EB-2020-0192

ONTARIO ENERGY BOARD

Enbridge London Replacement Leave to Construct

POLLUTION PROBE INTERROGATORIES

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Pollution Probe #1

[Ex. A, T2, Sch. 1]

Reference: “The Existing Lines comprise the London South Line and London Dominion Line which are two pipelines that are parallel to each other, approximately 60 km and 75 km in length, respectively. These pipelines includes pipe segments that are NPS 8, 10 and 12 with a maximum operating pressure (“MOP”) of 1900 kPa (275 psig)”

a) Please explain how two high pressure pipelines ranging from NPS 12 to NPS 8 can be replaced with one NPS 6 to NPS 4 pipeline.

b) Please provide a map showing the existing pipelines by NPS 12, 10 and 8 section. Please include the proposed pipeline on the map and show which sections are NPS 6 or NPS 4.

c) Please provide a map showing the customer area served by natural gas from the existing pipeline. Please confirm that the proposed pipeline will serve the same customer area, or if not please provide a map showing the area that pipeline will serve.

d) Please confirm that customers in the City of London are a significant load served by the existing and proposed pipelines.

e) Please confirm that the existing and proposed pipelines only serves Ontario Ratepayers or if not, please explain what other customers are served by gas from these pipelines.

Pollution Probe #2

[Ex. A, T2, Sch. 2]

a) The proposed pipeline runs from the Dawn Compressor Station to the Komoka Transmission Station. Does this just provide a 2-way feed to supply customers between these two point or serve another purpose? Please explain.

b) It appears that the HP pipeline will move gas from the Dawn Hub to the Komoka Transmission Station which then supplies other parts of the Enbridge system. Enbridge has classified the proposed pipeline as a distribution line. Please

provide a definition for a ‘distribution pipeline’ and ‘transmission pipeline’ to help differentiate why this is not considered a transmission line.

Pollution Probe #3

[Ex. B, T1, Sch. 1]

a) Please file a copy of Enbridge’s current Asset Plan and explain how the current proposed pipeline (NPS 6/4) are supported by that plan.

b) Has the TSSA reviewed and approved the proposed pipeline design and location. Please provide a copy of all correspondence with TSSA in relation to the proposed pipeline.

Pollution Probe #4

[Ex. B, T2, Sch. 1]

Reference: “Enbridge Gas’s Distribution Integrity Management Program (“DIMP”) continually evaluates assets to identify risks and determine the condition of pipelines in the distribution network. Analysis conducted by Enbridge Gas has shown that the existing London Lines are in poor condition and have several active degradation factors, including loss of containment, shallow depth of cover, and corrosion induced wall loss”

a) Please provide a copy of all materials (analysis, presentations, reports, etc.) used to support the DIMP conclusion to decommission the existing NPS 12, 10 and 8 pipelines.

b) Please provide a copy of the Risk Assessment completed for the existing pipelines.

c) Please provide a copy of the Enbridge Standardized Operational 7X7 risk matrix and explain how the “medium” rating was determined for the existing pipelines.

d) Please explain the differences in the DIMP Reports completed in 2020, 2016, 2004 and 2002.

e) The Population file in Appendix A of the 2020 DIMP Report would not open in the filed evidence. Please provide a copy of the file.

f) Please explain what options are available to prolong the life of one or both of the existing pipelines.

g) The London lines include over 134 km of pipeline. Please explain why only part of the lines are proposed to be decommissioned if they are all of a similar vintage.

Pollution Probe #5

[Ex. B, T1, Sch. 1]

Reference: In areas where it is not practical to remove the existing pipeline it will be abandoned in place.

a) Please provide a copy of any policy, manuals, guidelines or other relevant material that Enbridge uses to determine when to abandon in place vs. remove an abandoned pipeline.

b) Has Enbridge received confirmation from the road authority that it will accept abandonment in place for portions of the pipeline? If so, please provide a copy of such approval.

c) Please explain how Enbridge will determine when it is not practical to remove sections of the existing pipelines and who at Enbridge will make that decision.

d) Are any 148 service connections off the proposed pipeline included in the scope of this Project? If yes, please provide the estimate costs associated with these.

e) How many of the 148 service connections off the existing NPS 12, 10 and 8 pipelines are newer than 40 years old and what is their residual capital value.

Pollution Probe #6

[Ex. B, T1, Sch. 1]

a) Has Enbridge contacted all impacted municipalities to determine of road widening projects are likely to occurs along the right-of-way? Please provide details of any potential road widening projects and what Enbridge has done to mitigate potential need for pipeline relocation in the future.

Pollution Probe #7

[Ex. B, T2, Sch. 2]

a) Please provide an explanation based on Enbridge's analysis how the current or future maximum design day needs were matched to the pipeline size chosen and whether there will be any excess peak capacity available.

b) Please outline any load growth or load decrease assumptions used in the modeling over the life of the proposed pipeline.

Pollution Probe #8

[Ex. B, T2, Sch. 2]

a) Enbridge indicated that the DSM option was "eliminated in preliminary assessment of facility and non-facility alternatives" [Exhibit B, Tab 2, Schedule 2 Page 13]. Please provide a timeline for the planning and decision to replace the existing pipelines with a new pipeline and include the point in time the DSM analysis was conducted and option eliminated.

b) Options for replacement included a full range of pipeline sizes which would impact throughput capacity and project costs. Please provide a table of per meter project cost assumptions that Enbridge uses (or would reasonably use) to assess and compare the cost of various HP ST pipeline size options including the range of sizes from NPS 12 to NPS 4. Please make the table comparable to the costs in this application for the proposed NPS 6 and NPS 4 pipeline option selected.

c) If Enbridge could delay the replacement option by 5 years, would that change the ability to leverage other options such as DSM? If not, why not.

Pollution Probe #9

[Ex. B, T2, Sch. 2]

Reference: The City of London is reducing greenhouse gas emissions by at least 30% by 2030 and reach net-zero by 2050. Actions are supplemental to Enbridge DSM efforts and will include initiatives such as making replacement heating systems be net-zero energy/emission by 2030.

Please explain how the City of London energy and emissions actions were taken into account during Enbridge modelling for this project.

Pollution Probe #10

[Ex. B, T2, Sch. 4]

Reference: “Enbridge Gas found that the cost of investment in sufficient supplemental DSM programming to reduce system demands by 359 m3/h was approximately $4.3 million over two years. This solution would only provide peak hourly system demand reductions sufficient to defer the need for the proposed project or a further pipeline expansion project by two years based on Enbridge Gas’s current demand forecasts”

a) Please confirm that Enbridge uses the ‘measure life’ to determine the total natural gas savings from a measure under its DSM program (and related net benefits of net TRC). If that is not correct, please explain.

b) Please provide a list of the programs and related measure lives used to model the DSM scenario mentioned above.

c) It appears that the project modelling above may have assumed that the DSM results from the programs only last for the period where DSM spending occurs (e.g. 2 years in this case). Please confirm that assumption was used for this project or if not, please clarify what persistence assumption was used for the DSM results.

d) Enbridge indicates that the DSM scenario to reduce pipe size would costs approximately $1.2 million (4.3 [DSM costs] – 2.9 [pipe cost reduction]) more than the proposed project. Please provide an NPV calculation from the Ratepayer perspective for the DSM scenario including the following:
    - Initial capital costs/saving (net incremental cost of $1.2)

- Cumulative energy and commodity savings from customers over the entire measure lives
- Reduction in other costs (e.g. carbon price)
- Other costs/benefits that may be appropriate (please make these clear, including the discount rate used)
- For simplicity, feel free to ignore any incremental shareholder incentive that Enbridge would receive due to the DSM option.

Pollution Probe #11

[Ex. B, T2, Sch. 4]

Reference: Enbridge indicates that it has committed to “net zero greenhouse gas (GHG) emissions by 2050; with an interim target to reduce GHG emissions intensity 35% by 2030” [https://www.enbridge.com/about-us/our-values/sustainability].

a) If this pipeline is approved and built, it will be in service well past 2050. Please explain how this new policy changes the way Enbridge plans for new natural gas pipelines such as the one proposed in this proceeding.

b) Does this policy mean net zero for just Enbridge operations or also in relation to the product (i.e. natural gas) that you distribute to end users? Please define the scope.

c) Does Enbridge measure the emissions from construction of projects like the proposed London Replacement Project and how do those emission related to the net zero emission goal?

d) Similarly, the City of London has announced goals to reduce London’s greenhouse gas emissions by at least 30% by 2030 and reach net-zero by 2050. Please explain if the City of London’s goals or actions were considered when planning for this project.

Pollution Probe #12

[Ex. C, T1, Sch. 1]

a) Enbridge indicates that the Environmental Report was developed to conform with the OEB Environmental Guidelines for Location, Construction and Operation of Hydrocarbon Pipelines in Ontario, 7th Edition, 2016 ("Environmental Guidelines). Some requirements in the Environmental Guidelines relate to activities other than the Environmental Report. Does Enbridge commit that all aspects of this project will comply with the Environmental Guidelines? If not, please explain why not.

b) Enbridge indicates that "An Environmental Protection Plan (EPP) will be developed for the Project". An EPP is typically filed with the LTC application to provide clarity on the specific mitigation plan and residual net impacts. Please file a copy if it is ready and if not please explain why the OEB should consider the project without the EPP.

c) Please provide an update of what permits have been received and the status of outstanding permits.

d) Please provide a copy of any DSM-related materials that were provided during public consultation and education for this project.

Pollution Probe #13

[Ex. C, T2, Sch. 1]

Reference: "Due to the size of the Environmental Report (ER) the ER can be found electronically on Enbridge Gas's company website under the Project Tabs at the following link: https://www.enbridgegas.com/About-Us"

a) In Leave to Construct proceedings the Environmental Report is an important part of the public record. In limited circumstances it has been difficult for Enbridge to load a copy of the Environmental Report via RESS and OEB Staff have helped to ensure it is in the Webdrawer under the proceeding number. Please file a copy of the Environmental Report or arrange for it to be added to by OEB Staff.

Pollution Probe #14

[Ex. C, T2, Sch. 1]

a) The Environmental Report published July 2020 indicates that the project consists of “approximately 75 kilometers (km) of Nominal Pipe Size (NPS) 8” high Pressure steel”. Please explain the analysis timeline that led to a reduction to NPS 6/4 following the completing of the Environmental Report.

b) Please provide a copy of the Stantec contract and bid (if tendered) for this project.

c) The ER approach outlined that an early step was to “Identify interested and potentially affected parties early in the process”. Please provide a copy of the list that was developed.

d) Please provide a copy of all OPCC and permit authority correspondence received since the ER was completed.

e) Please provide a list of all OPCC and permit authorities where a response has not been received by Enbridge.

f) Please confirm the closest distance that the proposed pipeline will be to a Provincially Significant Wetland. If this is within the Provincial Policy Statement buffer area, please confirm what approvals have been received.

g) If the proposed pipeline crosses a Provincially Significant Wetland, please estimate the total cumulative length that is involved.

Pollution Probe #15

[Ex. F, T1, Sch. 1]

a) Enbridge indicates that it will be seeking capital approval for this project in its 2021 IRM application, but then goes on to indicate that the "Enbridge Leave to Construct ("LTC") seeks approval for the mainline costs of $95.2 million as shown at Exhibit F, Tab 2, Schedule 1, Line 5. Enbridge Gas is not seeking approval for the ancillary facilities' costs (i.e. stations, services, abandonment) in this application." Please confirm that Enbridge is not requesting any OEB capital approvals in this proceeding and that capital approvals would be part of EB-2020-0181. If this is not correct, please explain.

b) Please provide a table of all costs related (only) to the Project as defined in this application (i.e. not including abandonment costs, etc.).

c) If the OEB does not approve costs related to this Project or the ancillary facilities in EB-2020-0181, what would be the outcome?