

VIA E-MAIL

January 10, 2020

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

RE: EB-2019-0172– EGI Windsor Line Replacement – Oral Hearing Request - FRPO Reply

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in reply to the Enbridge Gas Inc. (“EGI”) response of January 8th on the issue of our request for an Oral Hearing in this proceeding. In our view, EGI has not met its onus to establish the need for the size of NPS 6 east of Comber and would potentially benefit from a hearing.

Reply

EGI assertions and our responses are outlined below:

Numerous interrogatories were answered and Enbridge Gas also provided and completed substantial undertakings stemming from the Technical Conference.

While interrogatories were answered, the quality of answers and resulting data did not support an NPS 6 pipe. The advanced questions confirmed that the NPS 6 sizing could supply over 200 times the existing demand in Port Alma¹. Further, in spite of advanced questions on the costing, the Company did not provide a witness with responsibility or experience for costing this type of project² resulting in additional undertakings.

Many of the undertakings completed by Enbridge Gas are the same areas of scope for which FRPO is now requesting to explore via an Oral Hearing.

The issues we pursued from the outset were sizing and costing which are fundamental to the approval sought.

Sizing: Since there was no evidence of additional load east of Comber in evidence or specific interrogatories, we asked that the location of these newly announced³ customer requests be

¹ Exhibit KT1.2

² TC1 Transcript, Dec. 5, 2019, pg. 25, lines 9-15

³ TC1 Transcript, Dec. 5, 2019, pg. 20, lines 8-25

specified in their distance from the Comber T. The undertaking stated that the inquiries were “in the Port Alma and surrounding area”⁴.

Costing: Without repeating our submissions of January 4th, we are trying to understand how NPS 4 installation cost can be estimated at less cost than NPS 6. In our view, the Board does not have a realistic comparative cost to determine if the incremental cost of over-sizing on speculation is appropriate.

The submissions in FRPO’s letter represent argument and do not justify further discovery. These submissions by FRPO can be made in argument.

Our inclusion of facts, piece-mealed from the evidence, were provided to demonstrate to the Board that there are gaps in the evidence that will make it difficult for parties to make argument and, more importantly, for the Board to consider alternatives to approving the Application as filed.

Conclusion

We believe that it would be in the Company's interest to address the sizing now in an Oral Hearing ahead of building the pipeline then seeking an Incremental Capital Module approval based upon prudence where these outstanding questions and concerns would be pursued further. However, we respect that the Board’s time is valuable and, if the Board were to determine that a Written Hearing is the next procedural step, we respectfully request that new dates are provided, given the passage of time since the Procedural Order of December 19, 2019 and the other Board-ordered natural gas submissions due in the next week.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. R. Torul, EGI Regulatory Proceedings – EGI
M. Millar, J. Fernandes – Board Staff
Interested Parties EB-2019-0172

⁴ Exhibit JT1.15