**EB-2020-0293**

**ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** an Application by Enbridge Gas Inc. for an order granting leave to construct in the City of Ottawa, under section 90 of the Act.

**AND IN THE MATTER OF** an Application by Enbridge Gas Inc. for an order approving the forms of Working Area Agreement and Transfer of Easement agreement, under section 97 of the Act.

# INTERROGATORIES

# ON BEHALF OF THE

# SCHOOL ENERGY COALITION

**SEC-01**
[Ex. B-1-1, General] Please provide all scenario and other analyses done by the Applicant that quantify the effect on a) load served by the subject pipeline, or b) net present value of the project, of increases in the cost of carbon, including without limitation any analyses that use higher or lower assumed carbon costs than the $170 per tonne figure currently announced by the federal government.

**SEC-02**
[Ex. B-1-1, p.3] Please provide a list of all materials, studies and reports related to vintage steel distribution gas mains that were consulted and produced for DIMP and AHR.

**SEC-03**
[Ex. B-1-1, p.4] Please provide an evidence reference to a Board proceeding for the DIMP and AHR conclusions relating to the three named vintage steel pipelines. For each the two named pipelines other than this one "requiring further investigation", please provide details of the planned or completed replacement project, including timing, length, cost, and any major problems that arose either prior to or during the project. In each case, if there was or is a leave to construct application, please provide the case reference.

**SEC-04**
[Ex. B-1-1, p.4] Please confirm that the current AMP and USP are those contained in EB-2020-0181 Exhibits C/2/1 and C/1/1 respectively, as modified by EB-2021-0148 Exhibit B/2/3. If not confirmed, please provide a complete and up to date AMP and USP.

**SEC-05**
[Ex. B-1-1, p.5, 13, 42] Please provide a summary of leak data for the subject pipeline. Please provide any other documents or information that shows direct evidence of integrity problems in the subject

pipeline, other than the information already filed in the Application. Please confirm that Table 11 predicts 4.3 leaks in the next twenty years, 13 leaks in the next thirty years, and 36.8 leaks in the next forty years, in each case cumulative numbers.

**SEC-06**

[Ex. B-1-1, p.6] Please provide details of all current or proposed plans, of which the Applicant has any knowledge, to replace, or to materially alter, the Cliff Street Heating Plant, the TransAlta Cogen, or the heating plants for the RCMP Headquarters and the University of Ottawa.

**SEC-07**

[Ex. B-1-1, p.13] Please provide the total length of the St. Laurent Pipeline and confirm that all of the 37 km XHP ST Natural Gas Mains referred to in Table 3 are part of the St. Laurent Pipeline. If not confirmed, please provide details of the application of Table 3 to the subject pipeline.

**SEC-08**

[Ex. B-1-1, p.14] With respect to the fact that there is no in-line inspection of the St. Laurent Pipeline:

1. Please justify with evidence the assumption that locations outside of the roadway would be a representative sample of the entire St. Laurent Pipeline.
2. Please confirm whether pipeline locations outside of the roadway expose to different conditions from those under the roadway and explain how does Applicant's assessment method account for the differences.
3. Please provide the total length of portions of pipeline that the Applicant inspected, directly or indirectly.
4. Please advise whether items c, d, and e on page 14 have been addressed already, or whether it is intended they be addressed in this project.

**SEC-09**

[Ex. B-1-1, p.18] Please advise whether the photos are of the problems on the subject pipeline, or are from an unrelated pipeline.

**SEC-10**

[Ex. B-1-1, p.22] Please advise the extent to which the damage the Applicant "is currently not aware of" is a factor in the proposal to replace the subject pipeline.

**SEC-11**

**[**Ex. B-1-1, p.42, 45**]** Please provide the annual actual number of asset failures occurred to the assets reviewed under AHI in the past 10 years.

**SEC-12**

[Ex. B-1-1, p.45] Please provide annual actual cost of repairs on the St. Laurent Pipeline in the past 10 years.

**SEC-13**

[Ex. B-1-1, p.46-7] Please re-do the cost comparison on the assumption that the pipeline's useful life is 20 years rather than 40 years. Please advise the annual costs (revenue requirement) of this LTC project included in rates if it is assumed that the expected useful life is 20 years.

**SEC-14**

[Ex. B-1-1, p.47] Please provide the quantification of the secondary impacts in Table 12 that show that the Replace Option is more economic than the Repair Option.

**SEC-15**
**[**Ex. B-1-1, p.45 and Ex. D-1-1, P.10**]** Please explain the difference between the total project cost provided in Table 13 on Exhibit B Tab 1 Schedule 1 Page 45 and Table 9 on Exhibit D Tab 1 Schedule 1 Page 10.

Respectfully submitted on behalf of the School Energy Coalition this November 22, 2021.

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Jay Shepherd
Fred Zheng
Counsel for the School Energy Coalition