

Ms. Christine Long
OEB Registrar
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

November 22, 2021

**Re: EB-2020-0293 – Enbridge St. Laurent Ottawa North Replacement Project
Pollution Probe Interrogatories to the Applicant**

Dear Ms. Long:

In accordance with Procedural Order No. 1, please find attached Pollution Probe's interrogatories to Enbridge.

An issues list has not been posted for this proceeding. However, the recently developed "generic LTC issues list" was referenced in the most recent public notice for this proceeding. Pollution Probe confirmed with OEB Staff that the OEB intends to use the generic issues list for this proceeding and has adopted it for purposes of developing interrogatories.

Pollution Probe believes that it is helpful to confirm an issues list for proceedings, when possible, to help ensure a common understanding of scope. In proceedings where an issues list is leveraged, there is typically a process requesting comments from all stakeholders on the issues list before it is finalized for the proceeding. In some cases, the OEB has included relevant issues not captured by the generic list on the Issues List for Leave to Construct proceedings.

Respectfully submitted on behalf of Pollution Probe.



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cc: Enbridge (email via EGIRegulatoryProceedings@enbridge.com)
Guri Pannu, Enbridge Legal (via email)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

**Enbridge Gas Inc.
St. Laurent North
Leave to Construct**

POLLUTION PROBE INTERROGATORIES

November 22, 2021

**Submitted by: Michael Brophy
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Consultant for Pollution Probe

Note: Per OEB Staff discussion, interrogatory numbering follows Issue#-Party-IR# using the generic LTC issues list.

1-PP-1

- a) Please confirm the year that the St. Laurent North (Phase 3 and 4 or consolidated as proposed in this application) project was first identified in the Enbridge Asset Management Plan or equivalent. Please provide a copy of that Asset Management Plan and indicate which pages are relevant to the St. Laurent North pipeline.
- b) Please explain how the scope of this project differs (if at all) from the scope of the original St. Laurent project phases 3 and 4.

1-PP-2

Please explain why the proposed project was withdrawn from OEB approval in EB-2020-0181 and how that has impacted the project.

1-PP-3

Reference: EB-2021-0148 Exhibit B Tab 2 Schedule 1 Page 26 of 35

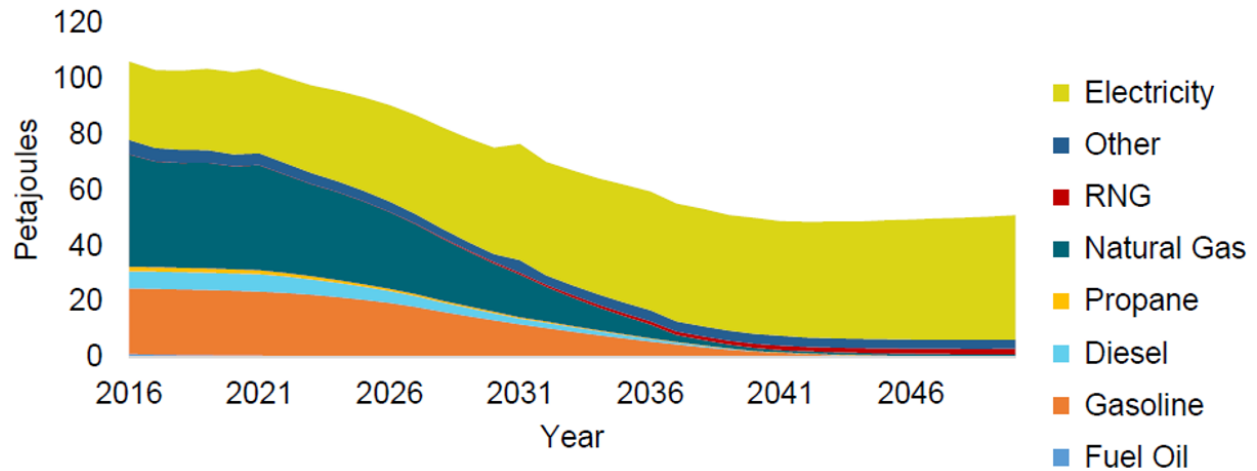
“The project will be completed in multiple phases over multiple years. The existing pipeline services over 165,000 customers in Ottawa, Ontario and Gatineau, Quebec”

- a) Please provide a breakdown of how many of the 165,000 customers are in Ottawa, Ontario and how many are in Gatineau, Quebec.
- b) Please provide the allocation breakdown for pipeline peak demand (m³ and GJ) required to serve the Ottawa, Ontario customers and the same for the Gatineau, Quebec customers.

1-PP-4

Reference: PollutionProbe_IR_AppendixA_CityOttawaEnergyTransition_20211122

City of Ottawa Energy Evolution Report, Figure 23



- Please confirm that the above forecast from the City of Ottawa Energy Evolution estimating a decline in natural gas use to 2050 was not used by Enbridge to estimate the proposed pipeline demand, throughput or related financial analysis for the proposed pipeline. If incorrect, please provide details.
- Please provide all material related to consultation with the City of Ottawa to consider the alignment of the proposed project with the City of Ottawa Energy Evolution plan.
- Will incremental (beyond those in place today) pipelines and natural gas supply be needed to meet the 2050 natural gas demand outlined in the above scenario. If yes, please explain.

1-PP-5

Reference: PollutionProbe_IR_AppendixB_2021OEBMandateLetter_20211122

“I expect to see the establishment of multi-year natural gas Demand Side Management (DSM) programming and the implementation of the OEB’s Integrated Resource Planning framework for assessing demand-side and supply-side alternatives to pipeline infrastructure in meeting natural gas system needs. I would like to express my strong interest in a framework that delivers increased natural gas conservation savings and reduces greenhouse gas emissions” - 2021 Mandate letter to the OEB.

- a) Please provide details on the amount of incremental demand-side and supply-side alternatives used to assess the demand/need for the proposed NPS 12/16 pipeline.
- b) The Ontario Energy Board Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 7th Edition, 2016 requires consideration of relevant policy when filing for a Leave to Construct. Please provide evidence references where Enbridge has included the policy direction to advance demand-side and supply-side alternatives to pipeline infrastructure in meeting natural gas system needs.

1-PP-6

Reference: PollutionProbe_IR_AppendixC_Ministerglassphaseoutletter_20211122

- a) Please identify all electricity generation customers served by gas flowing through the St. Laurent pipeline system.
- b) Please provide an estimate of the annual (daily?) volume of natural gas that would be reduced if Ontario phases out natural gas for electricity generation.

1-PP-7

- a) Please provide all available analysis and information available related to load growth (or decline) for the existing or proposed pipeline.
- b) Please provide what peak volume (m³ and GJ) the existing pipeline provides to:
 - Customers in the City of Ottawa
 - Ontario Ratepayers (customers)
 - Quebec customers
 - Other customers

2-PP-8

Is the proposed project impacted by any City of Ottawa road resurfacing work planned?
If yes, please provide the construction moratorium that would result.

2-PP-9

Reference: Exhibit B, Tab 1, Schedule 1, Page 9 of 48.

“The Company estimates that it would cost approximately \$54 million to repair the St. Laurent pipeline”

- a) Please provide the documentation detailing and supporting the \$54 million of repairs estimated to be required.
- b) If the repair option was pursued, please provide the estimated timeline for each of the repairs proposed.

2-PP-10

Please explain why Enbridge is not proposing to add anodes or other cathodic protection to the existing pipeline to resolve the issue related to lack of cathodic protection for the existing pipeline.

2-PP-11

- a) Please explain why the current pipeline which was installed around 1970 has integrity issues when many other similar pipelines in the system which are significantly older (e.g. the London Line was approximately 100 years old) are able to operate for much longer.
- b) Please provide a list of all in-service vintage steel pipelines installed prior to 1970 and indicate the year each was installed.

2-PP-12

Reference: Exhibit B, Tab 1, Schedule 1

“Enbridge Gas has applied the OEB-approved Binary Screening Criteria to the Project and determined that it is not appropriate to conduct further IRP assessment, as the Project is driven by integrity concerns that must be addressed within three years and no demand or supply side solution can resolve the integrity concerns”

- a) Please provide a copy of all documents used to apply the Binary Screening Criteria.
- b) Please provide a copy of all reports, memos, recommendations and presentations related to the binary screening for the project.

2-PP-13

Reference: EB-2019-0192 OEB Decision, page 20

“Enbridge Gas has an obligation to conduct a more rigorous Integrated Resource Planning assessment at the preliminary stage of projects development in future cases. As OEB staff also notes the failure to present detailed analyses makes it unlikely that Enbridge Gas would select an alternative including DSM or other non-build project option. The OEB acknowledges that more direction is likely to be provided to Enbridge Gas in future leave to construct projects as part of the ongoing IRP proceeding. In the interim, however, the OEB believes that all parties would be assisted if Enbridge Gas would, in the future, undertake in-depth quantitative and qualitative analyses of alternatives that specifically include the impacts of DSM programs on the need for, or project design of facilities for which Enbridge Gas has applied for leave to construct.”

- a) Please provide details on all DSM or other non-build project options that Enbridge considered for the proposed project.
- b) If Enbridge did not evaluate DSM or other non-build project option, please explain why.
- c) If Enbridge did consider DSM or other non-build project option, please explain why they were not included in the project alternatives and as options in the application to the OEB.

2-PP-14

- a) Please provide a copy of all materials completed for screening or assessing the project for purposes of integrated resource planning.

3-PP-15

Reference: EB-2021-0148 Exhibit B Tab 2 Schedule 1 Page 10 of 35

- a) Please provide the ancillary costs related to distribution stations, service relays and other costs that would result from this project.
- b) Please confirm that those ancillary costs are incremental to the project cost estimate of \$86 million.

3-PP-16

Please provide the 2022 and 2023 in-service capital amounts proposed and explain why the projects should be capitalized over two years if it is a single project (i.e. why not capitalize the project at full completion in 2023).

3-PP-17

- a) Please confirm that the scope of the project for purposes of the Leave to Construct application includes only the 16 km of steel gas distribution main of NPS 12 extra high pressure (XHP) steel (ST) pipeline and approximately 400 m of NPS 16 XHP ST. If not, please provide the detailed scope of the project for OEB LtC approval purposes.
- a) Please confirm that the total project costs are \$86 million.
- b) Please confirm what portion of the project costs are being recovered through a Contribution In Aid Of Construction (CIAC) or ex-franchise revenues.

3-PP-18

Please provide an update project schedule based on best available information.

3-PP-19

- a) Has Enbridge received a formal request to provide incremental gas to Quebec? If yes, please provide the request.
- b) Does Enbridge have a cost sharing agreement with a utility/utilities in Quebec to allocate costs related to serving Quebec customers? If yes, please provide a copy.
- c) Please provide an estimated total cost for planning and approval of the proposed project and indicate what portion of those costs will be paid by Ontario Ratepayers.

3-PP-20

Reference: PollutionProbe_IR_AppendixD_2021OEANetZeroReport_20211122

“If assets are stranded on the Ontario system, the cost of those assets still must be paid for. What this means for the customer is that natural gas rates will go up significantly because the fixed costs of those assets remain on the system, but there is less natural gas volume based revenue to pay for them. As a result, the price per cubic metre of natural gas must increase.”

- a) Please provide how costs would be recovered from Ratepayers if the proposed pipeline became a stranded assets in:
 - 2030; or
 - 2050
- b) Please confirm that Enbridge has estimated the project financials based on a 40 year amortization period (i.e. recovered in rates to 2063). If that is incorrect, please provide the proposed amortization period for the pipeline and the year which it will be fully recovered in rates.
- c) Please provide a summary of any financial and customer impacts if the proposed pipeline was amortized over 7, 10, 20 or 27 years instead of 40 years.

4-PP-21

- a) Please provide a description (including length) of the changes in the proposed pipeline route from the initial application (March 2021) to the current application (September 2021).
- b) Please provide the sections of the Environmental Report that relate to the updated portion of the proposed route.
- c) Please confirm that a detailed mitigation plan for the (update) proposed pipeline has not been completed or circulated to the OPCC. If it has been completed and circulated to the OPCC, please provide a copy.

4-PP-22

Reference: EB-2019-0006 OEB Decision

“OEB requires the EPP to be filed which is included as a condition of approval.”

The OEB identified the lack of an Environmental Protection Plan (EPP) as a gap in the previous Leave to Construct filing related to the St. Laurent Project. Please explain why Enbridge did not include an EPP in this St. Laurent filing.

4-PP-23

Reference: Dec_Order_EGI_St Laurent_20190926

“... the OEB expects that the remaining multi-phases of the St. Laurent Project be dealt with on a comprehensive basis, in one application.”

Please confirm that no stakeholder sessions or public open houses have been conducted since the OEB required the project to be considered in a more holistic manner.