

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998, S.O. 1998, c.15, (Schedule B) (the “Act”);

**AND IN THE MATTER OF** an Application by Enbridge Gas Distribution Inc. for an order granting leave to construct an NPS 12 and NPS 8 natural gas distribution pipeline in the City of Toronto under Section 90 of the Act.

**INTERROGATORIES**

**FROM THE**

**SCHOOL ENERGY COALITION**

1. [General] Please provide copies of all reports, memoranda, analyses, emails or other documents of any type that have as their subject, or one of their subjects, the replacement or deferral of the Bathurst Reinforcement Project by DSM, whether general DSM programs, targeted load reduction programs, or otherwise.
2. [General] At the DSM Mid-Term Review Stakeholder Conference, Enbridge representatives referred to a “high level review” of IRP alternatives to the Bathurst Reinforcement Project. Without limiting the generality of Question #1, please provide a full copy of that high level review, including any scope or parameters documents (such as instructions to the person or firm doing the review), any analysis, any conclusions or reports, and any responses from system planners relating to those conclusions or reports.
3. [A/2/1, p. 1] The Application states “the customer growth in the area has reduced capacity within the gas network servicing the area”. Please provide the total customer attachments, by rate class, in the said area in each of the years 2009 to 2018, and the average and peak load for the most recent twelve months for those customers added in that period, again by rate class.
4. [A/2/1, p. 1] Please provide details of any significant loads lost or reduced during the last ten years, including without limitation the former Jewish Community Centre on Bathurst south of Ellerslie.
5. [A/2/3] Please provide copies of all materials provided to persons on the List of Interested Parties that refer to the use of conservation, load management, DSM, or similar approaches as an alternative to building additional capacity as proposed in the Application.

6. [B/1/1, p. 1, 3] Please reconcile the proposed in-service date of December, 2019 with the forecast customer additions, which start in 2020 and thus will be zero in the 2019/2020 heating season.
7. [B/1/1, p. 1] Please provide a map indicating the locations of the forecast customer additions set out in Table 1. Please provide details of the sources of the customer addition forecasts, and specify by rate class new builds vs. conversions of existing buildings to gas.
8. [B/1/1, p. 1] Please advise whether the primary reason for the project is to solve current low inlet pressures, or to meet forecast customer growth in the service area.
  - a. If it is the former, please provide details of the alternative solutions to solve that problem that have been considered, other than building more pipe.
  - b. If it is the latter, please provide details of how much deferral of the project can be achieved by reducing load in the area, either through general DSM programs focusing on that area, or targeted programs for the new additions forecast.
  - c. Please advise the timing of the project if either of the two reasons for the project is solved by other means.
9. [E/1/1, p.3] Please provide the current total annual volumes of the area that the proposed pipeline would serve, and the percentage increase in those volumes represented by the 13 million m<sup>3</sup> forecast.
10. [E/1/1, p. 5-8] Please provide the backup calculations for the annual forecast distribution revenues, including forecast load by rate class and distribution rates assumed for each year.
11. [General] Please provide an estimate, with backup calculations, of the number of homes in the subject area that would have to be retrofitted under the Home Energy Conservation program each year in order to displace the need for this reinforcement. Please provide an estimate of the annual and cumulative cost of achieving those results.

Respectfully submitted on behalf of the School Energy Coalition this October 1, 2018.

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Jay Shepherd  
Counsel for the School Energy Coalition