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Enbridge Gas Inc.
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VIA Email and RESS

September 22, 2021

Christine Long
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Christine Long:

**Re: Enbridge Gas Inc.
Ontario Energy Board File No.: EB-2020-0293
St. Laurent Ottawa North Replacement Project – Letter of Comment**

Enbridge Gas Inc. (“Enbridge Gas” or the “Company”) is in receipt of a Letter of Comment filed by Pollution Probe on September 13, 2021 (the “Letter”) regarding the Company’s updated application and pre-filed evidence for the St. Laurent Ottawa North Replacement Project filed September 10, 2021 (the “Updated Application”). In its Letter, Pollution Probe claims that the OEB does not have the evidence required to resume its review of Enbridge Gas’s Updated Application. By means of this Letter of Comment, the Company wishes to respond to this claim, as well as certain other misstatements of fact made by Pollution Probe in its Letter.

Misstatements of Fact

From the Company’s request “that the OEB advance its review of this Updated Application as quickly as possible”¹ Pollution Probe claims that Enbridge Gas is requesting that the OEB “not take the appropriate time to adequately assess the application”. In fact, it is the opposite, Enbridge Gas has taken its time to file this Updated Application including updating the evidence to reflect the new proposed preferred route for the Project that is supported by the Ministry of Transportation (“MTO”), in support of the OEB’s review and assessment and in accordance with its direction in its Letter of Abeyance dated May 5, 2021.

Pollution Probe incorrectly claims that Enbridge Gas’s Incremental Capital Module (“ICM”) request associated with Phase 3 of the Project was withdrawn from its 2021 Rates Application (EB-2020-0181) based on an OEB indication that a more thorough and integrated resource assessment was needed. In fact, the Company requested that it be permitted to update its pre-filed ICM evidence relevant to Phase 3 of the Project to reflect the most up to date forecast of costs available. Upon receipt of comments from

¹ EB-2020-0293, Cover Letter to Updated Evidence (September 10, 2021), p. 3.

the OEB,² Enbridge Gas decided to withdraw its request and instead to seek ICM funding for Phases 3 and 4 of the Project through a future rates application.

Pollution Probe claims that Enbridge Gas should not be able to rely on its Environmental Report or the prior review of the same by the Ontario Pipeline Coordination Committee as a result of the minor deviation of the route on the RCMP Property. The Environmental Report includes a study area that encompasses the final preferred route as outlined in the Updated Application. As such, the assessment and suggested mitigation measures outlined in the Environmental Report remain applicable. Enbridge Gas is of the view that the original Environmental Report and its review by the OPCC is not only compliant with the OEB's Environmental Guidelines, but is also sufficient for the purpose of the OEB's review of the Updated Application.

Pollution Probe claims that Enbridge Gas has modified the Updated Application from an expansion project to a replacement project. The nature of this **replacement** project remains unchanged from the original application filed March 2, 2021. The Updated Application includes an abundance of evidence illustrating the integrity issues that underpin the need to replace the pipeline.

Pollution Probe cites a Letter of Comment filed by the City of Ottawa dated May 12, 2021, and falsely claims that the City "has expressed a preference to not proceed with the project since future gas supply is forecasted to decline as they pursue their net zero target." In reality, the City expressed interest in hosting a future integrated resource planning ("IRP") pilot project and suggested that the St. Laurent Project appears to provide an excellent candidate. In its covering letter to the Updated Application, Enbridge Gas welcomed the City's interest in hosting future IRP alternatives and explained that it is considering all future system needs/constraints identified across the Province, including in the Ottawa region, for future IRP pilot programs and IRP Plans, and welcomes stakeholder engagement in accordance with the OEB's IRP Framework for Enbridge Gas. However, the Company explained that as the Project is an integrity driven replacement with a required in-service date of 2023, it is not well suited to IRP pilots. This conclusion is consistent with the OEB-approved IRP Assessment Binary Screening Criteria.

Conclusions

The Company reiterates that questions raised by Pollution Probe regarding alternatives assessed and need for the proposed Project are more appropriately posed through interrogatories. It is premature for the OEB to make decisions regarding further process steps at this time, including the need for a Stakeholder Conference. A more appropriate time to make such decisions is after the initial discovery phase of the OEB's review.

Pursuant to its letter dated March 16, 2021, the OEB previously advised Enbridge Gas that its original application was preliminarily reviewed and deemed to be complete, and as such, that the OEB would commence processing the same. The difference between the original application and the Updated Application is related to a minor deviation in phase 4 preferred route. Accordingly, it is not necessary to delay this proceeding for a

² EB-2020-0181, OEB Procedural Order No. 3 (February 5, 2021).

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small change to the route. Enbridge Gas respectfully requests that the OEB uphold its previous conclusion that the Updated Application is complete and resume its review. If you have any questions, please contact the undersigned.

Sincerely,

Adam Stiers
Manager, Regulatory Applications – Leave to Construct