	2,875		2,178		963		1,204		7,219
2019	2,909		2,203		974		1,204		7,290
2020	2,943		2,229		984		1,204		7,360
2021	2,978		2,254		995		1,204		7,431
2022	3,013		2,280		1,005		1,204		7,503
2023	3,049		2,306		1,015		1,205		7,575
2024	3,084		2,331		1,026		1,205		7,646
2025	3,102		2,344		1,031		1,205		7,682

Volumes: Actual volumes from 2000 - 2012 represent Franchise Areas 10, 20, 30.  
 Forecast volumes for 2013 and 2014 taken by applying 2013 average annual volume per customer on customer growth forecasts for 2013 & 2014 for the GTA Project Influence Area as shown in I.A4.EGD.ED.2. Average Annual volume as shown at Ex E Tab 1 Schedule 1 page 8.  
 Forecast volumes for 2015-2025 for the GTA Project Influence Area incrementally added from Ex E T1 S1 p.8.

Average Use: Actual average use volumes normalized to 2013 Board-Approved degree days by General Service sector.  
 Forecast average use currently available for 2013 Test year only.

All forecasts denoted in shaded areas.

Witnesses: C. Fernandes  
 T. MacLean  
 E. Naczynski  
 F. Oliver-Glasford  
 J. Ramsay  
 M. Suarez

**Interrogatory No. I.A4.EGD.ED.12**

In the letter from Environmental Defence, dated June 11, 2013:

*This interrogatory requested that Enbridge “fully describe the methodology and assumptions for Enbridge’s annual residential, commercial, apartment and industrial customer load growth forecasts from 2013 to 2025 inclusive in the GTA Project Influence Area. . .”*

*(i) Enbridge did not explain the methodology and assumptions used to derive its incremental customer forecast, and we therefore ask that this be provided.*

*(ii) Enbridge’s response states that an “additional reduction factor” was applied for that GTA Project and that this additional factor is explained in the response to Environmental Defence Interrogatory No. 13 (c). However, that reduction factor is not in fact explained therein. We ask that an explanation be provided.*

Enbridge provides the following response:

(i) Please see the Company’s response to GEC Interrogatory #13 found at Exhibit I.A1.EGD.GEC.13. The starting point of the customer additions forecast is the long-range forecast for customer growth as developed as part of Enbridge’s Long Range Plan process. To derive customer growth within the GTA Project Influence Area for the purpose of load simulation, it was necessary to map customers to the boundaries delineated by the Influence Area using each postal Forward Sortation Area (“FSA”) as tracked in the Pipeline Maintenance Tracking System (“PMTS”), which is the Company’s asset information database. PMTS data were queried for total customers within the GTA Project Influence Area as well as for the total customers in Areas 10, 20, and 30 for each year of history provided. Through regression analysis, correlations with PMTS data were used to translate the LRP customer additions forecasts for Areas 10, 20, and 30 to GTA Project Influence Area equivalents.

(ii) Please refer to the response to Undertaking JT2.29.

**Interrogatory No. I.A4.EGD.ED.13**

In the letter from Environmental Defence, dated June 11, 2013:

Witnesses: C. Fernandes  
T. MacLean  
E. Naczynski  
F. Oliver-Glasford  
J. Ramsay  
M. Suarez

*This interrogatory is related to Enbridge's growth forecast and the reduction factor applied to account for DSM and customer losses.*

*(i) What are the units for the data in Table 1? Are they per customer averages?*

*(ii) In the response to part (a) of this interrogatory, Enbridge did not include the loads of its unbundled customers in the data and did not explain why that information was omitted. Please provide a revised interrogatory response including a best estimate of the unbundled customers, stating assumptions if necessary. Alternatively, please explain why this information cannot be provided.*

*(iii) With respect to part (c) of this interrogatory, please provide a break out of the reduction factor according to efficiency gains and customer losses as requested.*

*(iv) Part (c) of this interrogatory asks that Enbridge fully explain how its DSM reduction factor is calculated. Enbridge's response states that "The reduction factor was developed using gate station daily demand trends in the GTA. Please provide the time period of the trend analysis and explain how the trend was calculated.*

*(v) With respect to part (c) of this interrogatory, Enbridge simply states that the reduction factor is 0.65. Please explain what units the 0.65 reduction factor is in and explain how the factor is applied.*

*(vi) With respect to part (c) of this interrogatory, please explain whether the reduction factor was applied to existing loads.*

*(vii) Please provide a response to part (d) of this interrogatory.*

Enbridge provides the following response:

- (i) Please see the June 13, 2013 Technical Conference transcript starting on page 161 at line 27 and ending on page 162 at line 9. The data includes customer averages for peak hourly load in cubic meters per hour.
- (ii) Please see the June 13, 2013 Technical Conference transcript starting on page 179 at line 19 and ending on page 180 at line 6.
- (iii) The reduction factor was not a bottom up detailed aggregation of individual items. Please refer to the response to Undertaking JT2.29. The factor was a top down estimate of the total impact of all factors impacting peak demand on the system.

Witnesses: C. Fernandes  
T. MacLean  
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- (iv) Please refer to the response to Undertaking JT2.29.
- (v) The reduction factor has no units as it is a multiplier. Please see the June 13, 2013 Technical Conference transcript starting on page 152 at line 23 and ending on page 152 at line 26.
- (vi) Please refer to the response to Undertaking JT2.29.
- (vii) Please refer to the response to Undertaking JT2.29.

**Interrogatory No. I.A4.EGD.ED.14**

In the letter from Environmental Defence, dated June 11, 2013:

*(i) Part (a) of this interrogatory requested the forecast impact of DSM as calculated using the "reduction factor" for each year from 2014 to 2025. However, the response provided just one number, 13,000 cubic metres per hour. Please provide the values for each year or an explanation of why the result is constant over time.*

*(ii) Part (b) of this interrogatory asked that Enbridge "state the amount of DSM, in addition to that assumed in Enbridge's forecast, that would be needed to meet Enbridge's customers' needs in the GTA Project Influence Area in each year from 2014 to 2025 inclusive." Enbridge's response provided annual data, but not hourly data, even though required pipeline facilities are a function of peak hourly demand. Please provide the amount of DSM in cubic metres per hour on peak that is needed to avoid the pipeline in each year from 2014 to 2025 inclusive.*

*(iii) According to Enbridge's response, additional annual DSM savings of 77,811,000 cubic metres per year would be needed in the GTA to meet growth needs without the pipeline. According to Enbridge this would entail an annual increase of the DSM budget of approximately \$33.8 million.*

*Environment Defence requested Enbridge's "analyses" to support its incremental DSM estimates. However, Enbridge has not provided us with its inputs or calculations to support the above estimates. Please provide these inputs and calculations so we can understand how \$33.8 million cost was calculated. Please also provide Enbridge's estimate of the net TRC benefits of these incremental DSM programs (see also ED IR No. 40).*

Enbridge provides the following response:

- (i) Please see the June 13, 2013 Technical Conference transcript starting on page 162 at line 10 and ending on page 164 at line 6.

Witnesses: C. Fernandes  
T. MacLean  
E. Naczynski  
F. Oliver-Glasford  
J. Ramsay  
M. Suarez

- (ii) ED's Interrogatory #14 did not request that the amount of DSM necessary to offset GTA load growth be expressed as peak hour demand reduction. DSM results are forecast and reported in annual savings. For the purposes of this response, the Company has converted the annual results to peak hour demand reduction. Please see below the amount of DSM necessary to offset GTA load growth expressed as peak hour demand reduction. Please note that this increase in DSM would account only for the load growth portion of the GTA Project and does not address any other component of the Project.

DSM Required to Offset Growth in the GTA Project Influence Area	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Additional Peak Hour DSM Needed in GTA (10 <sup>3</sup> m <sup>3</sup> )	25	25	25	25	25	25	25	25	25	25	25	25

- (iii) Please see Enbridge's response to Undertaking JT2.20 for a more detailed description of the Company's calculations in generating illustrative figures for the additional DSM results necessary to offset load growth in the GTA as well as the TRC benefits associated with this increase.

In regards to ED's request for the Company's methodology for calculating the corresponding budget increase, Enbridge divided current forecast annual DSM results by the total franchise-wide DSM results necessary to offset GTA growth (a figure derived for illustrative purposes, and which has a large degree of uncertainty) to create a factor representing the increase in DSM results that would be necessary to offset GTA load growth annually (313%). The portion of the current budget proposed for 2014 in the GTA area (48% of the entire 2014 budget) was then multiplied by the above noted factor, resulting in a GTA specific budget of approximately \$50M, and a franchise-wide DSM budget of approximately \$67 million annually. For greater clarity, the total GTA Project Influence Area DSM spending to offset the GTA load growth (but not address any of the Project's other drivers) would be approximately \$50 million, roughly three times the currently projected DSM spending for the GTA area per year. If the required DSM budget to offset the load growth portion of the project only were projected out over the forecast of

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the initiative (i.e., ten years of growth offset), required DSM spending in the GTA would be over \$500 million.

**Interrogatory No. I.A4.EGD.ED.17**

In the letter from Environmental Defence, dated June 11, 2013:

*According to the response to ED IR No. 17, the GTA system has a peak hour capacity of 3,037,000 cubic metres. According to the response to ED IR No. 3, the peak hour demand in 2015/16 will be 2,978,023 cubic metres. Thus, according to those figures, there will be a capacity surplus of 58, 977 cubic metres in 20 15/16. This is equivalent to a surplus of 2.2 TJ since there are 37.69 MJ/cubic metres (ED IR No. 3).*

*However, according to response to ED IR No. 25, in 2015/16, there is capacity deficit of 15,000 cubic metres per hour.*

*Please explain the error or discrepancy.*

Enbridge provides the following response:

Please see the June 13, 2013 Technical Conference transcript starting on page 164 at line 7 and ending on page 165 at line 4.

**Interrogatory No. I.A4.EGD.ED.19**

In the letter from Environmental Defence, dated June 11, 2013:

*This interrogatory asks:*

*When did Enbridge start to analyse the potential for incremental DSM programs and budgets to defer the need for some or all of the proposed GTA Pipeline Project? Please provide copies of the written materials prepared by Enbridge in this regard corresponding to this start date.*

*The response does not provide (i) the date when DSM was first considered and screened out as an alternative, (ii) the analyses used to screen out DSM, or (iii) the written materials prepared by Enbridge in this regard. Enbridge did not explain why that requested information was omitted, and we therefore ask that it be provided.*

Enbridge provides the following response:

Please see the June 13, 2013 Technical Conference transcript starting on page 165 at line 5 and ending on page 166 at line 24.

Witnesses: C. Fernandes  
T. MacLean  
E. Naczynski  
F. Oliver-Glasford  
J. Ramsay  
M. Suarez

**Interrogatory No. I.A4.EGD.ED.24**

In the letter from Environmental Defence, dated June 11, 2013:

*Part (c) of this interrogatory asks:*

*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?*

*Enbridge did not respond to part (c) or (d) of this interrogatory and instead simply stated that "Enbridge does not believe that targeted DSM can eliminate the need for some or all of the proposed facilities." However, Environmental Defence was not asking whether targeted DSM can eliminate the need for the project. Instead, we were asking, in essence, where targeted DSM would need to be located if it were the case that DSM could sufficiently address load growth issues. We ask that a full response be provided to parts (c) and (d) of this interrogatory.*

Enbridge provides the following response:

Please see the June 13, 2013 Technical Conference transcript starting on page 174 at line 23 and ending on page 178 at line 24.

**Interrogatory No. I.A4.EGD.ED.25**

In the letter from Environmental Defence, dated June 11, 2013:

*Please provide the annual demand forecast from 2013 to 2025 as requested. No explanation has been provided for what this information was omitted.*

Enbridge provides the following response:

The Company did provide the requested data in Exhibit I.A4.EGD.ED.25 including reference to Exhibit I.A4.EGD.ED.3

**Interrogatory No. I.A4.EGD.ED.26**

In the letter from Environmental Defence, dated June 11, 2013:

*Please provide a response to part (e) of this interrogatory, which requested "Enbridge's forecast of its Ontario customers' peak hour, peak day and annual demands for natural gas (net of DSM) for each year from 2013 to 2025 inclusive." Enbridge has stated that this information is not*

Witnesses: C. Fernandes  
T. MacLean  
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*available, but there is no apparent reason why it cannot be created. Environmental Defence wishes to know the annual demands of all of Enbridge's Ontario customers to evaluate whether this proposal (which is predicated on steadily increasing gas usage in the GTA) is consistent with Ontario's greenhouse gas emission reduction targets.*

Enbridge provides the following response:

As indicated in the original interrogatory response, the application deals with facilities in the GTA only. Enbridge has not compiled information for its entire franchise in a comparable fashion and this information is not available.

**Interrogatory No. I.A4.EGD.ED.39**

In the letter from Environmental Defence, dated June 11, 2013:

*Parts (a)(ii) and (iii) of this interrogatory requested the following:*

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

*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.*

*Enbridge responded as follows: "The data required to provide this analysis is not available to Enbridge. A 2008 DSM Potential Study filed as EB-201 1-0295 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." It is not apparent why an estimate of the cost-effective industrial DSM potential cannot be produced as long as certain assumptions are made, such as assumptions relating to the proportion of Enbridge's industrial customers that are located in the GTA Area. We ask that Enbridge estimate the cost-effective industrial DSM potential (as requested in the interrogatory) based on a reasonable set of assumptions. As indicated in the interrogatory, we ask that you "show your analysis and state all assumptions."*

Enbridge provides the following response:

As stated in the interrogatory response, "The data required to provide this analysis is not available to Enbridge." The amount of assumptions required to determine all cost effective DSM looking forward would be substantial as would the uncertainty in the assumptions. The 2008 DSM Potential Study, a comprehensive study building some

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basis on which to make estimates on cost effective, and achievable results from the market, estimated annual results across the franchise area. The annual gas savings in 2017 from implementation of all Achievable measures in the industrial sector with a TRC cost benefit ratio of one or greater was estimated by the DSM Potential Study as 48Mm<sup>3</sup>. The associated annual budget in the industrial sector was estimated as \$4.4M.

**Interrogatory No. I.A4.EGD.ED.40**

In the letter from Environmental Defence, dated June 11, 2013:

*This interrogatory requested “Enbridge’s best estimates of the economic benefits in each year from 2013 to 2025 inclusive of DSM measures that would be sufficient to avoid the need for increased pipeline capacity to meet the forecast rising demand for natural gas in the GTA Project Influence Area.”*

*Enbridge did not calculate all of the gas supply savings on the grounds that “Enbridge does not believe that increased DSM can realistically be expected to offset the forecast load growth.” However, this is not a valid reason to not provide an interrogatory response. Environmental Defence requests that a full and adequate response be provided.*

*Environmental Defence requires this key information to calculate the net benefits of DSM programs. That is, the net benefit of DSM programs is the avoided gas supply costs minus the incremental costs of the DSM measures*

Enbridge provides the following response:

As stated in the technical conference, the need for increased pipeline capacity is based on a number of requirements, including forecast load growth. If forecast load growth was eliminated, the pipeline facilities would still be required in order to meet the other requirements.

Please see the response to Undertaking JT2.20 for the incremental net TRC benefits and total franchise-wide TRC benefits that would result from the illustrative increase in DSM within the GTA Project Influence Area that would be necessary to offset load growth.

**Interrogatory No. I.A4.EGD.ED.42**

In the letter from Environmental Defence, dated June 11, 2013:

*This interrogatory requested that Enbridge:*

Witnesses: C. Fernandes  
T. MacLean  
E. Naczynski  
F. Oliver-Glasford  
J. Ramsay  
M. Suarez

*Please state the current total number of Enbridge's commercial customers. Please also provide a breakdown of those customers by type (such as schools, hotels, office buildings, etc.). Please provide all breakdowns of commercial customers by type that are available.*

*Enbridge's response included a category entitled "other" that accounts for almost 2/3 of the customers and half of the volume. Please provide a further breakdown of the "other" category and explain what it contains.*

Enbridge provides the following response:

Please see the response to Undertaking JT2.30.

Witnesses: C. Fernandes  
T. MacLean  
E. Naczynski  
F. Oliver-Glasford  
J. Ramsay  
M. Suarez