

SCOTT POLLOCK
T 613.787.3541
spollock@blg.com

Borden Ladner Gervais LLP
World Exchange Plaza
100 Queen St, Suite 1300
Ottawa, ON, Canada K1P 1J9
T 613.237.5160
F 613.230.8842
blg.com



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December 17, 2021

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

Dear Ms. Long

**Re: Enbridge Gas Inc. (“EGI”)
2022 Rates (Phase 2) Application – Incremental Capital Module
Board File #: EB-2021-0148**

Pursuant to Procedural Order No. 1 dated November 29, 2021, we submit the following Interrogatories for EGI on behalf of Canadian Manufacturers & Exporters (“CME”).

Yours very truly

A handwritten signature in blue ink, appearing to read 'Scott Pollock', is written over a light blue horizontal line.

Scott Pollock

enclosure

c. Bonnie Adams (EGI)
David Stevens (Aird & Berlis LLP)
EB-2021-0148 Intervenors
Mathew Wilson (CME)

ONTARIO ENERGY BOARD

Enbridge Gas Inc.

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

AND IN THE MATTER OF an Application by Enbridge Gas Inc., pursuant to section 36(1) of the *Ontario Energy Board Act, 1998*, for an order or orders approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission and storage of gas as of January 1, 2022

**INTERROGATORIES OF
CANADIAN MANUFACTURERS & EXPORTERS (“CME”)
TO ENBRIDGE GAS INC. (“EGI”)**

B-CME-1

Ref: Exhibit B, Tab 2, Schedule 1, page 26 of 35

At page 26, EGI stated that the projects it seeks ICM funding for includes phase 3 of the St. Laurent Ottawa North Replacement.

In a letter dated February 10, 2021 for EB-2020-0181, EGI withdrew its request for phase 3 funding of the St. Laurent Ottawa North Replacement and stated that it would seek funding for both phase 3 and phase 4 of the project in the 2022 ICM application.

- (a) Please describe what has changed with the St. Laurent Ottawa North Replacement project which has caused EGI not to request phase 4 funding in this proceeding.
- (b) CME’s understanding from EGI’s February 10, 2021 letter was that EGI withdrew its request for funding for only phase 3 of the project to address the Board’s concern regarding considering phase 3 from phase 4 funding. Please provide EGI’s reasoning for only requesting phase 3 funding in this application.

B-CME-2

Ref: Exhibit B, Tab 2, Schedule 2, page 2 of 14.

At page 2 and onwards, EGI provides the business case summaries for ICM projects by ratezone. In its business cases for the St. Laurent Ottawa North Replacement and the NPS 20 Replacement Cherry to Bathurst describe potential repair options that were considered.

- (a) With respect to the repair alternatives for these two projects, did EGI quantify the costs of repair, including the associated advantages of spreading capital expenditures over multiple years, and the associated disadvantages of integrity digs and other concerns?
- (b) If the answer to a) is yes, please provide EGI's estimated cost for the repair option for these two projects.
- (c) How does EGI weigh quantifiable aspects of repair versus replace decisions (total cost and timing of costs) against more difficult to quantify attributes of a solution, such as disruption to traffic or constructing pipeline to modern standards?