

Ms. Christine Long
Registrar & Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

May 26, 2020

**Re: EB-2019-0294 Low Carbon Energy Project
Pollution Probe Interrogatories**

Dear Ms. Long:

Please find enclosed Pollution Probe's Interrogatories for Enbridge on the above noted proceeding.

Respectfully submitted on behalf of Pollution Probe.



Michael Brophy, P.Eng., M.Eng., MBA
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Consultant to Pollution Probe
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cc: Enbridge (email via EGIRegulatoryProceedings@enbridge.com)
David Stevens, Aird & Berlis (via email)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

Enbridge Low Carbon Energy Project

POLLUTION PROBE INTERROGATORIES

May 26, 2020

Submitted by: Michael Brophy
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Phone: 647-330-1217
28 Macnaughton Road
Toronto, Ontario M4G 3H4

Consultant for Pollution Probe

Below are Pollution Probe's Interrogatories to the Applicant related to the above noted proceeding.

Pollution Probe #1

Please confirm that the evidence Enbridge filed March 31, 2020 entitled " EGI_APPL_REDACTED_v2_LTC_Markham_LCE_20200331" replaces the evidence filed December 20, 2019 entitled " EGI_APPL_REDACTED_LTC_Markham_Low Carbon Energy_20191220".

Pollution Probe #2

[Ex .A, T2, S1]

- a) Please explain why Enbridge selected the proposed boundaries for the blended gas area (BGA) and how they relate to the other potential "loops".

Pollution Probe #3

[Ex. A, T2, S1]

- a) Please provide an explanation of the (chemical) combustion process that results in hydrogen enriched natural gas having a low heating value.
- b) Please explain why a slight volumetric increase is required for customers in the BGA and the incremental volume calculation assuming a 2% hydrogen level.

Pollution Probe #4

[Ex. B, T1, S1]

- a) Please provide and explain the maximum percent of hydrogen that could be safely added to the natural gas distribution system (e.g. BGA).
- b) Please provide the calculation showing that GHG emission reductions can range from approximately 97 tons carbon dioxide equivalent (tCO₂e) to 120 tCO₂e per year due to this project.
- c) Please confirm that any additional grants or incentives (incremental to the potential SDTC grant) would go toward reducing the net capital cost of the project.

Pollution Probe #5

[Ex. B, T1, S1]

- a) Please confirm that this project is contributing to the most cost-effective path for the City of Markham (and consumers) to meet the municipal energy plan net zero by 2050 targets.
- b) Do the facilities proposed in this project provide any additional capacity, operational flexibility or other benefits?

Pollution Probe #6

[Ex. C, T1, S1, Attachment 1]

The link provided does not appear to work. Please file a copy of the Environmental Report for this project.

Pollution Probe #7

[Ex. D, T1, S1]

- a) Table 8 indicates Indirect Overheads related to this project of \$1,260,395 and it is Pollution Probe's understanding that Capital Overheads are capped for the current IR period. Is Enbridge planning to exceed its capital overheads in the current IR period by \$1,260,395 due to this project or manage within its allowed capital envelope?
- b) Please provide any updates to the project schedule in Table 7 due to COVID-19 or any other factors.

Pollution Probe #8

[Ex. D, T1, S1]

Reference: 25% contingency applied to all direct capital costs except for the station material costs which have a 40% contingency.

- a) Please provide a table of contingency percentages (OEB approved and actuals) related to direct capital cost for the past 5 completed projects where Leave to Construct was granted by the OEB.
- b) Please provide a table of forecasted and actual contingency percentages related to station material costs for the past 5 completed projects of a similar nature.
- c) Please confirm that the total project costs of \$5,232,265 are the maximum capital costs and that Enbridge will only seek to recover actual costs.