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October 1, 2020

Christine E. Long  
Registrar and Board Secretary  
Ontario Energy Board  
2300 Yonge Street, P.O. Box 2319  
Toronto ON  
M4P 1E4

Dear Ms. Long,

**RE: EB-2020-0136 Enbridge NPS 20 Replacement LTC  
Interrogatories of Energy Probe**

Attached are the interrogatories of Energy Probe Research Foundation (Energy Probe) in the EB-2020-0136 proceeding, the application by Enbridge Gas Inc. to the Ontario Energy Board for a Leave to Construct order for the replacement of its NPS 20 pipeline from Cherry Street to Bathurst Street in the City of Toronto.

In the preparation of its interrogatories Energy Probe coordinated with Environmental Defense, the Federation of Rental-housing Providers of Ontario, and Pollution Probe in order to avoid duplication.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.  
Consultant representing Energy Probe

cc. Patricia Adams (Energy Probe Research Foundation)  
Joel Denomy (Enbridge Gas Inc.)  
Azalyn Manzano (OEB Staff)  
David Stevens (Aird & Berlis LLP)

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**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*,  
S.O. 1998, c. 15 (Sched. B), as amended (the “OEB Act”);

**AND IN THE MATTER OF** an application by Enbridge Gas  
Inc. under section 90 of the OEB Act for an order or orders  
granting leave to construct natural gas distribution pipelines  
and ancillary facilities in the City of Toronto.

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**Enbridge Gas Inc. Leave to Construct Application for the Replacement of its NPS 20  
Pipeline from Cherry Street to Bathurst Street in the City of Toronto**

**Energy Probe Interrogatories to Enbridge Gas Inc.**

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**October 1, 2020**

**A-EP-1**

**Reference:** Exhibit A, Tab 1, Schedule 1, Page 1

**Preamble:** Energy Probe would like to understand why Enbridge is proposing to replace this particular section of the Kipling Oshawa Loop at this time instead of some other section.

- a) Does the Kipling Oshawa Loop (KOL) extend from Kipling Avenue in Toronto to the City of Oshawa? If the answer is no, please explain why not.
- b) Please provide the following information about the KOL:
  - i. Total length in km
  - ii. Pipe diameter (s)
  - iii. Pipe materials, type of steel, manufacturer, yield strength
  - iv. Current operating pressure(s) and percent of SMYS of each section of the entire KOL
  - v. Coating(s)
  - vi. Cathodic protection

**B-EP-2**

**Reference:** Exhibit B, Tab 1, Schedule 1, Page 1, paragraph 1

**Preamble:** Energy Probe would like to understand how and why Enbridge management reached the decision to replace this particular section of KOL from Cherry Street to Bathurst Street.

- a) On which date did Enbridge Gas management decide to replace this section of KOL?
- b) Please provide the positions/titles of management staff who made the decision.
- c) Please file the information that was presented to management staff in support of the decision including all presentations and reports.

**B-EP-3**

**Reference:** Exhibit B, Tab 1, Schedule 1, page 2

**Preamble:** *“Analysis conducted by Enbridge Gas in 2015 and 2016 via an asset health review (AHR) observed that vintage steel mains, defined as those mains installed in the 1970s and prior thereto, have demonstrated declining health compared to steel mains installed after the 1970s.”*

Please file the Asset Health Review report conducted in 2015 and 2016 that Enbridge is referencing.

**B-EP-4**

**Reference:** Exhibit B, Tab 1, Schedule 1, page 3, paragraph 6

Please file the section from the most recent Asset Management Plan where the KOL is discussed.

**B-EP-5**

**Reference:** Exhibit B, Tab 1, Schedule 1, pages 3 and 4

**Preamble:** *“Since the C2B segment of the KOL was completed, certain segments have been replaced or relocated as a result of road work or developments along the running line of the pipeline.”*

- a) Were any segments of the NPS20 line between Cherry Street and Bathurst Street replaced or relocated since 1990?
- b) If the answer to a is yes, please list the segments by location and the length of each segment.

**B-EP-6**

**Reference:** Exhibit B, Tab 1, Schedule 1, page 4 and 5

**Preamble:** *“In 2016 and 2018, Inline Inspections (ILI) using a robotic crawler tool were performed on approximately 1.9 km of the 4.5 km section of pipeline being replaced by the Project.”*

- a) What were the reasons for selecting the 1.9 km segment between Cherry Street and Parliament Street for ILI instead of some other segment of NPS20?
- b) Was an analysis performed that would indicate that this particular segment of NPS 20 is representative of the condition of the 4.5 km section or of the entire KOL? If there is a report of the analysis, please file it. If there is no report, please explain how management was informed of the results of the analysis.

**B-EP-7**

**Reference:** Exhibit B, Tab 1, Schedule 1, Page 7

**Preamble:** *“These projections were developed using an engineering forecasting model called PiMSlider”.*

- a) Is PiMSlider a model that is used by other gas distributors and transmitters for engineering forecasting or is Enbridge Gas the only user of this model?
- b) Please explain how the PiMSlider model works and why the OEB should have confidence in the forecasts produced by the model.

**B-EP-8**

**Reference:** Exhibit B, Tab 1, Schedule 1, Page 7

**Preamble:** *“Based on the data gathered through the completed ILIs, Enbridge Gas forecasts that around 72 integrity digs would have to be conducted on the inspected sections of the C2B segment in the next 40 years (taking into account that required digs could be combined where close to one another).”*

- a) Please explain why the OEB should be concerned about 72 “integrity digs” in the next 40 years.
- b) Please confirm that an integrity dig is an excavation that Enbridge management decides to do.
- c) How many integrity digs does Enbridge Gas do each year?
- d) Please provide the number of integrity digs per year per km for each diameter of steel pipe in the Enbridge Gas system for the last five years.

**B-EP-9**

**Reference:** Exhibit B, Tab 1, Schedule 1, Page 7

**Preamble:** *“Using the information provided by the ILIs, Enbridge Gas developed a forecast of the number of integrity digs that could be required on the full C2B segment over the next 40 years. In total, 171 integrity digs are expected over the next 40 years.”*

- a) Please confirm that the forecast of 171 integrity is a simple arithmetic proration of 72 digs over 1.9 km prorated over 4.5 km length from Cherry Street to Bathurst Street.
- b) Please explain why the OEB should have confidence in a forecasting model that uses a simple arithmetic proration.

**B-EP-10**

**References:** Exhibit B, Tab 1, Schedule 1, Pages 7 and 10

**Preamble:** *“This model is used by Enbridge Gas’s Integrity Management department to determine expected corrosion growth rates on existing features identified by ILIs.”*

- a) Please provide all assumptions regarding the forecast of expected corrosion rates including cathodic protection pipe to soil potentials over the next 40 years.
- b) Please describe cathodic protection actions that Enbridge could take over the next 40 years to ensure that pipe to soil potentials remained in the range that would protect the pipe from corrosion.

**B-EP-11**

**Reference:** Exhibit B, Tab 1, Schedule 1, Page 8

**Preamble:** *“Specifically, due to the location of the C2B segment relative to the parts of the segment for which ILIs were conducted, comparable environmental conditions (such as high concentrations of petroleum hydrocarbons and volatile organic compounds) and its year of construction, Enbridge Gas believes it is reasonable to expect that the remaining 2.6 km of the C2B segment is in a similar condition to that of the segments of C2B for which ILIs were conducted.”*

- a) Please confirm that the old Station A, manufactured gas plant operated by Consumers Gas until 1955 was immediately to the north of the Cherry Street to Parliament Street segment and that the plant used coal and oil in the manufacture of gas.
- b) Is it possible that the high concentrations of petroleum hydrocarbons and volatile organic compounds were caused by seepage from the plant and are therefore unique to this segment of NPS 20 pipeline from Cherry Street to Bathurst Street .

#### **B-EP-12**

**Reference:** Exhibit B, Tab 1, Schedule 1, Page 10

- a) Please provide the location of the 3 locations totalling 6.1 metres that have less than 60 cm of cover than required by the CSAZ662 standard.
- b) For how long has Enbridge Gas been aware that these three locations do not meet the requirements of the CSAZ662 standard.
- c) Has Enbridge Gas informed the TSSA that its NPS 20 does not have adequate cover at three locations? If the answer is yes, please file the report that Enbridge sent to the TSSA regarding this non-compliance with CSAZ662. If the answer is no, please explain why not.
- d) Can additional cover be placed at these three locations or can the pipe be lowered?

#### **B-EP-13**

**Reference:** Exhibit B, Tab 1, Schedule 1, Page 11

- a) Please confirm that the pipe joints on NPS 20 are welded and that compression couplings are only used on laterals that tap into the line.
- b) How many compression couplings are on lines attached to the Cherry Street to Bathurst Street segment NPS20?
- c) For how many years has Enbridge been aware of potential problems with compression couplings?

- d) Please explain why Enbridge has not relaced compression couplings on laterals on NPS 20 when it became aware of the problem.

#### **B-EP-14**

**Reference:** Exhibit B, Tab 1, Schedule 1, page 11

**Preamble:** *“Compression couplings on steel mains that are unknowingly isolated from the corrosion protection system could result in inadequate cathodic protection, leading to accelerated corrosion and potential loss of containment. Some vintage gas mains (such as the KOL) do not have sufficient records identifying the existence and location of these fittings.”*

- a) Please confirm that the quoted passage is a generic statement which may not be indicative of the status of compression couplings on taps and laterals attached to the Cherry Street to Bathurst Street section of NPS 20.
- b) Are there sufficient records for the Cherry Street to Bathurst Street section of NPS 20 to identify the existence and location of compression couplings fittings? If the answer is no, please explain why not and what would be required to create a record that would identify the location of compression couplings on the Cherry to Bathurst section of NPS 20. If the answer is yes, please file an exhibit that shows the location of compression couplings on that section of NPS 20.

#### **B-EP-15**

**Reference:** Exhibit B, Tab 1, Schedule 1, Page 28

**Preamble:** *“For the Repair Option analysis, Enbridge Gas assumed that 171 integrity digs would have to be conducted over the next 40 years. The integrity digs were assumed to be either repairs or replacements.”*

Did Enbridge assume that the Replace Option would have no integrity digs over the next 40 years? Please discuss.

#### **C-EP-16**

**Reference:** Exhibit C, Tab 1, Schedule 1, Page 2

**Preamble:** *“Enbridge Gas has contacted the City of Toronto (City) and Toronto and Region Conservation Authority (TRCA) regarding the Project. The City and TRCA were also provided a copy of the ER as part of the OPCC review process. The City and the TRCA have not provided comments on the ER.”*

- a) Did Dillon seek input from the City of Toronto, and the Toronto and Region Conservation Authority in the preparation of the ER? If the answer is yes, please explain how this input was sought and what information was obtained. If the answer is no, please explain why not.

- b) Is Enbridge concerned that City of Toronto and the TRCA have not provided comments on the ER? If the answer is yes, please explain what Enbridge has done to obtain comments on the ER from the City of Toronto and the TRCA. If the answer is no, please explain why Enbridge is not concerned.

#### **C-EP-17**

**Reference:** Exhibit C, Tab 1, Schedule 1, Page 3

**Preamble:** *“Additionally, independent experts were hired to opine on the routes developed by Enbridge Gas, to recommend and evaluate alternative routes for the Project and to develop an ER for the Project.”*

- a) Please list the names and file the CV’s of independent experts.
- b) Please file copies of all communications of all communications between independent experts and Enbridge.

#### **C-EP-18**

**Reference:** Exhibit C, Tab 1, Schedule 1, Page 3

**Preamble:** *“Golder’s evaluation and recommendations were developed using their proprietary “GoldSET” methodology.”*

- a) Please explain what GoldSET methodology does.
- b) Please explain why the OEB should have confidence in Golder’s evaluation using its GoldSET methodology considering that there was no input from the City of Toronto or TRCA.

#### **C-EP-19**

**References:** Exhibit C, Tab 1, Schedule 1, Page 10

**Preamble:** *“All required land easements, permits and necessary agreements will be coordinated with the following:*

- *Ontario Energy Board*
- *Ontario Ministry of Environment, Conservation and Parks (MECP)*
- *Ontario Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI), formerly Ministry of Tourism, Culture and Sport (MTCS)*
- *Ontario Ministry of Transportation (MTO)*
- *Hydro One Networks Inc.*
- *City of Toronto*
- *Toronto and Region Conservation Authority (TRCA)”*

Considering that the OEB does not issue permits or own land on which Enbridge is seeking easement, why is the OEB included in the list?



**C-EP-20**

**Reference:** Exhibit C, Tab 1, Schedule 1, Attachment 1, Environmental Report (Placeholder)

- a) When was the Environmental Report completed?
- b) Please explain why the Environmental Report was not filed with the original application.
- c) When and how was the Environmental be filed?

**D-EP-21**

**Reference:** Exhibit D, Tab 1, Schedule 1, Page 2

Has the City of Toronto agreed to the 1 m depth of cover?

**D-EP-22**

**Reference:** Exhibit D, Tab 1, Schedule 1, Page 3

What will Enbridge Gas do if it does not obtain all of the required permits and approvals by April 2021?

**D-EP-23**

**Reference:** Exhibit D, Tab 1, Schedule 1, Page 5, Table 3

Please provide the supporting information for each item in Table 3.

**D-EP-24**

**Reference:** Exhibit D, Tab 1, Page 5

**Preamble:** “The cost estimates set out above include a 30% contingency applied to all direct capital costs to reflect the preliminary design stage of this Project.”

- a) Please explain the reason Enbridge is applying for approval of a 30% contingency for this project when it used a 15% contingency in the EB-2019-0172 Windsor Pipeline Replacement Project.
- b) Please confirm that the 30% contingency is applied to all direct capital costs including materials, labour, external permitting, land, outside services, and direct overheads.
- c) Please explain why materials, labour, external permitting, land, outside services, and direct overheads would all have the same risk that would justify using the same 30% contingency.

**D-EP-25**

**Reference:** Exhibit D, Tab 1, Page 5

- a) Please provide a breakdown of the \$24,073,159 Indirect Overheads estimate including a list of costs of Enbridge departments that Enbridge is proposing to allocate to the project and capitalize.
- b) Please confirm that the \$24,073,159 would be expensed if the OEB does not approve this project.
- c) Please confirm that allocated costs of \$24,073,159 are not incremental costs and should not be included in Enbridge's upcoming application for Incremental Capital Module funding of this project.

**E-EP-26**

**Reference:** Exhibit E, Tab 1, Schedule 1, Page 2

- a) If the City of Toronto or any of the other entities listed refuses to issue permits necessary for construction is Enbridge planning to file application(s) under Section 101 of the OEB Act with the OEB for authorization to proceed with construction without permits as it did in the EB-2020-0160 proceeding? Please explain your answer.
- b) If the OEB issues a Leave to Construct order to Enbridge in this proceeding will Enbridge make a commitment that it will not start construction until it has received all permits or the OEB has made such permits unnecessary by order or orders authorizing construction under Section 101 of the OEB Act?

**Respectfully submitted on behalf of Energy Probe by its consultant,**

**Tom Ladanyi**  
**TL Energy Regulatory Consultants Inc.**