

REF: ESSEX Evidence, Tab 2, Exhibit B, page 3 of 4; Exhibit F, page 2-3 of 4; Exhibit H, page 2 of 9; Exhibit H, page 7 of 9

Preamble: ESSEX evidence provides: *“Mr. Bain expressed concern over the replacement of a pipeline, with another that would not increase the capacity for the serviced area. He referenced previous communications with Union Gas about capacity, which indicated that if the municipality intended on expanding commercial/industrial development, there would not be adequate resources available to support this. He questioned that with Essex County development expanding rapidly, why would the replacement of the pipeline not be done with a larger capacity line, to support growth.*

From our read of the Essex evidence, Council had expressed concern over the available capacity once the replacement pipe was in place (provided reference above). The evidence (some references above) provides numerous attempts by staff to understand the capacity of the replacement pipe. The response that we read is that the new pipe will have “like for like” capacity that will meet the twenty year forecast.

While our focus in the original proceeding was on the capacity on the eastern half of the replacement project, we are interested in understanding the actual capacity of the proposed pipeline for the western half of the project and the implications for Essex, ratepayers and EGI shareholders.

- 1) Please provide a map showing the entire Windsor Line and all inter-connecting pipelines (including the Sarnia, Leamington, Ridgeway Lines and any inter-connecting pipelines on the Western half, e.g. Panhandle at Sandwich Compressor, etc.).
 - a) Please provide the Maximum Operating Pressures of each of lines.
 - b) From the most recent Facilities Planning analysis, please provide the amount of flow and direction of flow from each pipeline intersection assuming
 - i) The existing Windsor Line is in place
 - ii) With the proposed Windsor Line operating at its higher operating pressure
 - (1) To be clear, if this analysis has not been done to this point, please explain why and perform the analysis to provide the requested data for pipeline flows.
- 2) For the western half of the Windsor Line, with the existing pipe in place:
 - a) What is the current load that flows from Comber west?
 - b) What amount of additional load could be added to the most westerly end of the western half while staying inside of minimum pressure parameters?
 - i) In this scenario, is the pipe fed from the Sandwich Compressor inter-connection with the Panhandle system in addition to Comber?
 - c) Would this maximum additional load be the incremental capacity of line?
 - i) If not, please provide the incremental capacity and define how it was determined.

- 3) For the western half of the Windsor Line, with the proposed pipe in place:
 - a) What is the current load that flows from Comber west or is it unchanged?
 - b) What amount of additional load could be added to the most westerly end of the western half while staying inside of minimum pressure parameters?
 - i) In this scenario, is the pipe fed from the Sandwich Compressor inter-connection with the Panhandle system in addition to Comber?
 - c) Would this maximum additional load be the incremental capacity of line?
 - i) If not, please provide the incremental capacity and define how it was determined.
- 4) What is the forecasted twenty year load for the western half of the project?
 - a) What is the forecasted load of the proposed hospital?
 - i) Is the hospital included in the twenty year load forecast?
- 5) Please file any correspondence with Essex wherein Enbridge provided actual figures on the resulting capacity of the proposed project on the western segment by comparing it to existing or future loads like the hospital.

REF: ESSEX Evidence, Tab 2, Exhibit L, page 3 of 7

Preamble: The above reference provides an email from EGI which states: *“Enbridge does understand and confirms the cost obligations upon Enbridge as per the terms of the Road Agreement, namely that any future relocation of the pipeline is to be solely paid for by Enbridge, and the possibility that a deeper depth may mitigate some of those costs.”*

We would like to understand better EGI's views on cost responsibility if the pipe would have to be relocated due to roadwork or replaced/looped for capacity.

- 6) We understand the Board would ultimately determine cost responsibility between shareholders and ratepayers but given the record in this proceeding, what is EGI's position on who would be responsible for costs associated with:
 - a) Relocation of pipe due to road-widening in the next ten years? Twenty years?
 - b) Need for replacement or looping due to:
 - i) Additional load from the hospital in the ten years? Twenty years?
 - ii) Unforeseen growth beyond the EGI forecast in the next ten years? Twenty years?
 - c) Please provide EGI's basis for its position for each of the above scenarios.

REF: ESSEX Evidence, Tab 2, Exhibit H, page 7 of 9

Preamble: The above reference provides an email from Essex to EGI which states:

“The alignment - *The letter did not address why Enbridge now requires the pipeline to be within the County's road allowance, impacting the County's corridor when there is an easement already in place for the majority of the route along CR 46. Please provide clarification and justification on why the new pipeline cannot be installed within the existing easement.*

We would like to understand the concern expressed in this request for clarification.

- 7) Was the replacement pipe originally proposed in the existing pipeline easement?
 - a) If so, what precipitated the change in proposed location?
- 8) Could the new proposed pipe not be put back in the same running line using the “lift and lay” approach that EGI promoted for some of its Panhandle Line replacement?
 - a) Could additional restraint applied before the lift allow this procedure to be completed.
 - b) Please provide detailed reasoning for the response.

REF: EGI Evidence, Exhibit A, Tab 2, Schedule 1, page 2

Preamble: The EGI evidence states: *“This Application will confirm to the Board that Enbridge Gas will install the NPS 6 steel for the entire length of the pipeline.”*

- 9) Did EGI request and receive estimates for both the entire length being installed as NPS 6 and the alternative NPS 6 for the west half and NPS 4 for the east?
 - a) If so, please file the estimates?
 - i) If EGI is not prepared due to confidentiality, please provide confidentially to the Board for consideration of intervenor appropriate access.
 - b) If not, please provide detailed reasoning for why not?

REF: EGI Evidence, Exhibit A, Tab 2, Schedule 1, page 2

Preamble: The EGI evidence states: *“Essex County has also demanded that Enbridge Gas remove approximately 21.8 kms of NPS 10 Steel main from the right-of-way rather than permitting it to be abandoned in-place. The changes demanded by Essex County will increase capital construction costs by more than \$13 million...”*

We would like to understand better the cost responsibility for these costs if realized.

10) Please explain how EGI recovers Site Restoration Costs in the Union Gas rate zone.

- a) Please provide delineation as to what those costs pay for?
- b) Please provide EGI's position on the applicability of Site Restoration Costs for the request of the Essex County.

REF: EGI Evidence, Exhibit B, Tab 1, Schedule 1, page 5

Preamble: The EGI evidence states: *“Trench excavations greater than 1.2 m requires consideration for shoring or trench sloping to protect workers from the risk of excavation collapse and workers becoming buried.”*

We would like to understand better the alternatives that EGI considered.

11) Please provide EGI views on the opportunity to lay and weld the pipe outside the trench, place the sand bedding in mechanically and lay the pipe in mechanically thus minimizing or eliminating shoring costs.

- a) Please provide an estimate of the incremental cost using this approach relative to EGI preferred base case that was planned.
- b) If EGI asserts this cannot be done, please provide the specific reason and potential alternatives with their costs to overcome this barrier.