

VIA E-MAIL

December 14, 2020

Enbridge Gas Inc.  
500 Consumers Road  
Toronto, ON M2J 1P8  
Mailing Address: P. O. Box 650  
Scarborough, ON M1K 5E3

Attention: Mr. R. Torul, Technical Manager, Regulatory Projects

**RE: EB-2020-0192 – EGI London Lines Project - FRPO Request for Clarification**

We are writing to request an expedited response to an inquiry in the matters pertaining to the proposed London Lines replacement. In the midst of finalizing our submissions, we are challenged by some apparent omissions and inconsistencies in the evidence which make it difficult to provide coherent alternative approaches.

Throughout the pre-filed evidence, the applicant refers to the London Lines running from Dawn to Komoka. However, in our preparation of submissions, after sifting through the deluge of interrogatory responses, we uncovered what appears to be an omission in the evidence.

In multiple references, the interrogatory responses provide evidence of the extension of the London Lines beyond Komoka Station to the Byron Transmission Station<sup>1</sup>.

*"The London Lines span approximately 83.5 kilometres and extend from Dawn to the Byron transmission station located in the London District."<sup>2</sup>*

Information of this extension is completely absent from the pre-filed evidence and only become evident in a forensic review of the interrogatory responses.

In preparing our responses, we sought to provide the Board with submissions for the consideration of the prioritization of proposed second feed from Strathroy to allow a staged replacement of vulnerable segments of the London Lines. Upon closer inspection, it appears there is already another connection not provided in the pre-filed evidence.

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<sup>1</sup> Exhibit I.BOMA.5, Attachment 3 Page 2

<sup>2</sup> Exhibit I.ED.1, Attachment 1, Page 106 which is EGI's Asset Management Plan 2021-2025, Revised Oct. 5,2020

Prior to the Union Gas and Enbridge Gas Distribution merger and the resulting approval of Incremental Capital Module, the last Union Gas review of the Lines provided a schematic which showed the London Lines continuing to the Bryon Transmission Station<sup>3</sup>. Upon discovering this evidence in the IRR's, we found additional references that seemed to reinforce the existence of a connection between the stations at Komoka and Byron. The existence of this connection would fundamentally change our submissions to the Board. Therefore, we ask that the following questions be provided in an expedited fashion:

- 1) Does the London Dominion Line still connect the Komoka station to the Byron Transmission Station?
  - a) If so, why was this information not provided in the evidence?
    - i) Provide the size and MOP's of lines to the Byron station and a schematic of the Bryon Transmission Station showing all pipelines coming into the station, regulation in the station and pipelines and MOP's entering and leaving the station.
  - b) If not, when were the respective Dominion and South Lines disconnected?
    - i) Why were the lines disconnected?
    - ii) Please provide the internal company reports, memos and authorizations that lead to the abandonments which disconnected the London Lines from Byron.

We would ask that the responses be provided to us, other parties and put on the record in this proceeding. Please contact me should you need clarification on these inquiries.

Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

- c. OEB Registrar  
Z. Crnojacki, M. Millar – Staff  
Interested Parties – EB-2020-0192  
EGIRegulatoryProceedings -EGI

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<sup>3</sup> Exhibit I.BOMA.5, Attachment 3 Page 4, Figure 2