FGA-NGTL-006(a)

Reference:

System Pressurization

Preamble:

The current winter supply season has seen supply conditions meet design load, with reports of TCPL system pressure in some areas declining, creating concern with security of supply.

Request:

Please identify NGTL policy and/or terms and conditions of service regarding maintaining guaranteed minimum pressure for intra-Alberta facilities.

Response:

NGTL does not guarantee minimum delivery pressures for intra-Alberta facilities. The NGTL Tariff states in Section 7.3 of the General Terms and Conditions: "The pressure of gas delivered by Company at any Delivery Point shall be the pressure available from the Facilities at that Delivery Point, provided that such pressure shall not exceed the Maximum Delivery Pressure."

The practical result of Section 7.3 is that pressure at a Delivery Point will fluctuate based on operation of the Facilities at any given point in time.

Section 9.1 of the General Terms and Conditions of the Tariff establishes NGTL's delivery obligations, which limits deliveries to available supply on a Customer basis. The practical result of Section 9.1 is that gas is available at Delivery Points at the prevailing operating pressures.

FGA-NGTL-006(b)

Reference:

System Pressurization

Preamble:

The current winter supply season has seen supply conditions meet design load, with reports of TCPL system pressure in some areas declining, creating concern with security of supply.

Request:

Please address the impact of such policies on intra-Alberta delivery points.

Response:

Please refer to the response to FGA-NGTL-006(a).

FGA-NGTL-006(c)

Reference:

System Pressurization

Preamble:

The current winter supply season has seen supply conditions meet design load, with reports of TCPL system pressure in some areas declining, creating concern with security of supply.

Request:

Please confirm that the NGTL tariff has no provision for minimum guaranteed operating pressures for intra-Alberta delivery points.

Response:

Confirmed. Please refer to the response to FGA-NGTL-006(a).

FGA-NGTL-006(d)

Reference:

System Pressurization

Preamble:

The current winter supply season has seen supply conditions meet design load, with reports of TCPL system pressure in some areas declining, creating concern with security of supply.

Request:

Please discuss how wide variations in common system operating pressures impact on engineering design for a maximum operating pressure (MOP) of 7000 KPa, common operating pressure at 5000 KPa, and minimum operating pressure at 2800 KPa.

Response:

NGTL determines its design over a broad range of operating conditions in order to meet firm transportation delivery requirements. Variations in pipeline pressure directly affect system throughput capacity such that higher pressure will yield a higher capacity.

FGA-NGTL-006(e)

Reference:

System Pressurization

Preamble:

The current winter supply season has seen supply conditions meet design load, with reports of TCPL system pressure in some areas declining, creating concern with security of supply.

Request:

Does NGTL agree that there is risk associated with security of supply and potential loss of integrity for delivery customers under the example provided?

Response:

NGTL acknowledges delivery Customers may face security of supply and loss of integrity risk. The magnitude of the risk will vary depending on pipeline system parameters such as pressure, volume and pipe size. However, NGTL takes these parameters, among other factors, into consideration when designing its system in order to ensure firm transportation requirements are met. NGTL believes the connecting downstream operator has responsibility to manage these risks and take these factors into account in its own system design and operation.

FGA-NGTL-006(f)

Reference:

System Pressurization

Preamble:

The current winter supply season has seen supply conditions meet design load, with reports of TCPL system pressure in some areas declining, creating concern with security of supply.

Request:

What concerns does NGTL recognize on pressure control with respect to specifications for pressure control and measurement equipment at intra-Alberta delivery facilities under MOP, common operating pressure, and minimum operating pressure conditions?

Response:

Please refer to the response to FGA-NGTL-006(e).