

VIA E-MAIL

November 9, 2019

Ontario Energy Board
Attn: Kirsten Walli, Board Secretary
P.O. Box 2319
27th Floor, 2300 Yonge Street
Toronto ON M4P 1E4

RE: EB-2019-0172– EGI Windsor Line Project - FRPO Request for Additional Discovery

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in regard to the above proceeding. In its application, Enbridge Gas Inc. (“EGI”) is requesting approval for over \$100 million to replace the majority of the Windsor Line with NPS 6 Steel main while raising the pressure. This is a significant expenditure that, in our view, the Board should allow due process to consider and determine if this level of expenditure is warranted.

In Ontario Energy Board Notice, the Board requested input on written vs. oral hearing. In our request for intervention, we recommended a Technical Conference would assist the efficacy of the process. Procedural Order No. 1 did not provide for a Technical Conference and directed a written hearing. After reviewing the Interrogatories, in our experienced opinion, the record is not sufficient to determine if the level of expenditure forecasted is warranted. We would respectfully request an Oral Hearing as we understand that another party has concerns regarding the sufficiency of information on the record.

However, we respect the value of Board resources at this time. As such, in the alternative, we would respectfully recommend that a Technical Conference facilitated by questions being advanced by parties to the Company would allow for a more fulsome record and, as a result, potentially a written hearing.

In support of our request, we offer the following:

The original sizing of the Windsor (NPS 10 with some 8) was to facilitate locally produced gas flowing west from Port Alma. Gas was collected at the site from wells on land and in Lake Erie. At Port Alma, it was scrubbed of hydrogen sulfide, compressed and sent to markets west. With little local production today, we applaud Enbridge’s move to increase the operating pressure of the line to reduce the size to NPS 6, we firmly believe that a substantive part of the project could be reduced in size reducing the cost by millions of dollars.

In response to our interrogatories, Enbridge has answered that existing demands, at this time, can be met with NPS 4 and for 10 years of growth, 40% of the pipe would need to be NPS 6¹. However, when we requested the cost of NPS 4 to allow the Board to be informed of how much could be

¹ Exhibit I.FRPO.15

saved by selective use of a smaller size, the request was refused citing infeasibility². This refusal is illogical given the response to the previous interrogatory. As a result of the refusal, the Board does not have sufficient information to understand the benefits of alternatives of more efficient design.

From the limited information provided in FRPO.7, an experienced opinion would provide that NPS 4 is sufficient east of Comber (approximately half of the project). That same interrogatory did not provide a flow required east of Tilbury South Station but it is entirely possible that NPS 2 would provide sufficient capacity for volumes east of that station. However, we have insufficient information to confirm those conclusions and to provide the Board with estimated savings relative to the proposed project.

We respectfully request the Board provide opportunity for additional discovery to assist in determining the prudent expenditure to be approved for the Windsor Line Replacement project.

Thank you for your consideration of this request

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. J. Fernandes – Board Staff
M. Kitchen, EGIREgulatoryProceedings – EGI
Interested Parties – EB-2019-0172

² Exhibit I.FRPO.16