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August 9, 2019

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Toronto, ON

Dear Ms. Walli:

**Re: EB-2018-0336 –EPCOR Natural Gas LP (ENGLP) System Integrity Projects
Phase II Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)**

Please find attached the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

Mark Garner
Consultants for VECC/PIAC

Email:

Mr. Bruce Brandell, Director Commercial Services, EPCOR Utilities Inc.
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Mr. Vince Cooney, ENGLP
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For interrogatory clarifications please contact Mark Garner at 647-408-4501 or markgarner@rogers.com

REQUESTOR NAME	VECC
TO:	EPCOR Natural Gas Limited Partnership (ENGLP)
DATE:	August 9, 2019
CASE NO:	EB-2018-0336 Phase II
APPLICATION NAME	System Integrity Projects

1.0 EXHIBIT 1 Phase 2 Evidence August 1, 2019

1.0-VECC-1

Reference: E1 & EB-2016-0236/Tab 1/Schedule 1/pg.2

The following is taken from the above EB-2016-0236 reference:

In 2017, \$425,000 is forecasted to be spent on three system integrity projects to support further development in the Belmont area, in addition to providing greater pressures to the distribution system near Brownsville and Aylmer. The planned projects include the Salford Road/Dereham line loop (\$172,600), the Mount Elgin main addition (\$224,000), and the extension of Springwater Road (\$25,000)(per SNC-Lavalin's system integrity study).

- a) Please explain if the above noted projects were completed, at what cost and in what year.
- b) Please explain the difference for the extension of the Springwater Road from the estimate above of \$25k and the \$265,015 that was actually spent of this project.

1.0-VECC-2

Reference: 2-Staff-28

In response to the Board Staff question "Why did EPCOR decide to undertake a second system integrity study?" ENGLP responded:

ENGLP decided to undertake a second system integrity study after a comprehensive review of the system integrity study completed by SNC-Lavalin for NRG. After that review, ENGLP concluded that the study did not adequately address the range of potential solutions to ongoing concerns regarding system pressures in parts of the distribution system. In particular,

ENGLP was of the view that there were viable alternatives to continuing to use natural gas priced at above market rates to support system pressure in parts of the system. (emphasis added)

In the Phase 2 evidence ENGLP explains that the reason for a new study was the resolution with Union Gas (Enbridge) to supply additional gas at Union's Bradley station (see pages 8-9).

a) Please explain the reason for the different responses?

1.0-VECC-3

Reference: EB-2016-0236 SNC-Lavalin System Integrity Study, March 2016

At pages 23-24 of the SNC-Lavalin System Integrity Study (filed August 30, 2016) it states:

7.3. RECOMMENDATION

The Glencolin Line extension, the Wilson Line extension, and the Ostrander Road Loop were simultaneously added to the model. A flow schematic showing the result of the high gas flow day is shown in Appendix F.

The result shows that the low pressure areas in the south-west quadrant and around Brownsville have been eliminated. The Brownsville area is still colored red on the results schematic, because the Ostrander Road pressure regulator is set to 30 psig. However, the pressures have increased substantially with the lowest pressure at 26 psig.

It is recommended that the Glencolin Line and the Wilson Line be extended and the Ostrander Loop be added to the NRG system.

Table 8.1 – Unclassified Costs estimate

Extension	Pipe Diameter	Length (m)	Cost (CAD \$)
Glencolin Line Extension	NPS 4	3200	213,800
Wilson Line Extension	NPS 3	500	34,800
Ostrander Road Loop	NPS 3	4060	207,900
Total	-	-	456,500

a) Have the recommended projects been completed. If so please provide when (in-service) and at what cost. If not please explain why not.

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