

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B, and in particular, sections 90(1) and 97 thereof;

**AND IN THE MATTER OF** an Application by Enbridge Gas Inc. for an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in the City of Hamilton;

**AND IN THE MATTER OF** an Application by Enbridge Ga Inc. for an Order or Orders approving the proposed form of Pipeline Easement and form of Temporary Land Use Agreement.

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**INTERROGATORIES**

**OF THE**

**BUILDING OWNERS AND MANAGERS ASSOCIATION ("BOMA")**

**March 30, 2020**

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## **Issue 1 - Need**

### **Interrogatory BOMA-1**

*Ref: Exhibit A, Tab 2, Page 1*

What will be the impact of not having a Board decision in this matter by April 30, 2020?

### **Interrogatory BOMA-2**

*Ref: Exhibit A, Tab 3: Page 2, Line 22 to Page 3, Line 4*

- (a) Why was surplus Dawn Parkway System capacity contracted to serve ex-franchise demands from 2018-2020 instead of further serving the needs of in-franchise customers in the EGD rate zone and Union rate zones commencing in the winter of 2021/2022?

### **Interrogatory BOMA-3**

*Ref: Exhibit A, Tab 5, Page 2*

- (a) Given the current COVID-19 pandemic, can the conclusions of the 2019 ICF Report be relied upon, specifically:
  - (i) Given the current COVID-19 pandemic, do the new facilities proposed by Enbridge still respond to market needs?
  - (ii) Given the current COVID-19 pandemic, are the new facilities proposed by Enbridge still expected to remain fully contracted?
  - (iii) Given the current COVID-19 pandemic, is a reassessment of the market, regulatory risk and opportunities for the Dawn Parkway System required prior to proceeding with this Application?

### **Interrogatory BOMA-5**

*Ref: Exhibit A, Tab 5, Attachment 1, Page 42 of 43*

- (a) The 2019 ICF report is dated July 2019. Even prior to the COVID-19 pandemic, public awareness of climate change concerns have increased since the 2019 UN Climate Change Action Summit on September 23, 2019. Is ICF's conclusion that despite climate change policy, the lack of new pipeline development in New York and New England still expected to ensure that existing pipeline capacity will continue to be highly valued and utilized, particularly during peak periods, through 2040?
- (b) Does the COVID-19 impact the conclusion referenced in (a) above?

## **Interrogatory BOMA-6**

*Ref: Exhibit A, Tab 6, Pages 19 and 20*

- (a) Please provide details regarding the notice of intent to turn back approximately 89 TJ/d of Dawn to Parkway capacity effective March 31, 2021.
- (b) Has Enbridge Gas been notified of further turn back of Dawn to Parkway capacity? If so, please provide details.
- (c) Given the assumed increase in public awareness of climate change concerns since September 23, 2019, coupled with the current COVID-19 pandemic, does Enbridge Gas still believe that there are future Dawn Parkway System growth opportunities and limited risk of capacity turn back?

## **Interrogatory BOMA-7**

*Ref: Exhibit A, Tab 7, Page 16 of 28*

- (a) How will the final forecasted shortfalls for winter 2021/2022 of 28,602 GJ/d and for winter 2022/2023 of 72,624 GJ/d be addressed?

## **Issue 3 – Non-Build Alternatives**

## **Interrogatory BOMA-8**

*Ref: Exhibit A, Tab 7, Pages 20 to 22*

- (a) Please provide the calculations that support the conclusions that support the rejection of Parkway Delivery Obligations, Utilizing Third-Party Deliveries at Parkway and Winter Peaking Transport Services as appropriate alternatives.

## **Interrogatory BOMA-9**

*Ref: Exhibit A, Tab 7, Pages 23 to 25*

Preamble:

*Enbridge states at page 25: “Given the need to evaluate the impacts of the IRPA, the program would need to be completed or demonstrating measurable results, at least three years prior to the date at which the additional capacity provided by the infrastructure project was initially projected to be required. Hence, a successful IRPA would need to be approved and put into motion no less than four years prior to the expected in-service date of the preferred facility alternative.”*

- (a) Why would Enbridge require three years of measurable results from DSM measures, which are suggested as alternatives to all or part of the pipeline, prior to the in-service date of the pipeline? Does Enbridge not agree that the maturity of DSM practices and the DSM industry in Ontario, and the resulting persistence of

measured savings from DSM following the first year of savings, all of which have been demonstrated in Ontario, mean that one year's measured savings should be sufficient?

- (b) Why did Enbridge not investigate specific DSM measures, tailored to the market to be served by the proposed pipeline, that would reduce demand/capacity in that market, and thereby offset some of the need for the proposed pipeline?