



November 22, 2021

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

**RE: EB-2020-0293 Enbridge Gas Inc. St. Laurent Ottawa North Replacement Project
City of Ottawa Interrogatories to Applicant**

Dear Ms. Long:

As instructed in Procedural Order No. 1 dated November 8, 2021, please find following the City of Ottawa's Interrogatories to the Applicant. We look forward to the fair resolution of the application which a hallmark of the Ontario Energy Board's work.

If you have any questions or concerns, please feel free to contact **Mike Fletcher**, Project Manager – Environmental Program, at Mike.Fletcher@Ottawa.ca

Sincerely,

A handwritten signature in blue ink, appearing to read "Don Herweyer", with a long horizontal flourish extending to the right.

Don Herweyer
Director, Economic Development & Long-Range Planning (EDLRP)
Planning, Infrastructure and Economic Development (PIED)
City of Ottawa
Cc: Mike Fletcher (by e-mail)
All Parties (by e-mail)

City of Ottawa Interrogatories

1.0-Ottawa-1

Reference: Exhibit B, Tab 1, Schedule 1, page 12, paragraphs 19, 20,21, Figure 3, Tables 1 and 2

Citation: “This situation would also interrupt natural gas supply to the Rockcliffe Control Station which is one of two supply sources for Gazifère. Table 1 shows the customers impacted by customer type in the Enbridge Gas and Gazifère franchise areas.”

Please indicate:

Is bi-directional flow possible between Ontario and Quebec via this infrastructure and how would this proposed project impact it?

1.0-Ottawa-2

Reference: Exhibit B, Paragraph 1

Citation: “...The pipelines to be abandoned will be replaced with, approximately:1

- 9 km of NPS 12 XHP ST;
- 2.4 km of NPS 16 XHP ST;
- 4.2 km of NPS 6 intermediate pressure (IP) polyethylene (PE); and
- 3.6 km of NPS 4 IP PE.”

1. Please provide the following:
 - a) Maximum operating pressure for all existing pipelines proposed for replacement at the time they were originally installed (please provide an itemized list)
 - b) Current maximum operating pressure for all pipelines proposed for replacement (please provide an itemized list)
 - c) If there is a discrepancy between items i and ii please explain why (please list each pipeline as appropriate and indicate the reason(s) for the pressure discrepancy or discrepancies)
 - d) Can all existing pipeline lines scheduled for replacement be safely operated at their originally designed maximum operating pressure without modification? If not, please list each pipeline as appropriate and indicate the reason(s) for the pressure discrepancy or discrepancies
2. What is the maximum operating pressure for all existing and proposed pipelines? (please provide an itemized list)
3. At what percentage of maximum capacity do each of the current pipelines operate at compared to when they were originally installed. (please provide an itemized list).
4. What percent of maximum capacity will each of the proposed new pipelines operate at on a design day (please provide an itemized list).

City of Ottawa Interrogatories

5. Has the possibility of replacing some or all of the lines with lower capacity lines been considered? If not, why not? – please detail for all areas of the project as appropriate.
6. Why are decommissioned pipelines not proposed to be removed?
7. Has Enbridge endeavoured to co-ordinate this proposed work with other prospective infrastructure work so as to increase benefits to the community?

1.0-Ottawa-3

Reference: Exhibit B, Paragraph 23

Citation: “The IRP Framework

establishes six Binary Screening Criteria that allow the Company to determine whether or not any IRP alternative (IRPA) could reasonably be expected to efficiently and economically resolve an identified system constraint/need.”

Was the existence of Infrastructure Canada’s Green and Inclusive Community Buildings Program, or Public Service and Procurement Canada’s plans for the updating of the federal district energy system or the City of Ottawa’s Better Homes Loan Program or the City of Ottawa’s Building Renovation and Deep Retrofit Program or Ottawa Community Housing Corporation’s plans to deeply retrofit housing or the Gatineau Climate Plan or forecasted reduced Heating Degree Days caused by Global Heating taken into account when the Binary Screening Criteria were applied?

1.0-Ottawa-4

Reference: Exhibit B, Paragraph 24

Citation: “Hydraulically, were the entire replacement to remain an NPS 12 XHP ST pipeline, the required minimum pressures at the Rockcliffe Control Station could not be maintained.”

1. Please provide the calculations which establish the need to increase pipeline size to NPS 16 XHP ST Pipe
2. Was the existence of Infrastructure Canada’s Green and Inclusive Community Buildings Program, or Public Service and Procurement Canada’s plans for the updating of the federal district energy system or the City of Ottawa’s Better Homes Loan Program or the City of Ottawa’s Building Renovation and Deep Retrofit Program or Ottawa Community Housing Corporation’s plans to deeply retrofit housing or the Gatineau Climate Plan or forecasted reduced Heating Degree Days related to Global Heating taken into account when the need to increase to a NPS 16 XHP ST pipeline was determined

1.0-Ottawa-5

Reference: Exhibit B, Paragraph 61

Citation: Table 11

Why is replacement being recommended then the existing pipelines will continue to have the highest AHI rating until 2041?

2.0-Ottawa-6

Reference: Exhibit B, Paragraph 8

Citation: “Enbridge Gas’s Distribution Integrity Management Program (DIMP) continually evaluates assets to identify hazards and assess risks to help ensure gas distribution assets remain suitable and fit for continued service.”

Please detail all safety concerns Enbridge has with the existing pipelines and what mitigation options exist to address those concerns?

2.0-Ottawa-7

Reference: Exhibit B, Paragraph 11

Citation: “...Records indicate inadequate cathodic protection up to the mid-1970s which has resulted in increased corrosion rates of the pipeline leading to leaks.”

What is the estimated gas leakage rate in the current lines? Please indicate in cubic meters per year.

2.0-Ottawa-8

Reference: Exhibit B, Paragraph 31

Citation: “If the quality of field applied coatings is [sic] compromised, pipe coatings can soften, flow or become cracked and brittle, resulting in disbonded and ineffective coating which could lead to corrosion problems.”

Could cathodic protection be enhanced to reduce operational risk and increase the service life of the existing pipelines?

2.0-Ottawa-9

Reference: Exhibit B, Paragraph 36

Citation: “As part of Enbridge Gas’s regular bridge crossing inspection program...”

When was Enbridge first aware of corrosion at this location? Were there inspections prior to 2016 and if so, what did the inspections report? Please provide all inspection reports.

2.0-Ottawa-10

Reference: Exhibit B, Paragraph 62

Citation: Table 12

1. Would operating any of the pipelines at lower pressure, capacity or annual throughput extend their service life? If so, please provide an itemized list.
2. Would operating any of the pipelines at lower than current pressure enhance safety or reduce leak volume?
3. If the gas demand in the area of the proposed work drops by 90% by 2050, will all the proposed new infrastructure remain operable? How would this impact cost recovery for the project?

3.0-Ottawa-11

Reference: Exhibit B, Paragraph 68

Application: Table 13

Please answer the following:

1. If the gas demand in the area of the proposed work drops by 90% by 2050, how would this impact cost recovery for the proposed project?
2. Will this proposed project directly or indirectly increase Enbridge's corporate earnings over the life of the asset? If no, please explain. If yes, please provide the forecasted impact.

4.0-Ottawa-12

Reference: Exhibit B, Paragraph 62

Citation: Table 12

1. Have climate change resiliency impacts been taken into account in the proposed design and work?
2. Will the proposed replacement result in greater energy efficiency?

4.0-Ottawa-13

Reference: Exhibit B, Paragraph 71

Citation: Table 14

1. What is the maximum rate of hydrogen blending possible i) in the existing lines and ii) in the proposed new lines?
2. Will any measures be taken to reduce or eliminate greenhouse gas emissions during the proposed replacement? If so, Enbridge is asked to detail them.

5.0 Ottawa-14

Reference: Exhibit B, Paragraph 71

Citation: Table 14

1. What compensation if any, will be offered to residents and businesses impacted by the proposed work?
2. What impact will the proposed new pipelines have on right of way capacity to carry other infrastructure?

6.0-Ottawa-15

Reference: Exhibit F, 3rd Paragraph on Page 2 of 8

Citation: “Based on the Crown’s...affected by the project”

Was the Crown advised that the proposed work relates to infrastructure in Quebec?

7.0-Ottawa-16

Reference: Exhibit B, Paragraph 74

Citation: “Accordingly, this Updated Application is requesting leave to construct approval for the Updated Phases 3 and 4 of the Project.”

1. Will gas supply capacity be reduced during the proposed work? If so, please provide an itemized list of capacity reductions as required
2. What contingency is in place if the proposed replacement results in a loss of service?
3. What at contingency is in place if the proposed replacement results in a major gas leak or damage to other infrastructure?

7.0-Ottawa-17

Reference: Exhibit B, Paragraph 75

Citation: “With leave of the Board, Enbridge Gas Expects to commence construction of the Project in March of 2022.”

1. If approved, how will the community be notified of the work? Will this be done in both official languages? Will Enbridge have a bilingual communications officer available for this proposed project at all times?
2. If approved, how will City of Ottawa be compensated for staff time related to addressing public concerns or redirecting traffic and/or transit service or any other documented costs related to this project?

Filed and Served on November 22, 2021