

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

December 3, 2021

**EB-2021-0205 – Greenstone Pipeline Leave to Construct
Pollution Probe Interrogatories to Applicant**

Dear Ms. Long:

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

Respectfully submitted on behalf of Pollution Probe.



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

ONTARIO ENERGY BOARD

**Enbridge Gas Inc.
Greenstone
Leave to Construct**

POLLUTION PROBE INTERROGATORIES

December 3, 2021

**Submitted by: Michael Brophy
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28 Macnaughton Road
Toronto, Ontario M4G 3H4**

Consultant for Pollution Probe

PP-1

[Exhibit A, Tab 2]

- a) When was the Greenstone Pipeline project first identified by Enbridge?
- b) Please provide a copy of the initial letter from the customer (i.e. Greenstone Gold Mine or owner) to Enbridge requesting natural gas to supply.
- c) The Public Consultation materials for the project indicated that the project would be constructed in 2017 (reference Exhibit F, Tab 1, Schedule 1, Attachment 1, Appendix B5). Please explain the delay in proposed construction to 2022.

PP-2

[Exhibit A, Tab 2]

- a) Please describe any local distribution system benefits resulting (to that are likely to result) from this project other than the benefit of serving the Greenstone Gold Mine.
- b) Please identify any other planned projects related to the Greenstone distribution system.

PP-3

[Exhibit D, Tab 1, Schedule 1, Table 1]

- a) Please confirm that the scope of the Leave to Construct is limited to OEB approval to construct 13 kilometers of NPS 6 XHP ST. If not correct, please provide the scope for Leave to Construct purposes.
- b) Please confirm what project components and related costs from Table 1 are in scope for the OEB Leave to Construct approval.
- c) Please provide a similar breakdown to Table 1 for the original estimated project costs of \$3,655,000 (reference: EB-2020-0181, Exhibit C, Tab 2, Schedule 1, page 381).
- d) Please explain the variance in project capital estimate between the Asset Management Plan estimated costs of \$3,655,000 (reference: EB-2020-0181, Exhibit C, Tab 2, Schedule 1, page 381.) and the current project estimate of \$5,523,788.

PP-4

[Exhibit D, Tab 1, Schedule 1, Table 1]

- a) Please explain why the CIAC is not required to cover the full project costs.
- b) Please explain why Ratepayers should pay for \$5,523,788 of capital when the project is entirely for one customer.
- c) How would the Ratepayer funded portion of this project be treated if the mine ceases to be a gas customer and the project becomes a stranded asset?

PP-5

[Exhibit D, Tab 1, Schedule 1]

- a) Enbridge indicates that a contingency of 14.4% is applied to the project due to its risk profile. Please describe the project risk profile and how it related to the proposed contingency rate.
- b) Please provide a list of the similar projects with a similar contingency reviewed and approved by the OEB.

PP-6

[Exhibit D, Tab 1, Schedule 1]

- a) Please confirm that the contract with the Greenstone Gold Mine is a 10 year contract.
- b) What is the proposed amortization period for the proposed pipeline?
- c) How will the remaining amortization period be treated if the Greenstone Gold Mine ceases consumption at the end of year 10.
- d) Please identify the cost that will need to be recovered from Ratepayers if the scenario in part 'c' occurs.

PP-7

[Exhibit F, Tab 1, Schedule 1]

- a) Please provide any updated OPCC or permitting agency correspondence received which was not included in the application.
- b) Please provide a list of all OPCC and permitting agencies consulted and provide a column to indicate which parties have provided correspondence confirming approval and/or completed review of the project.
- c) Does Enbridge have all permits related to the wetlands and watercourse crossing for this project? If not, please provide details on the outstanding permits/approvals and when they are expected to be received.

PP-8

[Exhibit F, Tab 1, Schedule 1, Attachment 1, Page 3.6]

Reference: "During the August 24, 2015 meeting held with the Municipality, representatives identified safety, routing, and permit requirements and expressed concern regarding the development of a pipeline in the areas to the east and west of Geraldton characterized by wetlands."

Please provide details on how the municipal issues raised related to safety, routing, permits and wetland impacts have been resolved.

PP-9

[Exhibit F, Tab 1, Schedule 1]

"An Environmental Protection Plan ("EPP") will be developed for the Project prior to construction."

- a) Please explain why the EPP was not completed and filed in support of OEB approval in this application.
- b) If the EPP has not been conducted, please provide details on how Environmental and Socio-economic mitigation measures costs were calculated for the proposed project.