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November 10, 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-2020-0192 Enbridge Gas London Lines Replacement Project  
Energy Probe Interrogatories**

Attached are the interrogatories of Energy Probe Research Foundation (Energy Probe) in the EB-2020-0192 proceeding, the application by Enbridge Gas Inc. to the Ontario Energy Board for the approval of its proposed London Lines Replacement Project.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi  
Consultant representing Energy Probe

cc. Patricia Adams (Energy Probe Research Foundation)  
Charles Keizer (Torys LLP)  
Rakesh Torul (Enbridge Gas Inc.)

**IN THE MATTER OF** The Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B, and in particular, s.90 (1) and s.97 thereof;

**AND IN THE MATTER OF** an Application by Enbridge Gas Inc. for an Order granting leave to construct natural gas pipelines and ancillary Facilities in County of Lambton, the Township of Dawn-Euphemia, Middlesex County, the Municipality of Southwest Middlesex, the Municipality of Strathroy-Caradoc and the Municipality of Middlesex Centre

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**Enbridge Gas Inc. London Lines Replacement Project Leave to Construct Application**

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

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**November 10, 2020**

### **A-EP-1**

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

**Preamble:** “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.”

- a) Is the London Dominion Line was one of the assets acquired by the legacy Union Gas Company when it purchased the assets of Dominion Natural Gas Company Limited from Cities Service Company in 1958.
- b) Are the London South Line and the London Dominion Line located on the same side of the roads that they follow?
- c) What is the approximate physical separation of the two lines?
- d) How many direct service connections are there on each line?
- e) Are there any tie-over connections between the two lines? If the answer is yes, please provide the number. If the answer is no, please explain why not.

### **A-EP-2**

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

**Preamble:** Energy Probe would like to understand how and why Enbridge management reached the decision to replace these two lines.

- a) On which date did Enbridge Gas management decide to replace the two lines?
- 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, pages 3 and 6

**Preamble:** “*Compression couplings are known to provide minimal pull-out resistance, and depending on design, could cathodically isolate pipe. They are also a source of leaks especially if there is ground movement or large temperature fluctuations such as freeze/thaw cycles.*”

- a) Have there been any instances of pull-out on the London South Line? If the answer is yes, please provide number and year of occurrence.

- b) Please describe the method of repair if there is a pull-out.
- c) Can leaks occur even if there is no pull-out?
- d) When was the last time that Enbridge Gas or Legacy Union Gas conducted a pipe-to-soil survey of cathodic protection on the London South Line?
- e) Please file the report of the most recent pipe-to-soil survey of the London South Line.
- f) When was the last time Enbridge Gas or Legacy Union Gas conducted a leak survey of the London South Line?
- g) Please file the report of the most recent leak survey of the London South Line.
- h) Have there been any through wall corrosion leaks on the London South Line? If the answer is yes, please provide number and year of occurrence.

**B-EP-4**

**Reference:** Exhibit B, Tab 1, Schedule 1, pages 4, 5, and 6

- a) What is the approximate length of London Dominion Line that has pipe joined with compression couplings and what is the length that has pipe joined with welds?
- b) Have there been any instances of pull-out on the London Dominion Line? If the answer is yes, please provide number and year of occurrence.
- c) When was the last time that Enbridge Gas or Legacy Union Gas conducted a pipe-to-soil survey of cathodic protection on the London Dominion Line?
- d) Please file the report of the most recent pipe-to-soil survey of the London Dominion Line.
- e) When was the last time Enbridge Gas or Legacy Union Gas conducted a leak survey of the London Dominion Line?
- f) Please file the report of the most recent leak survey of the London Dominion Line.
- g) Have there been any through wall corrosion leaks on the London Dominion Line? If the answer is yes, please provide the number and the year of occurrence.

**B-EP-5**

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

**Preamble:** “The London Lines between 2013 and 2019 had a leak rate of 0.43 leaks/km/year, which is over 10 times greater than the available average leak rate for the steel main population.”

- a) Please list five lines with the highest leak rates with the leak rate for each one.
- b) Please compare the leak rate of London Lines and The Windsor Line and discuss the reason for the difference

**B-EP-6**

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

**Preamble:** “Although there are currently 5 active Class C Leaks, Enbridge Gas has been monitoring as many as 29 active Class C Leaks since 2013.”

- a) Please describe the monitoring of active leaks including the process, monitoring frequency and approximate cost of monitoring per year.
- b) Were leaks that are no longer monitored repaired? If the answer is yes, what was the method of repair and approximate cost or repair per leak? If the answer is no, please explain why not.

**B-EP-7**

**Reference:** Exhibit B, Tab 1, Schedule 1, page 9

- a) Have there been any instances where either the London South Line or the London Dominion line was damaged by heavy agricultural equipment due to insufficient depth of cover? If the answer is yes, please provide a list showing the year of occurrence and the description of damage and repair.
- b) What lengths of London South Line and London Dominion Line are located on agricultural land?

**B-EP-8**

**Reference:** Exhibit B, Tab 1, Schedule 1, page 19

- a) Why is a new NPS 6 line needed to connect London Line to the Strathroy Gate Station?

- b) What is the approximate cost of this line?
- c) Is the Strathroy Gate Station an existing station? If it is a new station or a rebuild of an existing station, please provide its cost of construction.

**F-EP-9**

**Reference:** Exhibits F, Tab 1, Schedule 1, page 1 and Tab 2, Schedule 1; Exhibit B, Tab 1, page 19

**Preamble:** “Enbridge Gas is not seeking approval for the ancillary facilities’ costs (i.e. stations, services, abandonment) in this application. These costs have been included in the total Project cost for completeness.”

Please provide a more detailed table that shows separately the cost of stations, services, and abandonment, and the cost of the 8.4 km new NPS 6 pipeline to Strathroy Gate Station.

Please list project costs that have already been spent such as the cost of survey, engineering, environmental route selection, indigenous consultation and purchased materials.

Respectfully submitted on behalf of Energy Probe by its consultant,

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.