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

December 17, 2021

**EB-2021-0148 – Enbridge 2022 Incremental Capital Module
Pollution Probe Interrogatories to Applicant**

Dear Ms. Long:

In accordance with Procedural Order No. 1 for the above-noted proceeding, please find attached Pollution Probe's Interrogatories to the Applicant.

Please reach out to the undersigned should you have any questions.

Respectfully submitted on behalf of Pollution Probe.

Michael Brophy, P.Eng., M.Eng., MBA
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cc: Enbridge (via EGIRegulatoryProceedings@enbridge.com)
David Stevens, Aird & Berlis (via email)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

**Enbridge 2022 Rates Phase 2
Incremental Capital Module**

POLLUTION PROBE INTERROGATORIES

December 17, 2021

**Submitted by: Michael Brophy
Michael Brophy Consulting Inc.
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Phone: 647-330-1217
28 Macnaughton Road
Toronto, Ontario M4G 3H4

Consultant for Pollution Probe**

Pollution Probe #1

[Ex. A, T2 Sch. 1]

For the five proposed ICM projects, please provide a table with the following information for each project.

- Project name
- Description of 'Project' scope (i.e. facilities included)
- Project costs
- Costs incurred to-date for the project
- Proposed in-service date (or actual if already in-service)
- Status and case number of the Leave to Construct application or approvals (if applicable)
- Variance explanation if 'Project' scope in ICM proceeding is different than the scope outlined in the Leave to Construct (if applicable)
- Overhead amount
- Project Contingency percentage
- The amount of any Project costs approved by the OEB prior to this proceeding

Pollution Probe #2

[Ex. A, T2, Sch. 1]

- a) Please confirm that ICM approval for one or more of the 2022 proposed ICM projects only provides Enbridge the ability to capitalize the project(s) and does not represent OEB approval of the project itself (i.e. a separate Leave to Construct is required to review and approve the project in more detail). If this is not correct, please explain.
- b) In Enbridge's opinion is it preferred to receive ICM (or equivalent rate case) approval and then apply for Leave to Construct approval, or the other way around? Please explain the answer.
- c) Please confirm that if Enbridge does not receive ICM approval for one or more of the proposed projects, Enbridge will not build the project(s). If not correct, please explain.

Pollution Probe #3

[Ex. A, T2, Sch. 1]

- a) Please provide a copy OEB criteria requiring a project to need a Leave to Construct application.
- b) Please provide an explanation of what Leave to Construct criteria trigger the requirement for St. Laurent Phase 3 to require a Leave to Construct application.

Pollution Probe #4

[Ex. A, T2, Sch. 1]

- a) Please explain the impacts if an ICM approval is given to a project and then the OEB rejects the project through the following Leave to Construct proceeding.
- b) Please explain the impacts if an ICM approval is given to a project and then it is determined that an IRP alternative is more appropriate to meet consumer needs.

Pollution Probe #5

[Ex. A, TX, Sch. X]

For each proposed 2021 ICM project, please describe the impact if it were deferred to 2024 (rebasng).

Pollution Probe #6

[Ex. A, TX, Sch. X]

- a) Please confirm that the St. Laurent pipeline provides gas supply to customers outside Ontario.
- b) Please confirm what total percentage and GJ (or equivalent m3 volume) flowing through the St. Laurent pipeline are consumed by:
 - Customers in Ottawa
 - Customers in Ontario
 - Customers outside Ontario

Pollution Probe #7

[Ex. B, T2, Sch. 1]

Reference: “The capital expenditures of the projects for which Enbridge Gas is seeking ICM funding approval for the EGD rate zone and Union rate zones are prudent and represent the most cost effective option for ratepayers”

- a) Please provide a copy of the prudence test that was used to assess the projects and the results of the assessment for each project.

Pollution Probe #8

[Ex. B, T2, Sch. 1, Appendix A]

Reference: General Plant Capital Expenditures¹ by Category (2017-2026)

Please explain the primary reasons for the 58% increase in proposed capital spending from the most recent 2020 actual (\$51.3 million) and the proposed 2022 (\$81 million) budget.

Pollution Probe #9

[Ex. B, T2, Sch. 2]

Reference: Kirkland Lake Business Case

- a) Please provide details on all IRP alternatives assessed for the proposed Kirkland Lake project.
- b) Please provide a signed contract or other documentation providing firm commitments to support the statement that there is “expected growth with Macassa Mines as well as future demand in Kirkland Lake”.
- c) Please provide all documentation and analysis that supports a “like for like” replacement instead of the ability to decrease the proposed pipeline.

Pollution Probe 10

[Ex. B, T2, Sch. 2]

- a) Please explain why the St. Laurent Phase 3 project was withdrawn from the request for ICM treatment in 2021.
- b) Please explain why it is appropriate to reinstate the St. Laurent Phase 3 project for potential ICM consideration for 2022.
- c) Is the St. Laurent Phase 3 a stand-alone project or is it combined with Phase 4 to form a single project?
- d) If the St. Laurent Phase 3 project is a stand-alone project, please explain the project scope in the Leave to Construct [EB-2020-0293]
- e) Please reconcile the estimated project costs for the St. Laurent Phase 3 project in this proceeding (i.e. amount for ICM treatment) against the proposed project costs in the Leave to Construct proceeding for the same project.

Pollution Probe #11

[Ex. C, T1, Sch. 1]

- a) Please confirm when the updated AMP was completed.
- b) What updates related to IRP have been included since the last version of the AMP?
- c) Please identify how Enbridge's IRP alternative assessment commitments have been met in the updated AMP.