

EB-2012-0451
EB-2012-0433
EB-2013-0074

IN THE MATTER OF an application by Enbridge Gas Distribution Inc. for: an order or orders granting leave to construct a natural gas pipeline and ancillary facilities in the Town of Milton, City of Markham, Town of Richmond Hill, City of Brampton, City of Toronto, City of Vaughan and the Region of Halton, the Region of Peel and the Region of York; and an order or orders approving the methodology to establish a rate for transportation services for TransCanada Pipelines Limited;

AND IN THE MATTER OF an application by Union Gas Limited for: an Order or Orders for pre-approval of recovery of the cost consequences of all facilities associated with the development of the proposed Parkway West site; an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in the Town of Milton; an Order or Orders for pre-approval of recovery of the cost consequences of all facilities associated with the development of the proposed Brantford-Kirkwall/Parkway D Compressor Station project; an Order or Orders for pre-approval of the cost consequences of two long term short haul transportation contracts; and an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in the City of Cambridge and City of Hamilton.

**INTERROGATORIES OF
ENERGY PROBE RESEARCH FOUNDATION (“ENERGY PROBE”)
ON THE EVIDENCE OF THE GREEN ENERGY COALITION
(DIRECT TESTIMONY OF PAUL CHERNICK)
EXHIBIT L.EGD.GEC.1**

July 5, 2013

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Enbridge Gas Distribution and Union Gas Limited

ENERGY PROBE RESEARCH FOUNDATION

INTERROGATORIES

ON THE EVIDENCE OF THE GREEN ENERGY COALITION

Energy Probe 1

Ref: Exhibit L.EGD.GEC.1, Page 9

Please confirm Enbridge's DSM forecast in the GTA area.

Energy Probe 2

Ref: Exhibit L.EGD.GEC.1, Page 9

Preamble: The evidence states "The analyses by Enerlife, on behalf of Environmental Defense, suggest that bringing the company's DSM program to the top quartile of performance would reduce design-peak load by about 30 10³m³/hr each year. These load reductions would eliminate most or all of the load growth; a curtailable arrangement with PEC and/or enhancement of the interruptible load program would be available to smooth the transition and top off any shortfall in DSM deployment."

- a) Please provide a reference in Environmental Defence's evidence for the 30 10³m³/hr each year peak load reduction and confirm the customer sectors that this applies to.**
- b) Please discuss the timeframe and investment needed to bring the company's DSM program to the top quartile of performance.**
- c) Please discuss the related DSM results achieved in other jurisdictions.**

- d) Please describe the enhancements GEC envisions for the interruptible load program and quantify the load reduction potential.**
- e) Please discuss the impact on the need for Segment B1, B2 and Buttonville Station; reinforcements that Enbridge has identified in the GTA for 2017-2020; and reinforcements required after 2020, under the following scenarios:**
 - 1. 10% shortfall in accelerated DSM deployment**
 - 2. 25 % shortfall in accelerated DSM deployment**
 - 3. 50% shortfall in accelerated DSM deployment**
 - 4. No curtail agreement with PEC**
 - 5. No enhancements to interruptible load program**
 - 6. Combination of 2, 4 and 5**