

SEC INTERROGATORY #28

INTERROGATORY

[A/1/3, p. 25] Please confirm that input assumptions and NTG factors and realization rates are different. Please provide an explanation of the differences. Please explain the difference, if any, between empirical measurement of results, and general assumptions used to determine savings.

RESPONSE

Confirmed. Input assumptions, NTG factors and realization rates are different. Providing a detailed explanation of the differences between input assumptions, NTG factors and realization rates would require a lengthy detailed response which the Company believes goes well beyond the scope of this proceeding particularly given the fact that each of the individual values and measurements are influenced to a greater or lesser degree by engineered calculations, interpretation, and empirical observations.

Regarding the difference between empirical measurement of results and general assumptions, the Company could not find a reference to this in Enbridge's evidence. Without context and an evidentiary reference, the Company is unable to answer this question. Please see the response to SEC Interrogatory # 32, found at Exhibit I.EGDI.SEC.32.

Witnesses: D. Bullock
D. Johnson