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August 6, 2020

VIA E-MAIL

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
Toronto, ON

Dear Ms. Long:

**Re: EPCOR Natural Gas Limited Partnership (Aylmer and Southern Bruce)
2020 Annual Update – EB-2020-0106
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)**

In accordance with the Board's letter of July 6, 2020 please find attached VECC's questions on the respective EPCOR Gas Plans in the above-noted proceeding. We have directed a copy of the same to EPCOR.

Yours truly,

A handwritten signature in black ink, appearing to read 'Mark Garner', is written over a light blue horizontal line.

Mark Garner
Consultants for VECC/PIAC

Email Copy:

Vince Cooney, Senior Manager, Regulatory Affairs, EPCOR Ontario Utilities Inc.

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Kenneth Poon, Manager – Energy Supply & Procurement EPCOR Ontario Utilities Inc.

Email: kpoon@epcor.com

REQUESTOR NAME **VECC**
TO: **EPCOR Natural Gas Limited Partnership**
DATE: **August 5, 2020**
CASE NO: **EB-2020-0106**
APPLICATION NAME **Aylmer and Southern Bruce Gas Supply Plan**
 2020 Annual Update – EB-2020-0106

ENGLP Aylmer Gas Supply Plan: 2020-2024 May 24, 2020 (“Aylmer Plan”)

VECC-1

Reference: Aylmer Plan, pages 6-

- a) Is there any common ownership between ENGLP/EPCOR and Lagasco Inc.?
- b) Is its ENGLP’s intention to explore alternative distribution system reinforcements/builds to replace or augment the supply side solution to the Alymer franchise pressure issues that are currently addressed by the Lagasco Lake Erie gas contract?
- c) If not, please explain what due diligence ENGLP intends to undertake during the 5-year contract period to ensure it is able to access a supply-side solution to system pressure issues that provides security of supply at a reasonable cost over the long-term.

VECC-2

Reference: Aylmer Plan, page 9

ENGLP provided the following cost estimate for the Lakeview Reinforcement Project:

Table 3.4.2-1
Lakeview Reinforcement Project Breakdown (\$ dollars)

Description	A USoA Account	B 2019
1 Measuring and Regulating Equipment	477	\$138,000
2 Mains - Plastic (Distribution Plant)	475	\$168,000
3 Land	480	\$51,000
4 Total		\$357,000

Source: EB-2019-0336, Exhibit 2, Tab 3, Schedule 1, page 16

The project was projected to be in-service by December 31, 2019.

- a) Please update the table and provide the actual or expected in-service date.
- b) Are there any infrastructure projects that were not identified in EB-2018-0336 that will be required to take delivery of gas from Lagasco Inc.? If yes please describe these and their estimated cost(s).

VECC-3

Reference: Aylmer Plan, page 12

- a) Please explain in more detail why Enbridge Gas did not increase ENGLP's Contract Demand in 2020 to reflect the 2019 peak consumption of 241,680 m3. Specifically explain what "*system implementation*" issue prevented this update.
- b) What impact would an increase in the contract demand available to ENGLP have on the current gas plan?

VECC-4

Reference: Aylmer Plan, page 16, Tables 3-1 and 3-2

- a) Please provide a table which shows the annual average demand by customer class.
- b) Please clarify the units of measurement in Table 3-2.

VECC-5

Reference: Aylmer Plan, page 19,

The following statement is found at page 19:

" Currently, approximately 1.% of ENGLP customers are on direct purchase compared to system sales and represent approximately 62% of ENGLP's demand profile by volume.

- a) Does the above statement include IGPC volumes? If yes please provide the system sales to direct purchase ratios net of IGPC volumes.
- b) Please provide the portion of direct purchase and system sales customers by rate class.

VECC-6

Reference: Aylmer Plan, page 25,

- a) What is the estimated time frame for ENGLP to develop its RNG plan?
- b) For the Aylmer franchise what are the high and low scenarios for the amount of gas that might be RNG sourced (by volume and percentage of overall annual system gas purchases).

EPCOR Southern Bruce Gas Supply Plan: 2020-2023 (SB Plan)

VECC-7

Reference: SB Plan page 9 & 13-14

- a) With respect to storage options, over the term of the plan (i.e. to 2023) what is estimated annual premium for the chosen LBA and LST Service as compared to use of T3/M9 options now unavailable to the South Bruce franchise?
- b) What is the estimated premium or discount for the South Bruce franchise as compared to similar storage needs in the Alymer franchise?

VECC-8

Reference: SB Plan pages 22-23

- a) The SB plan compares price variation among the three studied options. Are any of the supply plan options preferable from the perspective of price stability (i.e. minimization of PGVA variances)? If so, please explain.

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