

**EB-2022-0200**  
**Enbridge Gas Rebasing Application**

**Interrogatories of Environmental Defence re FRPO Evidence on  
Dawn Parkway Turnback Risk (John A. Rosenkranz)**

**Interrogatory # M4-ED-1**

Reference: Report, p. 13

Preamble:

“Even if the near-term risk is low, it would be prudent for EGI to implement measures to ... (2) reduce exposure to capacity turnback by making it less likely that the Dawn Parkway System will become overbuilt.”

Question(s):

- (a) Please discuss any measures to “reduce exposure to capacity turnback by making it less likely that the Dawn Parkway System will become overbuilt” other than those referred to in your report.
- (b) If a short-term increase in demand from in-franchise customers was expected to drive the need for a capacity upgrade, but the capacity-deficit was expected to be short-lived (e.g. five years), please discuss what changes would be needed to the STAR to allow Enbridge to address the needs by declining to renew or grant new ex-franchise contract requests.
- (c) Please discuss any other rules that would prevent Enbridge from giving priority to its in-franchise customers to avoid building out the Dawn Parkway system for short-term demand increases that are likely to disappear within a five-to-ten-year range.