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April 3, 2020

**VIA E-MAIL**

Ms. Christine Long  
Registrar & Board  
Secretary  
Ontario Energy Board  
P.O. Box 2319, 27th  
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EB-2019-0159—Enbridge Gas Inc. 2021 Dawn Parkway Expansion Project  
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

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

Yours truly,

*(Original Signed By)*

John Lawford  
Counsel for VECC

Copy to: Adam Stiers, Technical Manager, Regulatory Applications, Enbridge Gas Inc.

**EB-2019-0159**

**Enbridge Gas Inc. (EGI)**

**Application to construct natural gas pipeline and associated  
facilities in the City of Hamilton**

**VECC Interrogatories**

**April 3, 2020**

VECC-1

Ref: Ex A T7 P19

Preamble: The evidence states “Enbridge Gas evaluated the following non-facility alternatives to constructing the proposed Project:

- i) Parkway Delivery Obligations
  - ii) Utilizing Third-Party Deliveries at Parkway
  - iii) Winter Peaking Transport Service
  - iv) Integrated Resource Planning.”
- a) Please provide the date when the need for the project was first established.
  - b) Please provide the date Enbridge began and concluded its evaluation of Integrated Resource Planning as a non-facility alternative to constructing the proposed Project.
  - c) Please provide the scope of work for the evaluation of Integrated Resource Planning as an alternative to the proposed project.
  - d) Please provide the detailed analysis and final report or equivalent documentation that was produced as part of Enbridge Gas’ evaluation of Integrated Resource Planning as a non-facility alternative to constructing the proposed Project.
  - e) Please advise of the status of formally integrating Enbridge Gas’ DSM and Infrastructure planning processes.
  - f) On what date was the project approved internally?
  - g) If the OEB did not approve the application, what Integrated Resource Planning options would Enbridge Gas pursue to meet the shortfall?

VECC-2

Ref: Ex A T7 P25

Preamble: The evidence states “Further, as set out at Exhibit A, Tab 13, the cost of IRPAs compared to the proposed Project, are uneconomic. Based on these considerations, IRPAs are not viable alternatives

to the construction of the proposed Project, though it is possible that they may be effective at reducing peak period demands sufficiently in the future to defer or avoid facility expansion/reinforcement projects.

- a) Why does Enbridge Gas believe it is possible that IRPAs may be effective at reducing peak period demands sufficiently in the future to defer or avoid facility expansion/reinforcement projects?
- b) If the OEB did not approve the application, what Integrated Resource Planning options would Enbridge Gas pursue to meet the shortfall?

VECC-3

Ref: Ex A T7 P26-27

Preamble: Enbridge's evidence includes a description of the facility alternatives it considered for a November 1, 2021 in-service date resulting in a ranking of five alternatives including the proposed project which is the Kirkwall to Hamilton Pipeline (NPS 48).

- a) Please advise if, when and how the project was updated to reflect material changes in underlying assumptions.
- b) Please discuss if Enbridge undertook an analysis of pipe size options for the proposed facilities. If not, why not? If yes, please provide this analysis to support a NPS of 48 inches.
- c) Please discuss how the proposed facilities and four next best alternatives analysis is impacted by i) a later in-service date and ii) a decrease in additional capacity required.

VECC-4

Ex A T8 P1

Preamble: The evidence states "The total estimated cost of the Project is \$203.5 million. This cost includes: (i) materials; (ii) construction and labour; (iii) environmental protection measures; (iv) land acquisitions; (v) contingencies; (vi) interest during construction; and (vii) indirect overheads.

Please provide a project cost breakdown on this basis.

VECC-5

Ref: Ex A T9 P4

Preamble: The evidence states "Pipe will need to be ordered in 2020 to meet the in-service date of fall 2021. Enbridge Gas anticipates no issues obtaining material for the pipeline component of the Project within the proposed timelines. Enbridge Gas also anticipates no issues in obtaining a contractor to complete construction."

In light of the recent developments related to COVID-19 and market trends, please discuss if Enbridge

Gas foresees any delays in obtaining materials or a contractor to complete construction. If yes, please discuss.

VECC-6

Ref: Ex A T9 P6

Preamble: The evidence states “All necessary permits, approvals and authorizations will be obtained by Enbridge Gas at the earliest appropriate opportunity. Enbridge Gas expects to receive all required approvals prior to commencing construction of the Project. Enbridge Gas will assign inspection staff to ensure that contractual obligations between Enbridge Gas and the pipeline contractor, provincial ministries, municipal government and landowners are complied with.

- a) Please discuss how COVID-19 impacts Enbridge Gas’ ability to obtain all necessary permits, approvals and authorizations within the original timeframe.
- b) Please estimate the impact on the forecast project schedule and project cost as a result of part (a).

VECC-7

Ref: Ex A T9 Schedule 1

- a) Please provide the version date of the project schedule provided at Ex A T9 Schedule 1.
- b) Please provide an updated project schedule resulting from responding to interrogatories.

VECC-8

Ref: Ex A T9 Schedule 1

The Project is within Class 1, 2 and 3 locations. Considering future potential development along the route, the Project is designed to meet Class 2 and 3 location requirements.

- a) Please provide the percentage of the project originally within Class 1 locations.
- b) Please provide the cost differential between Class 1, Class 2 and Class 3 design pipeline.
- c) Please explain the future potential development along the route.

VECC-9

Ref: Ex A T13 P11 Table 13-1

Preamble: Table 13-1 describes project attributes and eligibility supporting the relevance of IRPAs.

Please explain the basis of the eligibility requirement of each project attribute in Table 13-1.

VECC-10

Ref: Ex A T10 P2

Preamble: The evidence states “To inform and solicit input from landowners, tenants and the general public with respect to the Project, public information sessions were held as follows:

- February 27, 2019 – in Carlisle, Ontario; and
- May 9, 2019 – in Valens, Ontario.

The purpose of the information sessions was to provide the general public an opportunity to: (i) view specifics of the Project; and (ii) ask questions and comment on the Project, the preferred route and the overall planning process.

- a) Please provide the number of attendees at each session and summarize the nature of their interest.
- b) Please discuss if Enbridge’s Integrated Resource Planning Proposal was presented at either of these meetings as part of the overall planning process discussion.

VECC-11

Ref: Ex A T3 P7

Preamble: As of the date of this filing, Enbridge Gas has acquired approximately 75% of the land rights required for permanent easement associated with the Project and has not identified any strong opposition to the Project.

Please update the above to reflect the current status.

VECC-12

Ref: EB-2018-0097 Bathurst Reinforcement Project

Preamble: On March 11, 2020, EGI filed its Bathurst Reinforcement Project Post Construction Interim Monitoring Report.

Please advise if there are any lessons learned from the Construction Effects and Mitigation Measures and Landowner Comments and Complaints from the Bathurst Reinforcement Project that can be applied to the Hamilton Leave to Construct Project (EB-2019-0159).