

April 2, 2020

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

EB-2019-0159 - Enbridge Gas Inc. – Leave to Construct Application - Hamilton

Please find, attached, interrogatories on behalf of the Consumers Council of Canada for Enbridge Gas Inc. pursuant to the above-referenced proceeding.

Please feel free to contact me if you have questions.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: EGI, Regulatory Affairs
All Parties

INTERROGATORIES FOR ENBRIDGE GAS INC.

FROM THE CONSUMERS COUNCIL OF CANADA

RE: EB-2019-0159 – LEAVE TO CONSTRUCT APPLICATION

DAWN PARKWAY EXPANSION

Ex. A/T3/p. 5

The evidence states that the Project will be completed in accordance with all relevant regulations and safety standards in time to serve contracts beginning November 1, 2021. In order to meet that timeline EGI is requesting an OEB Decision on the Application no later than April 30, 2020. Given that an OEB Decision will be much later than April 30, 2020 what are the implications of a later approval date? Is November 1, 2021 still the expected in-service date?

Ex. A/T3/p. 5

The evidence states that ICF supported EGI's Project as set out in its 2019 ICF Report. Was the ICF work subject to an RFP Process? If not, why not? Please provide the Terms of Reference for the ICF work. Has ICF provided any updates to its Report? If so, please provide those updates. Is EGI aware of any other more recent ICF Reports regarding the North American natural gas supply and transportation dynamics? If so, please file those reports.

Ex. A/T3/p. 6

Please provide the detailed calculations underpinning the bill impacts (e.g. \$1.50/year for residential customers).

Ex. A/T3/p. 7

EGI has implemented a stakeholder outreach program with respect to the Project which included: (i) meeting with affected stakeholders (ii) holding public information sessions in the Project area; and (iii) mailing a letter summarizing the Project to affected stakeholders. In addition, the evidence states that EGI will continue public consultation throughout the construction of the Project, until complete:

- a) Please provide details regarding the meetings with stakeholders and the public information sessions;
- b) Please set out details regarding how EGI will continue its public consultation; and
- c) Hundreds of comments from stakeholders opposed to the Project have been filed with the OEB and can be found in the web drawer. How does EGI plan

to address this input? How is this consistent with the evidence which states that EGI has not identified any strong opposition to the Project?

Ex. A/T6/p. 1

The evidence states that growing demand for natural gas in Ontario and a desire by U.S. Northeast customers to increase access to the liquid market, diverse natural gas supplies and strategic storage facilities at the Dawn Hub is driving the need to construct the Project. Please indicate to what extent the current significant downturn in the North American economy could impact demand and the need for the Project.

Ex. A/T6/p. 18

The evidence states that based on current market inquiries EGI expects that there will be incremental in-franchise and ex-franchise demand for the Dawn Parkway System capacity in the future, possibly as early as 2022/2023. Please provide the basis for this expectation. To what extent is the need for the Project driven by this increased demand?

Ex. A/T7/p. 19

The evidence sets out 5 non-facility alternatives to constructing the proposed Project. Is this a complete list of the alternatives considered? Did EGI retain an independent assessment of these alternatives? If not, why not? If so, please provide copies of that analysis.

Ex. A/T7/p. 26

EGI considered a number of facility alternatives to constructing the proposed Project. Did EGI retain an independent assessment of these alternatives? If not, why not? If so, please provide copies of that analysis.

Ex. A/T8/S1/p. 1

The total estimated capital costs are provided and estimated to be \$203.5 million. For each line item please provide a detailed breakdown. Please include all assumptions. Included in the budget is an amount of \$19.466 million for indirect overheads. Please provide a detailed breakdown of that amount and explain how it was derived. Please explain what the \$184.060 million represents.

Ex. A/T8/S1/p. 1

Please provide a list of the last 10 Leave to Construct Projects that the OEB has approved for EGI – including both rate zones. For each of the last 10 Leave to Construct Projects that the OEB has approved for EGI – including both rate zones please provide the forecast and approved project costs in the same format as Ex. A/T8/S1/p. 1.

One of the issues defined by the OEB for this proceeding is, “If the OEB approves the proposed Project, what conditions, if any, are appropriate”?

- a) Please provide a list of the last 10 Leave to Construct Projects that the OEB has approved for EGI – including both rate zones. For each Project please indicate whether conditions were approved by the OEB.
- b) If conditions were approved, please list the conditions attached to each of those projects.