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November 11, 2020

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Our File No. 204982

VIA RESS AND EMAIL

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON
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Attention: Christine E. Long,
Board Secretary

Dear Ms. Long:

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

Pursuant to Procedural Order No. 1 dated October 29, 2020, please find attached BOMA's Interrogatories. We inadvertently missed yesterday's deadline after missing the Board's November 4th letter.

Yours truly,

FOGLER, RUBINOFF LLP

A handwritten signature in black ink, appearing to be "A. Engel", written over a horizontal line.

Albert M. Engel

AME/dd

Encl.

cc: All Parties (*via email*)

ONTARIO ENERGY BOARD

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

**INTERROGATORIES OF
THE BUILDING OWNERS AND MANAGERS ASSOCIATION ("BOMA")**

November 11, 2020

Albert M. Engel
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Counsel for BOMA

BOMA-1

Ref: Exhibit B, Tab 1, Schedule 1, Page 4 of 20, Paragraph 7

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..

Question(s):

- (a) What is pull-out resistance?
- (b) When did it become known to EGI that compression couplings provide minimal pull-out resistance?

BOMA-2

Ref: Exhibit B, Tab 1, Schedule 1, Page 6 of 20

Preamble:

Due to the vintage, the quality of steel pipe and the general deteriorating conditions, the London Lines have not consistently operated near MOP of 1900 kPa for some time. The London Lines currently operate at a MOP of 1415 kPa to reduce the number of leaks.

Question(s):

- (a) How long have the pipelines been operating at pressures below MOP?
- (b) What impact has this had on pricing and service over this period?

BOMA-3

Ref: Exhibit B, Tab 1, Schedule 1, Page 19 of 20, Paragraph 48

Preamble:

A new Pipeline is also proposed to start at Strathroy Gate Station (Calvert Drive, Municipality of Strathroy-Caradoc). It will be NPS 6 and run for 8.4 km along Sutherland Road. At the intersection of Sutherland Road and Falconbridge Drive, it will tie into the NPS 6 main. This pipeline will provide a back-feed to the London Line corridor by adding a secondary feed from the Dawn to Parkway System via Strathroy Gate Station. This back-feed also provides the opportunity to install a smaller pipe size for the replacement, and provides operational flexibility in the future.

Question(s):

- (a) How does the back-feed provide the opportunity to install a smaller pipe size for the replacement and provide operational flexibility in the future?

BOMA-4

Question(s):

Why have the many high risk aspects of the existing pipelines, for example, unconstrained couplings, insufficient ground cover, vulnerable aboveground crossings, excessive corrosion, and the need to operate the pipeline at pressures substantially below MOP, not been addressed for a lengthy period of time?

BOMA-5

Ref: Exhibit B, Tab 2, Schedule 1, Attachment 1, Page 3 of 10

Preamble:

The London Lines have been studied on other occasions.

Question(s):

- (a) Please provide copies of the previous reports on the London Lines:
 - (i) *The London Lines by Katie Hooper, 2002;*
 - (ii) *London Lines Report by Bob Wellington, 2004; and*
 - (iii) *Engineering Asset Plan – The London Lines by Jack Chen, 2016.*

BOMA-6

Ref: Exhibit B, Tab 2, Schedule 1, Attachment 1, Page 8 of 10

Preamble:

A mechanical model was applied to model corrosion leaks using available corrosion rates. Based upon the available electronic records the majority (89%) of pipe has a wall thickness of either 4.8mm, 5.6mm or 7.0mm. Using a corrosion rate of 0.046mm/yr, which is greater than

94% of the corrosion rate data points, for full wall loss the mains would have to be between 104 and 152 years of age

Based upon these calculations and corrosion rate data available we would not expect to see a significant increase in the number of corrosion leaks on this line for another 37 years. Unfortunately, due to the age, the long lengths of uncoated pipe, the large number of compression couplings and the unknown CP history there are concerns regarding the applicability of the corrosion rates.

Question(s):

- (a) Having regard to the age, the long lengths of uncoated pipe, the large number of compression couplings and the unknown CP history, when would a significant increase in the number of corrosion leaks be expected?

BOMA-7

Ref: Exhibit B, Tab 2, Schedule 2, Page 12 of 15

Preamble:

Enbridge Gas reviewed the option of installing a combination of NPS 6 and 4 ST pipeline operating at 3447 kPa, with feeds from Dawn and Strathroy. The feed from Strathroy would be a new 8.4 km 3447 kPa pipeline from Strathroy Gate Station, which is served by the Dawn-Parkway pipeline. This alternative reduced the required size of 15 km of NPS 10 to NPS 6, 51.5 km of NPS 8 to NPS 4 and 7 km of NPS 8 to NPS 6 compared to the single fed option as a result of the additional high pressure feed.

This option provided reliability of supply for emergency and operational requirements during summer and would likely be able to sustain expected loads in shoulder month temperatures such as April and October as well. Additionally, this was the least cost option of all the alternatives, and as such is the proposed design.

Question(s):

- (a) Will this option meet the demands of the design day?
- (b) What occurs if the option is unable to sustain expected loads in shoulder month temperatures?

- (c) Why are summer and should month requirements discussed in this analysis as opposed to the design day requirements?

BOMA-8

Ref: Exhibit D, Tab 1, Schedule 2, Page 1 of 2

Preamble:

The proposed pipeline will be designed as a distribution pipeline and operated at less than 30% SMYS.

Question(s):

- (a) Why will the proposed pipeline be operated at less than 30% SMYS?

BOMA-9

Ref: Exhibit F, Tab 1, Schedule 1, Page 1 of 1 and Exhibit F, Tab 2, Schedule 1, Page 1 of 1

Preamble:

1. The total estimated cost of the Project is \$164.1 million as shown at Exhibit F, Tab 2, Schedule 1, Line 7. This cost includes: (i) materials; (ii) construction and labour; (iii) environmental protection measures; (iv) land acquisitions; (v) abandonment of existing assets; (vi) contingencies; (vii) interest during construction; and (viii) indirect overheads. Excluding indirect overheads, the total estimated incremental cost of the Project is \$133.9 million.

2. The proposed 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. These costs have been included in the total Project cost for completeness. The proposed pipeline will be designed as a distribution pipeline and operated at less than SMYS.

Question(s):

- (a) What is the detailed breakdown for the estimated costs set out in Exhibit F, Tab 2, Schedule 1?
- (b) Are there any opportunities to reduce the total estimated \$164.1 million cost of the Project?