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BY EMAIL

November 14, 2019

Ms. Christine Long
Board Secretary and Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
BoardSec@oeb.ca

Dear Ms. Long:

**Re: Ontario Energy Board (OEB) Staff Submission on FRPO request
Enbridge Gas Inc. – Windsor Pipeline Replacement Project Application
OEB File Number: EB-2019-0172**

In accordance with Procedural Order No. 2, please find attached the OEB staff submission on the FRPO request in the above proceeding. The attached document has been forwarded to Enbridge Gas Inc. and to all other registered parties to this proceeding.

Yours truly,

Original Signed By

Judith Fernandes
Project Advisor, Natural Gas Applications

Encl.



ONTARIO ENERGY BOARD

OEB Staff Submission on FRPO request

**Enbridge Gas Inc.
Windsor Pipeline Replacement
Project Application**

Application for Leave to Construct

EB-2019-0172

November 14, 2019

Introduction

On August 9, 2019, Enbridge Gas Inc. (Enbridge Gas) applied to the Ontario Energy Board (OEB) under section 90(1) of the *Ontario Energy Board Act, 1998* for leave to construct a natural gas pipeline and associated facilities between the Port Alma Transmission Station in the Municipality of Chatham Kent and the intersection of Concession 8 and County Road 46, in the Town of Tecumseh (the Project).

The Project involves the replacement of a 64-kilometre section of the Windsor Line pipeline, comprising 8-inch and 10-inch diameter sections, with a new 6-inch diameter pipeline to address integrity concerns. The estimated cost of the Project is \$106.8M.

Process

The OEB issued a Notice of Hearing on September 13, 2019. The Energy Probe Research Foundation (Energy Probe) and the Federation of Rental-housing Providers of Ontario (FRPO) were approved as intervenors and found eligible to apply for an award of costs.

On October 11, 2019, the OEB issued Procedural Order No. 1, making provision for interrogatories, interrogatory responses and submissions. Interrogatories were filed by OEB staff on October 17, 2019 and by Energy Probe, and FRPO on October 21, 2019. Enbridge Gas filed its responses to interrogatories on November 1, 2019.

On November 11, 2019, FRPO filed a letter stating that, in its view, the record of this case is not sufficient to determine if the level of expenditure forecasted is warranted. FRPO requested an opportunity for additional discovery on the application, and recommended a technical conference.

On November 13, the OEB issued Procedural Order No. 2 requesting for submissions on the merits of FRPO's request.

Submission

FRPO asked several interrogatories¹ regarding the option of using a NPS 4 pipeline either in some sections of the pipeline or for the Project entirely. In responses to these

¹ FRPO Interrogatories 12, 13, 14, 15, 16

interrogatories, Enbridge Gas stated that it had evaluated a NPS 4 pipeline and that this option was rejected as a NPS 4 pipeline would not serve the existing demand requirements on design day. When asked whether Enbridge Gas had evaluated a hybrid option of NPS 4 pipeline in some sections and NPS 6 pipeline in others for this replacement, Enbridge Gas responded that it had not evaluated a hybrid option as it had determined that an NPS 6 was the minimum size required for a replacement project operating at a 1380 kPa MOP. FRPO requested the cost differential between a NPS 4 and NPS 6 pipeline. Enbridge Gas replied that NPS 4 was not costed as an NPS 4 pipeline was not a viable solution.

OEB staff agrees with FRPO that if the OEB was inclined to explore this further alternative, more information would be required in order to assess its viability. Based on the project timelines identified by Enbridge Gas, a timely exploration of the hybrid option proposed by FRPO is tenable through a short technical conference, as recommended by FRPO, and it may be helpful to determine whether this alternative can be ruled out.

All of which is respectfully submitted.