

VIA E-MAIL

October 1, 2020

Ontario Energy Board  
Attn: Ms. C. Long, Board Secretary  
P.O. Box 2319  
27<sup>th</sup> Floor, 2300 Yonge Street  
Toronto ON M4P 1E4

**RE: EB-2020-0136– EGI NPS 20 Lakeshore Blvd. – FRPO IR's**

Please find attached the interrogatories of the Federation of Rental-housing Providers of Ontario. As directed in Procedural Order No. 1, we communicated with Energy Probe, Pollution Probe and Environmental Defence to plan areas of inquiry. Further using both draft and actual interrogatories submitted, we edit our planned IR's to reduce duplication.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

- c. J. Denomy, EGI Regulatory Proceedings – EGI  
Interested Parties

**REF:** Exhibit B, Tab 1, Schedule 1, Pages 2-11

Preamble: In the above reference, EGI describes the condition of the subject pipeline. We would like to understand better, assessment done, mitigation that was applied and choices made to limit the assessment.

- 1) Given the integrity concerns created, when EGI was doing the integrity digs in 2016-2018, was any corrosion mitigation applied such as anodes to improve the corrosion resistance of the pipe, at least, on an interim basis?
  - a) If yes, please describe the approach and the additional investment applied.
  - b) If not, please explain why no investment was made to reduce the congoing corrosion to delay the need for further

EGI evidence states: *“Based on the observations described above, and in consideration of the additional costs that would be incurred, Enbridge Gas made the decision to not conduct an ILI of the remaining 2.6 km of the C2B segment.”*

- 2) Please provide the actual cost to conduct ILI inspections for the first 1.9 km of the project.
  - a) Please provide the estimated cost to conduct ILI for the remaining 2.6 km of the project.
  - b) Please provide the analysis, report and/or recommendation that led EGI to estimate the condition of the remaining 2.6 km.
- 3) Please provide the output from PiMSlider model including any glossary which assists with interpretation.

**REF:** Exhibit B, Tab 1, Schedule 1, Pages 9-10 and  
Section 101, EB-2019-0172, Exhibit B, Tab 1, Schedule 1, Pages 3-4

We would like to understand better EGI's policy on depth of cover. In the instant proceeding, EGI states that while the CSA Z662 has a minimum cover of 0.6m, EGI's minimum depth is 0.9m. However, in Section 101 application for the Windsor Line replacement, EGI states that it initially proposed 0.75 km.

- 4) Please reconcile this seeming contradiction in two current proposed projects.
  - a) Please provide the company's policy on depths as it pertains to new installations and existing installations
  - b) For table 4, please provide how many instances and lengths are between 0.75 m and 0.9 m.
  - c) In the last 5 years, how many HP Steel lines has EGI installed at the minimum depth of 0.75m?
    - i) Please provide the individual projects, the pipe size and the lengths.

**REF:** Exhibit B, Tab 1, Schedule 1, Pages 19-25

Preamble: In the above reference, EGI provides that NPS 16 was simulated as a replacement size and it provided pressures over 100 psig. However, EGI presents three different scenarios to establish some risk to customers if an additional scenario occurs. We would like to understand the potential impact of NPS 16 sizing.

- 5) Please provide a high-level cost estimate for NPS 16 for the 4.5km project.
  - a) For each of the scenarios, please provide a cost estimate to modify the station(s) that would project to have inlet pressure reductions to ensure continuity of service to customers.
  - i) For each scenario, please describe the required modification (i.e., upgrade regulators and relief) and the cost for each station that requires modification.