

VIA E-MAIL

January 6, 2022

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

**RE: EB-2021-0293 – EGI Proposed St. Laurent Replacement
FRPO Request for Fulsome Responses**

FRPO is concerned with the omissions in the responses provided by EGI in the December 13th responses to our interrogatories in the St. Laurent Replacement application. Unlike SEC/ED¹, we cannot produce the type of evidence sought to assist the Board but must obtain the evidence from EGI. We are striving to get our initial inquiries answered as opposed to waiting until the Technical Conference to ask again or in a more refined manner. Asking for this information in the Technical Conference would inevitably lead to undertakings with the only opportunity to ask technical questions of clarification at the Oral Hearing.

Instead, we are striving to provide EGI with specific questions in advance of the Technical Conference to allow due consideration and in some cases, additional data recovery, to reduce Technical Conference undertakings and subsequent clarifications at the Oral Hearing. At this juncture, we would be assisted by information omitted from EGI's IRR's. At a later date, once we have reviewed the information requested below, we will advance questions of clarification on interrogatories that were answered.

- 1) In FRPO.1, we had asked for some mapping of pipelines and provision of simulated pressures. Our inquiry must have been misunderstood as most of the requested mapping information was included in the map attached to ED.16. However, what was not included was the data requested on system pressures before and after the proposed replacement (Winter 2021/22 and Winter 2023/2024). We believe Table 2 in FRPO. 2 provides the simulated pressures at stations inlets for the winter of 2021/22.
 - a) Please confirm that Table 2 in FRPO.2 provides simulated peak day station inlet pressures for 2021/22.
 - b) Please confirm that the NPS 12 pipe that runs north from the Rideau Heights station eventually inter-connects through the Hurdman & Queensway station to the St. Laurent pipeline.
 - c) Please provide a second table that exhibits the peak day station inlet pressures for the stations displayed in Table 2 in a peak-day simulation after the proposed replacement (to simplify, EGI can use the Winter 2021/22 simulated demands assuming the St. Laurent pipe is replaced as per the application).

¹ SEC_Pollution Probe_City of Ottawa_Witness panel_20211229

To be clear, the following questions in 2) were not asked as part of our IR's in FRPO.1 or .2 but we will be asking them in our Technical Conference questions to be submitted in advance. While we could have waited to submit the questions in 2), with our knowledge of simulations, we recognize that it would be efficient to gather all of the data at the time of simulation. It would be helpful if these were provided to us before the Technical Conference but respect that EGI is not compelled to do that.

- 2) Please provide the peak day flows out and outlet pressure of each station for the pre- and post-replacement simulations.
 - i) Please identify any system constraints that would restrict flow capability from the Rideau Heights station to St. Laurent.
 - ii) For the results provided in Table 2 of FRPO.2, what was the simulated pressure setting of the Rideau Heights station feeding the NPS 12 northbound line.
 - (1) If the simulated setting was not 275 psig, please re-run the simulation using 275 psig and provide the resulting pressures and flows at the stations pre- and post-proposed replacement.

- 3) In FRPO.3 and FRPO.5, we asked EGI to file the study(ies). Instead, we received assorted assumptions that answered a few of our questions. We ask again that EGI file:
 - a) The study(ies)
 - b) The report(s) to management
 - c) The technical analysis document(s) and
 - d) Whatever EGI would call the information sources provided by analysts to management that documents the methodologies and assumptions used to determine for both Enbridge Gas and Gazifere:
 - i) the assumptions – e.g., static or transient simulation
 - ii) minimum pressures deemed to prompt an outage
 - iii) methodology and assumptions employed in estimating the costs of:
 - (1) actions for mitigation
 - (2) repair
 - (3) make safe and relight
 - (4) customer claims

- 4) In FRPO.13, we asked for the condition of the St. Laurent pipe to be compared with the recently examined pipelines that Enbridge proposed for replacement. We understand that the Windsor Line and London Lines were not reviewed under the Asset Health Review Process. Nonetheless, we believe the investment of time to use this model to compare lines deemed to need replacement would be helpful to the Board.
 - a) Using the process described in paragraph 58 and 59 and using the data for the respective Windsor and London Lines, please produce the comparison.²

² EB-2020-0181 Asset Management Plan: 2021-2025 pg. 90: A reliability model accounting for pipe attributes has been developed through the Asset Health Review (AHR) program under DIMP to forecast the number of corrosion leaks based on statistical analysis of corrosion leak history from the past 10 years (including factors that accelerate degradation).

5) In FRPO.15, we asked “Please file all internal EGI written communication including reports, emails and memos that relate to the topic of this decision to replace and the timing of the replacement.” While we appreciate that EGI has provided high-level presentations, we asked for reports, emails and memos that relate to the topic of the decision to replace and the timing of the replacement. We respectfully request a more fulsome response.

As noted above, we request that EGI provide the requested omissions in advance of the Technical Conference. We respectfully request the information be provided by January 19th to allow our review and inclusion of any clarifying questions with additional clarifications sought on responses provided December 13th. FRPO will commit to providing our advanced questions for the Technical Conference within 2 business days of receiving the omitted material to encourage earlier provision than January 19th. Earlier provision would increase EGI’s opportunity to review our advanced questions for the Technical Conference for improved efficiency.

We trust that this approach is helpful to the Board in seeking efficiency and effectiveness for the Technical Conference, the Oral Hearing and ultimately in the Board’s determinations.

All of Which is Respectfully Submitted on Behalf of FRPO,

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Interested Parties – EB-2021-0293