

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.

FOLLOWUP INTERROGATORIES

FROM THE

SCHOOL ENERGY COALITION

1. [SEC.1, Attach 2, p. 3, version attached to Reply Submissions] With respect to the map of the area served:
 - a. Please divide the increased demand of 4,370 m³/h over the ten year planning period between the high pressure area along Steeles, Bayview and Parkview, and the intermediate pressure area in the rest of the polygon.
 - b. For each of the main load increases assumed between the first estimate and the second estimate of load, please
 - i. identify where on the map the additional load is expected, and when if that is known, and
 - ii. explain why the load was not included in the original forecast.
2. [SEC.1. Attach 1, p. 5 of 49] Please explain why the SAG did not including any representatives of environmental or customer groups, despite the Applicant’s knowledge that those groups had a direct interest in geo-targeted DSM, and had experts knowledgeable in the subject.
3. [SEC.1. Attach 1, p. 14 of 49] Please describe all steps taken by the Applicant to date to determine the impact of DSM programs (whether geo-targeted or otherwise) on peak day or peak hour demand.
4. [SEC.1. Attach 1, p. 33 of 49] Please provide all information provided to ICF on the load to be displaced by DSM in the Bathurst Reinforcement area, including all information on the size, sources, timing, and locations of load that needed to be displaced.

5. [SEC.1. Attach 1, p. 33 of 49] Please provide all information provided to ICF relating to existing DSM programs in the Bathurst Reinforcement area, and the potential for additional DSM activities in that area.
6. [SEC.1, Attach 2, p. 2] Please provide the numerical data behind the two graphs on this page. If there is any data in the possession of the Applicant or ICF relating to the cost-effectiveness of the planned DSM aside from its comparison with the cost of the new facilities (for example, using the TRC Plus test), please provide that data as well.
7. [SEC.1, Attach 2, p. 2] Please provide similar graphs using the new capital cost, load forecast, and timing, and inserting the expected DSM budget required to displace the new load growth expected. Please provide the numerical data behind those graphs as well. If this analysis has not been done, please explain why. If any analysis has been done, please advise what types of cost-effectiveness analysis have been included.
8. [SEC.1, Attach 2, p. 2] Please provide full copies of the 2016 and 2017/18 Long Range Plans of Enbridge, and provide (if the information is not already contained within the documents) the material changes in methodology between the two plans, and the impacts of those changes.
9. [SEC.1, Attach 2, p. 2] Please provide all additional information in the possession of the Applicant that supports the 386% increase in load from the first load forecast to the second, or would otherwise assist the Board in understanding the reasons for that increase.
10. [SEC.1, Attach 2, p. 3, SEC.7] With respect to the commercial and apartment load growth in each of the old forecast and the new forecast:
 - a. Please identify on the map where the “additional data points” would be developed;
 - b. If the additional data points cannot be located on the map, please reconcile the built-up area served by the project with the high load growth forecast, and show that there is developable land in the area to accommodate the forecast attachments, and
 - c. Please provide a table, in the same format as SEC.3, showing the annual attachments expected by year in the forecast over the period 2020-2029.
11. [SEC.1. Attach 2, p. 3]. Please confirm that the area served by this project does not include residential or other development in the Downsview Park development plan. If it does include any part of that development area, please provide details.
12. [SEC.1. Attach 2, p. 4]. Please explain why ICF was not asked to review their DSM conclusions relative to the Bathurst Reinforcement in light of the new information in the hands of the Applicant as to load and cost. Please provide copies of all communications between the Applicant and ICF related to the new information and its impact on their conclusion.
13. [SEC.1. Attach 2, p. 4, Reply submissions, para. 29]. Please provide all analyses, studies, or other work done to support the conclusion that the “project [is] likely not possible to be affected by DSM”.

14. [SEC.6, SEC.8] Please provide a copy of any order, formal determination, letter, or other communication from the City of Toronto restricting the Applicant's ability to carry out the Bathurst Reinforcement Project to within the period April 2019 to December 2019, or prohibiting the work on the project after December 2019.
15. [SEC.11] Please confirm that the Applicant has not developed any scenarios to test how much it would cost to displace this project with geo-targeted DSM, nor what types of DSM programs would be required to achieve that result.
16. [Reply submissions, para. 14] With respect to the issue of "low inlet pressures, please provide:
 - a. Details of the inlet pressures for "this network" assumed in the information provided to ICF, and today;
 - b. Details of the additional investigations or information that caused the change in inlet pressures assumptions;
 - c. A table comparing inlet pressures for this network with the inlet pressures for each similar network in the City of Toronto;
 - d. Confirmation that, when the initial analysis was done and provided to ICF, the statement "if the primary source feeding this network were to fail during the heating season, there is a risk of losing approximately 3100 existing commercial and residential customers" was not true at that time. If confirmed, please explain how that is possible;
 - e. Confirmation that adding a redundant source to any network will, generally speaking, increase reliability. Please explain how this addition of redundancy is different from others.
17. [Reply submissions, para. 30-36] Please confirm that, as a result of the outstanding policy issues yet to be addressed by the Board, the Applicant believes that it would not be appropriate for the Applicant to use geo-targeted DSM to defer or displace facilities projects at this time.

Respectfully submitted on behalf of the School Energy Coalition this November 16, 2018.

Jay Shepherd
Counsel for the School Energy Coalition