



Enbridge Gas Inc.
50 Keil Drive North
Chatham, Ontario, Canada
N7M 5M1

September 9, 2019

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Enbridge Gas Inc.
Application for Certificates of Public Convenience and Necessity
Municipality of Thames Centre and the Municipality of Central Elgin
OEB File Number: EB-2019-0195**

In accordance with Procedural Order No. 1, please find attached Enbridge Gas' responses to OEB Staff's interrogatories on the above application.

Should you have any questions on this submission, please do not hesitate to contact me.

Yours truly,

[Original Signed By]

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Encl.

c.c. (email only): Penny Garnsworthy, EPCOR Utilities Inc.
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ENBRIDGE GAS INC.

Answer to Interrogatory from
Board Staff

Reference: Application, pp. 2-3

Preamble:

Enbridge Gas Inc. (Enbridge Gas) has identified within the Municipality of Thames Centre and the Municipality of Central Elgin, five of the most immediate requests for service extensions for the following areas (the subdivisions):

- Boardwalk at Millpond Subdivision
- Rosewood Subdivision
- Foxborough Subdivision
- Hawthorne Park Subdivision
- Kokomo Beach Club Subdivision

Questions:

- (a) Please confirm, for each of the subdivisions, that none of the proposed service extensions will be located within areas currently covered under Certificates of Public Convenience and Necessity (CPCN) held by EPCOR Natural Gas Limited Partnership.
- (b) Please provide the specific lots and concessions in the Municipality of Thames Centre and the Municipality of Central Elgin that each of the subdivisions will be located in.
- (c) As the requested amendments to the CPCNs for the Municipality of Thames Centre and the Municipality of Central Elgin have not yet been issued, pending a final decision in the EB-2017-0108 proceeding, please confirm that no construction has been initiated to construct the facilities to service the subdivisions. If construction has been initiated, please outline what has been completed.
- (d) For each of the subdivisions, please provide details regarding the anticipated total length of pipeline required, type of pipeline, volumetric throughput, operating pressure of the pipeline, and estimated project cost. Further, please outline if Enbridge Gas will need to file a leave to construct application for the construction of the pipelines to service any of the subdivisions. Will a system expansion surcharge be required for constructing the pipeline to service any of the subdivisions?
- (e) Please provide details of the approvals that have been obtained, as well as any additional approvals that will be required for the construction and operation of the proposed pipelines for each of the subdivisions.

Response:

- (a) Confirmed.
- (b) The table below identifies the lots and concessions for the 5 proposed subdivisions.

Subdivision	Lot/Concession
Boardwalk at Millpond Subdivision	Concession B SRT, Lots 18&19, North Dorchester
Rosewood Subdivision	Concession 3, Lot 15, West Nissouri
Foxborough Subdivision	Concession 3, Lot 15, West Nissouri
Hawthorne Park Subdivision	Concession B SRT, Lot 17, North Dorchester
Kokomo Beach Club Subdivision	Lot 15, Range 1, North of Lake Rd, Southwold Lot 15, Range 1, South of Lake Rd, Southwold

- (c) Enbridge has not initiated any construction on the proposed service extensions.
- (d) The table below provides the requested details for each of the subdivisions.

	Boardwalk at Millpond Subdivision	Rosewood Subdivision	Foxborough Subdivision	Hawthorne Park Subdivision	Kokomo Beach Club Subdivision
Total length of pipeline required (m)	2,250	1,420	940	To be determined	630
Type of pipeline	Polyethylene				
Volumetric throughput (m ³ /yr)	182,000	114,000	70,000	To be determined	58,000
Operating pressure of the pipeline	420 kPa				
Estimated project cost	\$208,000	\$114,600	\$76,700	To be determined	\$52,600

Enbridge plans to service 4 of the subdivisions at this time. The developer for the Hawthorne Park subdivision is in the process of finalizing the conceptual plan for this development so details for providing service to this subdivision have not been finalized.

A leave to construct application is not required to service any of these subdivisions given the cost of the projects and the facilities being installed. A system expansion surcharge is not required as these projects are being completed under the EBO 188 guidelines.

- (e) For these projects, Enbridge is required to obtain a municipal approval / work permits. If the project crosses a county road, work permits are also required from the upper-tier government.

The table below provides the approvals required for each subdivision and the status of the consents.

Subdivision	Permits Required	Consent Received
Boardwalk at Millpond Subdivision	Municipality of Thames Centre	Yes
	County of Middlesex	Yes
Rosewood Subdivision	Municipality of Thames Centre	Yes
	County of Middlesex	Yes
Foxborough Subdivision	Municipality of Thames Centre	Yes
Hawthorne Park Subdivision	Municipality of Thames Centre	No ¹
	County of Middlesex	No ¹
Kokomo Beach Club Subdivision	Municipality of Central Elgin	Yes

Note:

(1) The developer is working through the conceptual plan. Before Enbridge constructs this project, we will apply for the applicable permits and ensure consent is received prior to construction.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Board Staff

Reference: Application Cover Letter, p. 1

Preamble:

On page 1 of the application cover letter, Enbridge Gas states:

...Enbridge Gas has continued to receive requests for service. This application addresses five of the most urgent requests for service extensions within the Municipality of Thames Centre and the Municipality of Central Elgin in which Enbridge Gas' CPCN rights are being limited to where existing infrastructure is in place.

-and-

Enbridge Gas made significant investments in the Municipality of Thames Centre several years ago to upgrade the pressure regulating station and install a sufficiently sized plastic main for future growth in the area on the understanding that Enbridge Gas would be permitted to attach additional customers in accordance with its existing CPCN rights in the municipality. The OEB's determination on this application and its determination of how to amend the CPCN boundaries within the EB-2017-0108 proceeding will influence Enbridge Gas' utilization of existing investments and any decisions to pursue similar long-term investments in other municipalities that may be subject to uncertainty of CPCN rights.

Questions:

- (a) Please identify the anticipated growth in customer numbers for natural gas service in each of the Municipality of Thames Centre and the Municipality of Central Elgin.
- (b) Please identify the other requests for service extensions within the Municipality of Thames Centre and the Municipality of Central Elgin that Enbridge Gas has received. Further, please outline if/when Enbridge Gas would anticipate applying to the Ontario Energy Board (OEB) to have the respective CPCNs amended to include these additional requests.
- (c) Please elaborate and provide context on how the OEB's decision in this application will influence Enbridge Gas' utilization of existing investments and decisions to pursue similar long-term investment.

Response:

- (a) The customer forecast developed for revenue calculation purposes is based on a top down analysis that doesn't go down to the municipal level. While the first phase of the proposed subdivisions will add 183 customers in Thames Centre and 29 customers in Central Elgin, that is the only detail currently available for the anticipated growth of customers in these municipalities.

- (b) Enbridge Gas continuously responds to customers requesting feasibility estimates to extend natural gas service to their locations (e.g., recent requests to extend service on Cromarty Drive and Dorchester Road in Thames Centre). At this time, Enbridge Gas does not have active projects for service extensions within the Municipality of Thames Centre and the Municipality of Central Elgin other than those associated with the 5 subdivisions identified in this application. We receive requests throughout all areas within the Municipality of Thames Centre and the Municipality of Central Elgin.

- (c) Enbridge Gas completes long-term plans which include the reviewing of draft plans of subdivisions and potential growth of our existing systems to ensure we have adequate facilities to service our customers. If Enbridge Gas does not have certainty over its CPCN rights or requires regular applications to extend or confirm its CPCN rights, long-term infrastructure planning will be more difficult to complete.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Board Staff

Reference: Application, p. 2

Preamble:

On page 2 of the application, dated July 30, 2019, Enbridge Gas states the following with regard to the Boardwalk at Millpond Subdivision:

Enbridge Gas operates a gas main line in immediate proximity to the subdivision development and can easily make connections to this subdivision within the requested timeline as long as a decision approving CPCN rights in this area is issued in a timely manner. A delay to providing gas service by September 1, 2019 will result in a delay to the start of home construction and a significant adverse impact on the developer's ability to follow through on their commitments to the builders and, in turn, to home buyers.

Questions:

- (a) How quickly can Enbridge Gas provide service to the Boardwalk at Millpond Subdivision following an OEB decision on the application?
- (b) What will Enbridge Gas do to mitigate any impact(s) on the developers, builders and customers as a result of a delay in providing gas service?

Response:

- (a) Enbridge Gas is prepared to begin construction 4 weeks after the Ontario Energy Board issues its approval for this project. Enbridge Gas has the necessary materials and a contractor available to execute on this project.
- (b) Enbridge Gas has been in communication with the developer to ensure that we meet their timelines. We will work with our installation contractor to meet these timelines provided a timely decision from the Ontario Energy Board.