



EPCOR Natural Gas Limited Partnership

Application for a new Certificate of Public
Convenience and Necessity for the Municipality of
Brockton, the Municipality of West Grey, and the
Township of Chatsworth

EB-2021-0269

Responses to JAKO Developments Inc. Interrogatories

December 13, 2021

1. Preamble:

In reviewing Appendix F, it would be our understanding that homes and farms on the east edge of Grey Road 3 would be served with this natural gas expansion. However, we note that our property is 1800 meters east of the Grey Road 3 proposed area of service.

As a local resident of West Grey, my personal suggestion would be to amend the area to be served. The NORTH, WEST, and SOUTH boundaries could remain the same to avoid conflict of service. The EAST boundary, if adjusted, could move to the Mulock Road, 4 kilometers east. The addition of 4000 meters of gas line along the south limit would allow service to over 8000 acres of properties.

Questions:

Would EPCOR be able to include our subdivision within the current West Grey Certificate of Public Convenience and Necessity?

Would EPCOR consider the suggested alteration to their West Grey CPCN to include these potential customers for natural gas service?

ENGLP Response:

ENGLP notes that the funding it obtained for the Municipality of Brockton Project under the Phase II Natural Gas Expansion Program is specifically in respect to the areas of the proposed project and is only sufficient to cover those areas. ENGLP's ability to connect customers outside of the proposed project areas would be subject to the OEB's EBO 188 Guidelines¹ under which a standard test for economic feasibility would be required for these connections, which may potentially result in the requirement for an aid to construction contribution from the customer(s) in order to connect to ENGLP's system. While ENGLP has had conversations with residents of the area (including the letter of comment from Mr. James Cooke as part of this hearing)², ENGLP does not have sufficient detail as would be required to complete the required financial feasibility analysis related to providing service to these areas.

Further, as these areas were not part of ENGLP's proposal for the Municipality of Brockton Project under the expansion Phase II Natural Gas Expansion Program and they are part of Enbridge's existing CPCN, ENGLP notes that it would be necessary to first confirm that ENGLP is best suited to service these additional areas. ENGLP believes that, upon approval from the OEB to proceed

¹ Distribution System Expansion Report (E.B.O. 188), January 30, 1998. Appendix B

² J Cooke_ Letter of Comment _EPCOR_20211115_Redacted

with the Municipality of Brockton Project, it's likely it would best suited to service these additional areas based on the location of its planned infrastructure for the proposed project. Unfortunately, ENGLP does not have knowledge as to Enbridge's plans for the area to be able to confirm this is the case.

Where requests for service can be achieved within the EBO 188 Guidelines³, ENGLP is supportive of providing natural gas service to additional underserved communities in the area and would welcome the OEB expanding the proposed CPCNs to allow it to do so. Further, ENGLP notes that the inclusion of these areas as part of this Application would reduce the associated regulatory burden involved with filing a stand-alone application in the future.

All of which is respectfully submitted.

³ Distribution System Expansion Report (E.B.O. 188), January 30, 1998.