

VIA E-MAIL

March 31, 2020

Ontario Energy Board

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

RE: EB-2019-0172– EGI Windsor Line Repl. – FRPO Provision of Supplemental Evidence

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in service to Board in providing some of the evidence that we concluded in our final submissions was missing from the record in the above subject proceeding.

Background

Throughout the course of the proceeding, FRPO strived to get information in support of EGI’s proposed sizing of NPS 6 for the Windsor Line’s eastern leg between Comber and Port Alma. It was only during preparation of final argument did we realize that a key omission contributing to the lack of fulsome information was the pipe network surrounding Port Alma. Further, in spite of multiple requests for greater specificity on the location of customer inquiries for service impacting the line sizing, all we were provided was in the Port Alma area.

As a result, notwithstanding EGI’s assertion of FRPO’s position in its Reply Argument¹, we urged “the Board not to approve the application as presented until the applicant can provide more compelling evidence”.² However, in the alternative, we encouraged the Board to defer determination until discovery in EB-2019-0194 was completed³. In the interests of the Board when resources are constrained, we are providing the additional discovery requested in 2020 rates proceeding which we view as materially different from responses provided in the Windsor Line proceeding.

Interconnecting Pipelines

At the outset of the Windsor Line proceeding, we attempted to get an understanding of the piping network connected to the Windsor Line (provided in Attachment 1). Believing the representations provided in Exhibit I.FRPO.6 and Exhibit I.FRPO.7, we began asking questions through the Technical Conference focusing on the surplus capacity at the dead end at Port Alma. However, in recognizing the evidentiary omissions in preparing of final submissions, we requested additional information in the Rates Proceeding. Included with the response to our inquiry is EB-2019-0194 Exhibit I. FRPO. 25, Attachment 1 which shows the full extent of piping connected to the Windsor Line at Port Alma.

¹EGI_ReplySubmission_20200224, page 5, paragraph 16.

² FRPO_ARG_WDSR_20200210, page 9, Conclusion

³ Ibid.

Location of Customer Inquiries

While the potential for large volume inquiries east of Comber were not in the pre-filed evidence nor interrogatories, the existence of these inquiries arose during the Technical Conference prompting the requested undertaking JT1.15⁴ (included in Attachment 1). Given the lack of specificity regarding these inquiries along the Windsor Line east of Comber, we asked further questions in the Rates proceeding. The responses are also part of EB-2019-0194 Exhibit I. FRPO. 25.

What is now clear is that these customer inquiries are not on or proximate to the Windsor Line. Putting this answer together with a better understanding of the pipe network that surrounds Port Alma, we realize that this network could be instrumental in serving these inquiries. As it is now apparent, the only customer that proceeded, Customer B, is served from the Leamington Line. We and more importantly the Board are also precluded from understanding how that pipe network may be available to serve future loads from these or other customers as the existence of network was not evidenced in the Windsor Line proceeding.

Conclusion

We believe that having provided the Board an alternative in our final submissions in the Windsor Line proceeding, it was important to ensure that the subject interrogatory responses came to the attention of the Panel. We did so out of the abundance of caution due to the fact that there was no clear regulatory mechanism to bring this pertinent information into the Windsor Line proceeding. In a worst-case scenario, the Panel in the Windsor Line proceeding could have relied on the misapprehension, that we shared, that these potential customers were on or proximate to the Windsor Line with no other source of gas available. Out of respect for the Board and the constrained resources in this period, we would not want to bring a motion after the fact if this misapprehension were relied upon in the decision. We trust that this communication is of assistance to the Board.

Respectfully Submitted on Behalf of FRPO,



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

Attachment 1

⁴ TC1 Transcript, Dec. 5, 2019, pg. 48-50, Exhibit JT1.15

EB-2019-0172

WINDSOR LINE REPLACEMENT

FRPO SUBMISSION

MARCH 31, 2020

ATTACHMENT 1

CONTENTS:

- 1) EB-2019-0172 Exhibit 1.FRPO. 6 and EB-2019-0172 Exhibit 1.FRPO. 7
- 2) EB-2019-0172 Exhibit JT1.15
- 3) EB-2019-0194 Exhibit I.FRPO.25 including Attachment 1

ENBRIDGE GAS INC.
Answer to Interrogatory from
Federation of Rental-housing Providers of Ontario (FRPO)

Reference: Exhibit C / Tab 1 / Sch. 1 / pg. 1

Question:

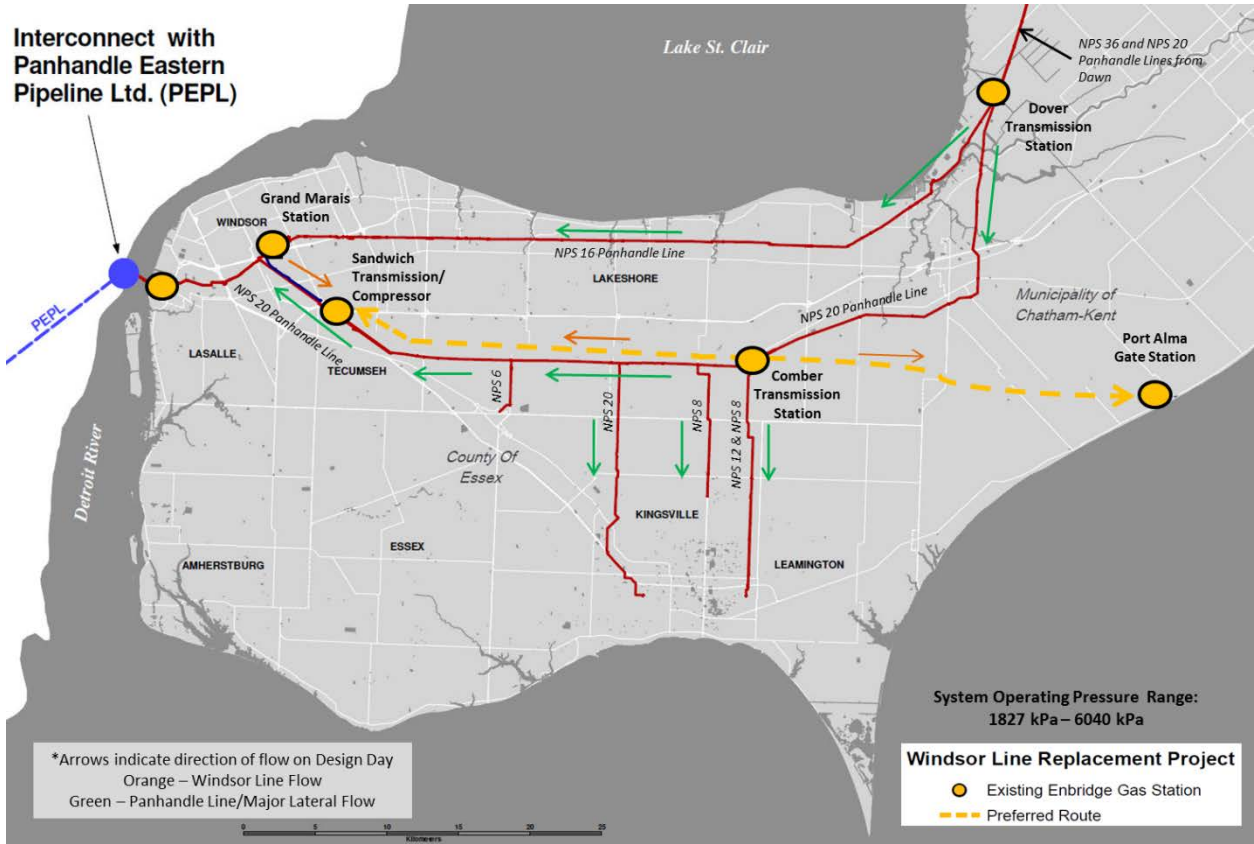
Preamble: We would like to understand better the pipeline network that supplies the area.

Please re-create this map showing all surrounding and interconnected pipelines.

- a) Please provide the size, Maximum and Minimum operating pressures and flow direction of those lines.
-

Response:

- a) Please see Attachment 1. This diagram includes the Panhandle lines and major laterals interconnected with the Windsor Line.



ENBRIDGE GAS INC.
Answer to Interrogatory from
Federation of Rental-housing Providers of Ontario (FRPO)

Reference: Exhibit C / Tab 2 / Sch. 1 / pg. 1

Question:

7) Provide the other pipelines, sizes, locations, directions of flow and MOP's including non-Enbridge pipelines. Please show the design day forecasted pressures upstream and downstream of inter-connects between pipelines for the winter of 2019/20.

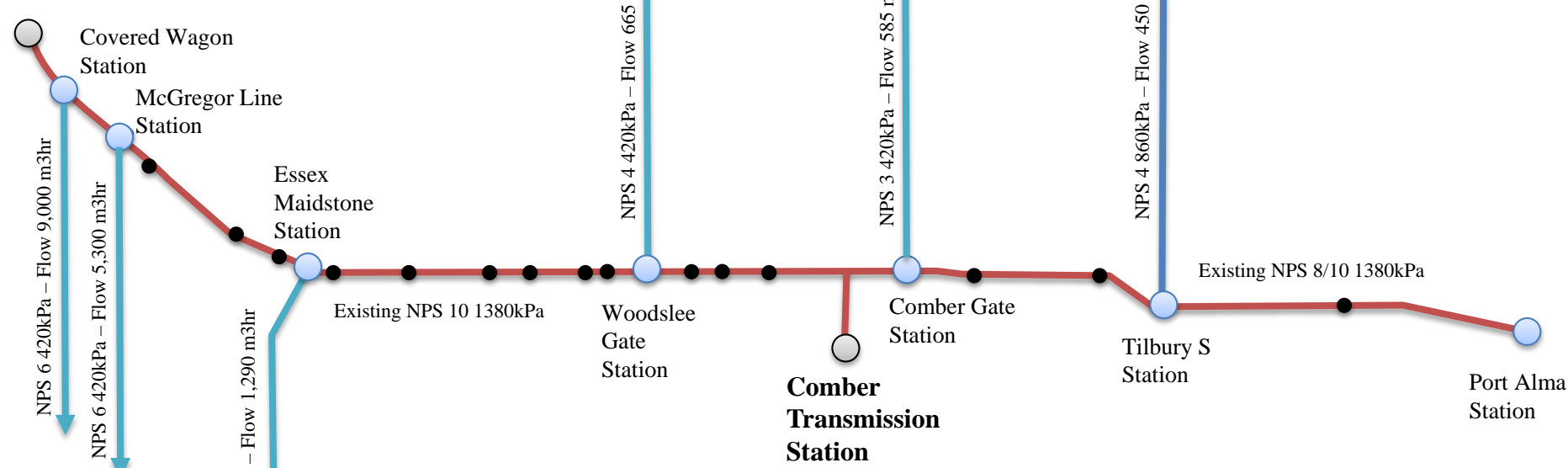
Response:

Please see Attachment 1 for an updated version of the schematic filed at Exhibit C, Tab 2, Schedule 1, page 1 showing the system operation during winter 2019/2020. The schematic has been created to display other pipelines, sizes, locations, directions of flow and MOPs. The schematic also shows additional details only for the large distribution networks. To protect the confidentiality of large customers served from smaller distribution stations, flows and pressures associated with these stations have not been included. Note this schematic represents a snapshot in time and will vary as the network demands change over time.

WINDSOR LINE – WINTER 2019/2020 SYSTEM OVERVIEW



Grand Marais Station



Station	Design Day Forecasted Upstream Pressure (kPa)	Design Day Forecasted Downstream Pressure (kPa)
Covered Wagon Station	1,000	380
McGregor Line Station	1,080	380
Essex Maidstone Station	1,130	380
Woodslee Gate Station	1,220	310
Comber Gate Station	1,295	275
Tilbury South Station	1,290	810

- Transmission Station
- Large Distribution Station
- Small Distribution Station

ENBRIDGE GAS INC.

Undertaking Response to FRPO

To provide data on all customer demand east of Comber in the last two years, including customer(s)' distance east of the T in the intersection north of the Comber transmission station, and redacted as appropriate.

Response:

Enbridge Gas received unforecasted inquiries east of Comber, but not directly on the Windsor Line being replaced. Enbridge Gas received four inquiries in the Port Alma and surrounding area for firm demands of 2,600 m³/hour, 2,250 m³/hour, 1,800 m³/hour and 1,350 m³/hour. The Windsor Line would be able to feed similar customer requests in the future as they are in the area supplied by the Windsor Line through Port Alma. The approximate distance to the Port Alma Station from Comber Transmission Station is 32.2 km. The unforecasted loads have been identified to provide an idea of the type of inquiries Enbridge Gas has received in the area that are not included in the forecast filed at Exhibit C, Tab 3, Schedule 1, Appendix 2. The unforecasted loads reiterate the importance of requiring flexibility in the design of the pipeline (i.e. NPS 6) in order to meet the unforecasted demands of potential customers.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Federation of Rental-housing Providers of Ontario ("FRPO")

Interrogatory

Reference:

Exhibit B, Tab 2, Schedule 1, pages 20 & 23-27 & EB-2019-0172 References contained in the footnotes below

Preamble:

We want to understand better specifics around additional utilization of the eastern half of the proposed Windsor Line replacement in support of the proposed NPS 6 sizing. From the Leave to Construct proceeding¹:

When questioned about the need for the enormous levels of surplus capacity, the witnesses provided that there were additional potential customers east of Comber that were not included². We requested that the potential load additions be provided (respecting confidentiality) including the distance east of the T in the intersection north of the Comber Transmission station³. What was provided was that there for "four inquiries in the Port Alma and surrounding area"⁴. However, it is disconcerting that the distance from the T in the intersection was not provided. This distance could be provided without any risk to confidentiality. Further, it is very surprising that in the Project Charter approved only a year ahead of this application, in the Key Commercial Drivers Section, while growth benefits are identified for other areas, there is no mention of industrial inquiries in the Port Alma area⁵. We believe these potential load additions require additional scrutiny to establish the appropriate sizing of the pipe.

1 FRPO_REQ ORAL HEARING_20200104

2 TC1 Transcript, Dec. 5, 2019, pg. 48-49

3 TC1 Transcript, Dec. 5, 2019, pg. 51

4 Exhibit JT1.15

5 Exhibit JT1.17, Attachment 2, page 7

Question:

Please provide specifics on the customer inquiries for those requested load additions east of the T in the Windsor line north of Comber.

- a) Please provide specific emails, service lateral requests, or other documentation in support of assertions of additional interest. Please ensure that the inquiries are differentiated by some notation such as, Customer A, Customer B, etc. to distinguish individual inquiries from multiple inquiries from the same customer
 - i. For each of the individual inquiry, please provide the distance from the T in the Windsor Line north of the Comber Station.
 - ii. Please provide the hourly load associated with the individual inquiry.
- b) Have any inquiries been attached to the system?
 - i. If so, what hourly load was applied for?
 1. Using that load, what is the remaining surplus capacity at Port Alma using the criteria analyzed and reported in EB-2019-0172 Ex. KT1.2?
- c) Are any inquiries in active process with a scheduled installation in 2020?
 - i. If so, what hourly load was applied for?
 1. Using that load, in addition to what was added in b), what is the remaining surplus capacity at Port Alma using the criteria analyzed and reported in EB-2019-0172 Ex. KT1.2?
- d) Was any aid-to-construction calculated for any of the load inquiries?
- e) What would the revenue requirement impact be for each of those potential customers?
 - i. How did or does it affect the ICM request by the company?

Response

The requested information in part a) to d) is not relevant to the relief being sought in this proceeding. However, to the extent the information can provide further clarity to the Board, a response is provided below.

a) An overview of the distribution lines in the Port Alma area and the customer inquiries (redacted) can be found in the following attachments:

- Attachment 1: Port Alma Station
- Attachment 2: Customer A inquiry
- Attachment 3: Customer B inquiry
- Attachment 4: Customer C inquiry
- Attachment 5: Customer D inquiry
- Attachment 6: Customer E inquiry

The customer inquiries were east of Comber, and not directly on the Windsor Line. The customer inquiries illustrate the demand that Enbridge Gas has been receiving since the FBP. The inquiries predominantly stem from greenhouses and Enbridge Gas anticipates it will continue to receive requests from similar customers in the future. These requests are on pipelines in the area surrounding Port Alma Station that can be supported by the Windsor Line as shown in the diagram in Attachment 1. The approximate distances of each customer A through E from Port Alma Station are 23 km, 8 km, 2.3 km, 2.2 km and 8.4 km.

b) Yes, one of the four inquiries (Customer B) proceeded in 2019.

i) 2600 m³/hr

- 1) The surplus capacity of the Windsor Line did not change as this load already proceeded before the analysis in EB-2019-0172, Exhibit KT1.2, and was reserved on the existing Leamington Line that did not require flow support from the Windsor Line through Port Alma Station for attachment. The consequence of adding this load restricts the capacity of the surrounding pipelines (as shown in Attachment 1) and impairs the ability to serve the types of greenhouse customer requests that Enbridge Gas has been receiving.

c) The remaining three other inquiries (Customers A,C and D) are not scheduled for installation in 2020 at this time. Also an additional inquiry by a single customer (Customer E) was requested in 2020 to the south of Port Alma (along the Leamington Line). Although there is no guarantee all unforecasted loads will proceed, the greenhouse requests are indicative of the type/size of requests Enbridge Gas is receiving in the Port Alma area. The NPS 6 design for the Windsor Line will help support these potential customers and minimize the potential for local reinforcement of the surrounding pipelines.

i) 2,750 m³/hr (Customer E)

1. A large load of 2,750 m³/hr to the system south of Port Alma would currently cause reinforcement without the Windsor Line replacement at the 3450 kPa MOP. With the Windsor Line replacement, additional pressure and flow through Port Alma station would currently remove reinforcement for this customer. If the NPS 4 option is installed east of Comber Transmission, approximately half the surplus capacity on the Windsor Line would be removed at Port Alma with this load addition. If the recommended option of NPS 6 is installed, several additional large customers can likely be attached and supported by the Windsor Line and flow through the Port Alma Station without significant reinforcement downstream. In other words, the other pipelines in the area cannot readily support large customers any further at this time without reinforcement, and the Windsor Line replacement will support growth in the area through Port Alma Station.

Knowing that the Windsor Line must be replaced due to the Integrity concerns and the age of the pipeline, it is both efficient and prudent to maintain the existing capacity of the Windsor Line to support unforecasted growth in the Port Alma area and defer potential reinforcements that may be required due to unforecasted growth.

It is important to note that the total loads of all inquiries requested in this area would not be able to be supported by the Windsor Line through Port Alma Station if NPS 4 option is installed east of Comber Transmission Station. This is an example of the sizes and amount of requests that are unforecasted in the area and will likely be requested ongoing in the future showing the need for the NPS 6 pipeline.

- d) Customer B did not require aid-to construct as the existing system had adequate capacity. The remaining inquiries are under assessment and any aid-to-construct will be determined as Enbridge moves through the load attachment process.
- e) There is no revenue requirement impact resulting from any potential customers.
 - i) There is no impact on the ICM request.

PORT ALMA STATION – OVERVIEW

