

February 5, 2021

Ontario Energy Board  
Attn: Ms. C. Long, OEB Registrar  
P.O. Box 2319  
27<sup>th</sup> Floor, 2300 Yonge Street  
Toronto ON M4P 1E4

**RE: EB-2020-0198 EGI Toronto Waterfront Relocation  
FRPO Submissions on EGI Application Withdrawal**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in response to Procedural Order No. 5 requesting submissions from parties with regard to EGI's withdrawal of the Toronto Waterfront Relocation Application.

We benefited from some consultation with the School Energy Coalition (SEC) earlier this week and received advanced draft copies of the submissions of both SEC and Energy Probe (EP). We appreciate that our colleagues have addressed the substantive issues identified in the truncated process and, for efficiency will not repeat their submissions. We have one additional nuance stemming from our work with SEC in response to the Board's topics of Reliability of Gas Supply and Conditions for Withdrawal.

**EGI Proposals Did not Provide Sufficient Information Regarding Alternatives Considered**

As outlined in our earlier submissions in this proceeding, FRPO sought understanding of the impact of the respective alternatives on the capacity from each project.<sup>1</sup> We respectfully request the Board add a condition that EGI must provide information to assist the Board's understanding of the impact on capacity as it relates to the Reliability of Gas Supply to the Downtown. EGI could provide this information with its evolved proposal as a result of negotiations with Waterfront Toronto and the City. The information ought to provide the Board with comfort on the reliability of supply during and after the relocation has occurred. In this way, any incremental benefits arising from the proposed project can be recognized in the Board's consideration of the public interest.

Further, in attaining understanding of the needs of Waterfront Toronto and the alternatives considered by EGI, the withdrawal by EGI left us with unanswered questions about the efficacy of taking the feed for the proposed Station A from the west side of the Don River in the area of their recently added crossing.<sup>2</sup> We have attached the same diagram from the evidence as the SEC highlighting the location which would be much closer to the proposed Station A than EGI's applied for alternative.

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<sup>1</sup> FRPO\_SUB\_EGI TO WATERF REPL\_20210108

<sup>2</sup> EB-2018-0108 EGI Don River 30" Pipeline Project

In our experienced view, such a connection would increase the capacity to the downtown and the Portlands over the existing system but not as much as EGI's proposal. However, this approach would likely cost less than the proposed approach, increase the reliability of service to the downtown and reduce the risks for the gas system more than other alternatives requiring some form of river crossing both during and after the re-construction planned by Waterfront Toronto. As such, we respectfully submit that the Board place conditions on the withdrawal that requires EGI to report on if this connection and shorter path to Station A is a viable alternative. In the alternative, the Board could state its expectation that more information on this alternative be presented in any subsequent application for relocation.

### Conclusion

FRPO supports and adopts the submissions of SEC in this matter. Further, we respectfully submit that the Board would be better informed by adding a condition that requires EGI to enhance its evidence as outlined above.

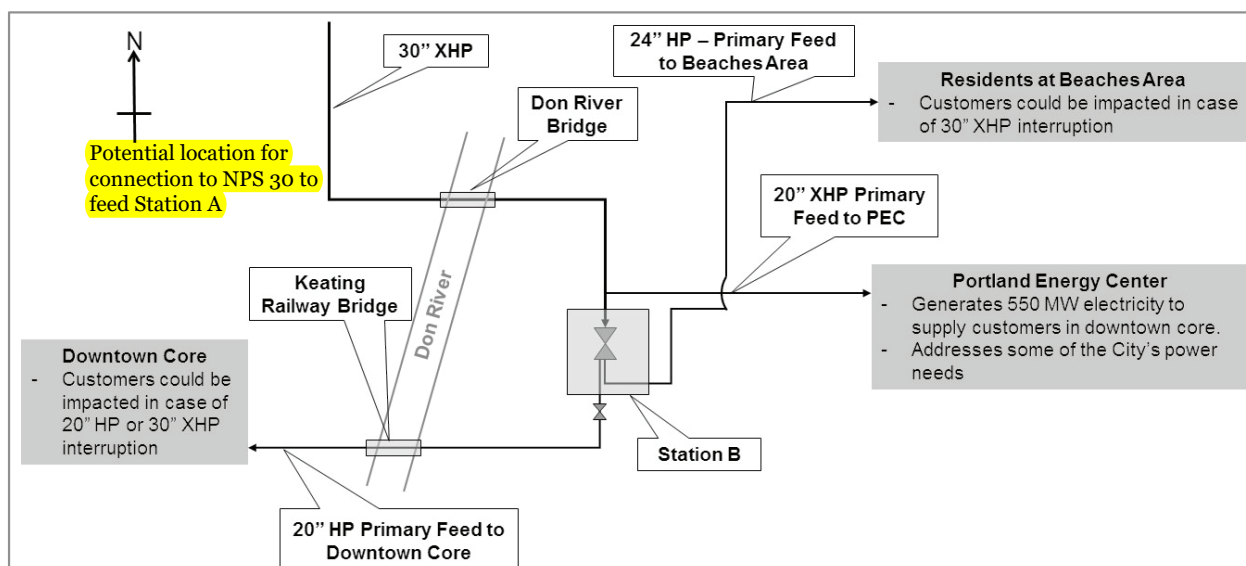
Respectfully submitted on behalf of FRPO,

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Principal  
DR QUINN & ASSOCIATES LTD.

c. J. Denomy, EGI Regulatory Proceedings – EGI  
L. Djurdjevic, R. Murray – Board Staff  
Parties to EB-2020-0198

the sole commercial provider of district heating to customers in downtown Toronto. Enwave supplies steam to more than 140 buildings representing over 40 million square feet. Some of Enwave's customers are hospitals, government buildings and office towers. Figure 5 shows how the NPS 30 XHP Don Valley Pipeline supplies the downtown Toronto area through Station B.

**Figure 5: Area Supplied by the NPS 30 XHP Don Valley Pipeline**



20. Should the NPS 30 XHP river crossing experience a pipeline defect or sustain damage, Enbridge would have to either temporarily reduce operating pressures or shut down the line. Any pipe defects or failures that could release gas would require a significant emergency response and could have severe consequences and impacts. If this happened during the winter months, significant customer outages would immediately occur. Maximum customer loss is approximately 92,500 at -23<sup>0</sup>C (which translates to 41 Degree Days, the Peak Design Temperature of GTA). At a minimum, supply would have to be terminated to PEC, which is the equivalent to the demand of 100,000 residential customers. In the