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Our File # 339583-000275

By electronic filing

December 21, 2020

Christine E. Long  
Registrar  
Ontario Energy Board  
2300 Yonge Street, Suite 2701  
Toronto, ON M4P 1E4

Dear Ms. Long

**Re: Enbridge Gas Inc. (“EGI”)**  
**2021 Rates – Application for Incremental Capital Module Funding**  
**Board File #: EB-2020-0181**

Pursuant to Procedural Order No. 1 dated November 27, 2020, we submit the following Interrogatories for EGI on behalf of Canadian Manufacturers & Exporters (“CME”).

Yours very truly

A handwritten signature in blue ink, appearing to read 'Scott Pollock', is written over a light blue horizontal line.

Scott Pollock

enclosure

c. Mark Kitchen (EGI)  
David Stevens (Aird & Berlis)  
EB-2020-0181 Intervenors  
Alex Greco (CME)

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**ONTARIO ENERGY BOARD**

**Enbridge Gas Inc.**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15 (Sched. B);

**AND IN THE MATTER OF** an Application by Enbridge Gas Inc., pursuant to section 36(1) of the *Ontario Energy Board Act, 1998*, for an order or orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission and storage of gas as of January 1, 2021.

**INTERROGATORIES OF  
CANADIAN MANUFACTURERS & EXPORTERS (“CME”)  
TO ENBRIDGE GAS INC. (“EGI”)**

**CME # 1**

**Ref: Exhibit B, Tab 2, Schedule 1, pages 15 and 17 of 33**

At page 17 of 33 of the application, EGI stated “The Business Case for this project is filed in Table 8 below and will be updated after the Leave to Construct application has been filed with the OEB.”

- (a) What is the current status of the Leave to Construct Application for Phase 3 of the St. Laurent Project?
- (b) Please provide the update to the business case for this project when it is available.
- (c) When filing the updated business case, including details of the alternatives considered, please provide the costs of the alternatives in the same manner as requested in CME #2(b).
- (d) With respect to this project, please describe how the phases of the St. Laurent project are distinct enough to qualify as ‘discrete projects’ for the purposes of ICM treatment.

**CME # 2**

**Ref: Exhibit B, Tab 2, Schedule 1, pages 21-24 of 33**

At page 21 of 33, EGI stated that “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 this analysis on the record in this proceeding.
- (b) Please provide a table showing the costs of each of the alternatives listed on the same basis as EGI has reported the cost of \$161.1 million.

- (c) Please break out the \$161.1 million into the drivers listed at page 24, including material, construction and labour, land costs, contingencies, overheads, abandonment and interest during construction.

**CME # 3**

**Ref: Exhibit B, Tab 2, Schedule 1, pages 27 of 33**

At page 27 of 33, EGI stated "The budget of \$32.9 million is updated from the EB-2019-0218 filing budget of \$30.8 million. The variance between the budget and the leave to construct is due to a change in overhead allocations. The budget covers all costs related to material, construction and labour, land costs, contingencies, overheads, and interest during construction."

- (a) Please break out the \$32.9 million into the drivers listed at page 24, including material, construction and labour, land costs, contingencies, overheads, abandonment and interest during construction.

**CME # 4**

**Ref: Exhibit B, Tab 2, Schedule 1, pages 28 of 33**

At page 28 of 33 of the application, EGI stated "The projects for which Enbridge Gas is seeking ICM funding address integrity issues, provide for more robust supplies to the system and allow additional customer load to access the system."

- (a) Were customers ever consulted about any of these projects in particular, or more generally regarding the need to invest in any of these sections of the systems? If yes, please describe fully what the consultations consisted of and what preferences, if any, were expressed with respect to these projects or segments of system.