2020-07-31 Federation of Rental-housing Providers of Ontario EB-2020-0160 Interrogatories to Essex County Windsor Line Repl.- S101

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 County (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.

We would like to understand Essex County's understanding of the ability of the replacement pipe to meet future needs.

- 1) Please provide Essex County's understanding of the amount of capacity available from the replacement pipeline in comparison:
 - a) to the capacity of the existing pipeline.
 - b) to the incremental need of the hospital.
 - c) to the incremental need of the hospital with other growth forecasted by Essex.
- 2) Please provide all correspondence from EGI that addressed the specific incremental capacity of the pipeline beyond communication that cites simple statements as "like for like" and the capacity meets the EGI twenty year forecast.
 - a) What is Essex's understanding of who would pay for a new pipeline if the replacement pipe had to be replaced in the next twenty years if the need to replace is due to capacity limitations?