



Fogler, Rubinoff LLP
Lawyers

77 King Street West
Suite 3000, PO Box 95
TD Centre North Tower
Toronto, ON M5K 1G8
t: 416.864.9700 | f: 416.941.8852
foglers.com

November 2, 2020

Reply To: Albert M. Engel
Direct Dial: 416.864.7602
E-mail: aengel@foglers.com
Our File No.: 204982

VIA RESS AND EMAIL

Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Attention: Christine E. Long,
Board Secretary

Dear Ms. Long:

Re: EB-2020-0192: Enbridge Gas Inc., London Line Replacement Project

1. The Building Owners and Managers Association ("BOMA") thanks the Board for permitting BOMA to file additional information in support of BOMA's request for intervenor status and cost award eligibility in the above noted proceeding.

Description of the Intervenor and its Membership particular to the London area

2. BOMA has many members with large commercial buildings in the London Area whose rates will be impacted by this major pipeline replacement project over the next 1 to 3 year period.

Interest of the Intervenor in the Proceeding and the Grounds for the Intervention

3. Recognizing that the Application deals with a pipeline replacement project designed to address pipeline integrity, BOMA is particularly interested in scrutinizing the following specific aspects of this proceeding:
 - (a) The prospects for deferral of the project;
 - (b) Whether the project is prudent;
 - (c) Whether best practices have been applied in the planning of the project;
 - (d) Whether there are opportunities to reduce the total estimated \$164.1 million cost of the Project;
 - (e) The relationship between the total estimated cost of \$164.1 million, the total estimated cost of \$139.9 million without indirect overheads included and the mainline costs of \$95.2 million for which the Leave to Construct application seeks approval;
 - (f) Whether all alternatives have been appropriately considered;

- (g) Whether the proposed pipe sizes (NPS 4 and 6) are the most appropriate as the application and evidence contains a previous description of the proposal that described the replacement of approximately 75km of NPS 8 and 10 with NPS 8.
- (h) Is there opportunity to reduce the capacity through IRP and DSM.
- (i) An explanation of why the many high risk aspects of the existing pipeline, for example, unconstrained couplings, insufficient ground cover, vulnerable aboveground crossings, excessive corrosion, and the need to operate the pipeline at pressures substantially below MOP, have not been addressed for a lengthy period of time.

BOMA respectfully requests your acceptance of this additional information to its original intervention request dated October 16, 2020.

Yours truly,

FOGLER, RUBINOFF LLP

Albert M. Engel
AME/dd

CC: Zora Crnojacki, OEB (*via email*)
Rakesh Torul, EGI (*via email*)
Charles Keizer, Torys (*via email*)
Tom Brett, Foglers (*via email*)
Marion Fraser, Fraser & Company (*via email*)
Bala Gnanam, BOMA (*via email*)