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Enbridge Gas Inc.
50 Keil Drive North,
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Canada

February 8, 2022

VIA EMAIL and RESS

Nancy Marconi
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File: EB-2020-0293
St. Laurent Ottawa North Replacement Project
Enbridge Gas Interrogatories to Sponsor Evidence**

In accordance with Procedural Order No.5, enclosed please interrogatories of Enbridge Gas to the Sponsors (City of Ottawa and Ottawa Community Housing) evidence in the above noted proceeding.

Please contact the undersigned if you have any questions.

Yours truly,

(Original Signed)

Adam Stiers
Manager, Regulatory Applications – Leave to Construct

c.c. Guri Pannu (Enbridge Gas Counsel)
Charles Keizer (Torys)
Zora Crnojacki (OEB Staff)
Intervenors (EB-2020-0293)

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

AND IN THE MATTER OF an Application by Enbridge
Gas Inc. for an order granting leave to construct in the
City of Ottawa, under section 90 of the Act.

AND IN THE MATTER OF an Application by Enbridge
Gas Inc. for an order approving the forms of Working
Area Agreement and Transfer of Easement agreement,
under section 97 of the Act.

**WRITTEN INTERROGATORIES OF ENBRIDGE GAS INC. TO
CITY OF OTTAWA AND OTTAWA COMMUNITY HOUSING**

1/2.EGI.1

Issue(s):

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), pp. 83, 120, 136, 158 & 164.

Preamble:

The Sponsors' evidence contains the City of Ottawa's "Energy Evolution - Ottawa's Community Energy Transition Strategy – Final Report", but excludes the supporting appendices dealing with project details, risks and financing.

Appendix F: Project Overviews

Appendix G: Summary of Energy Evolution Projects (2020-2025)

Question(s):

Please place Appendixes F and G from the City of Ottawa's Energy Evolution Plan, onto the record in this proceeding.

1/2.EGI.2

Issues:

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 3

Preamble:

"Mr. Fletcher: While we both have expertise in our fields, our evidence here is not based on our expert opinions. Our role is to provide the Ontario Energy Board with information on the plans by major gas users in Ottawa to reduce their GHG emissions, and in order to do so to reduce their reliance on natural gas to a fraction of their current levels."

Question(s):

- (a) Are the reductions in GHG emissions cited by Mr. Fletcher solely and directly related to natural gas consumption?
- (b) If so:
 - (i) What proportion are a result of natural gas consumption within the area of benefit of the proposed St. Laurent Replacement Project?
 - (ii) What proportion are Corporate City of Ottawa consumers of natural gas vs. all consumers of natural gas?

(c) If not, please provide a detailed breakdown of the various sources of GHG emissions reductions according to source (e.g., natural gas, diesel, fuel oil, etc...).

1/2.EGI.3

Issues:

1.0 – Need for the Project

2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 4

Preamble:

Mr. Fletcher: The City's Energy Evolution program, which is included in the filed materials at page 80, was passed unanimously by Ottawa City Council in October of 2020. It aims to reduce corporate city of Ottawa emissions to zero by 2040 and community wide emissions – that is, emissions from all entities within the City of Ottawa - to zero by 2050.

Question(s):

What specific programs identified in the City's Energy Evolution Program are directly intended to reduce GHG emissions and natural gas consumption by each of 2040 and 2050 for each of the Corporation of the City of Ottawa and all remaining entities within the City of Ottawa (please also provide a detailed breakdown of these remaining entities e.g., private property owners, federal government, institutions etc...)?

1/2.EGI.4

Issues:

1.0 – Need for the Project

2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 4

Preamble:

The City, part of the National Capital Region, acts in concert with the Federal Government's GHG reduction plan in the National Capital Region. Specifically, the Energy Services Acquisition Program (ESAP), sponsored by Public Services and Procurement Canada, is modernizing the District Energy System (DES), which provides heating services to over 80 buildings and cooling services to 67 buildings in the National Capital Region, accommodating more than 55,000 occupants.

Question(s):

- (a) Please provide all documentation showing that the City is working with the Federal government in the National Capital Region.
- (b) What is the nature of the agreement established for these purposes between the Corporation of the City of Ottawa and Federal government? If in writing, please provide a copy of the same and all supporting or related documentation.

1/2.EGI.5

Issues:

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 4

Preamble:

The City, part of the National Capital Region, acts in concert with the Federal Government's GHG reduction plan in the National Capital Region. Specifically, the Energy Services Acquisition Program (ESAP), sponsored by Public Services and Procurement Canada, is modernizing the District Energy System (DES), which provides heating services to over 80 buildings and cooling services to 67 buildings in the National Capital Region, accommodating more than 55,000 occupants. The modernization of the downtown Federal district heating system will eliminate the vast majority of natural gas use on this system.¹

Question(s):

- (a) Is the City of Ottawa an active and official participant in the ESAP? If so, what authority or accountability over ESAP decisions does the City have?
- (b) Is the City specifically involved in the planning and execution of ESAP programs? If so, what authority or accountability over such ESAP decisions does the City have?

1/2.EGI.6

Issues:

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 4

¹ PSPC Presentation, p. 184

Preamble:

Translating those GHG reduction targets to natural gas usage reductions means that, by 2050, renewable natural gas is expected to provide approximately 12% of the city's energy requirements, versus the 50% which is provided by fossil derived natural gas currently.²

Question(s):

Please set out all calculations used to derive these conclusions and if based on a model please produce the model with all formulae intact (e.g. a working Microsoft Excel document)?

1/2.EGI.7

Issues:

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 5

Preamble:

Between 2012 and 2020, corporate emissions decreased by 43%, already exceeding the short-term target to reduce emissions by 30 per cent below 2012 baseline levels by 2025. (Figure 6, P20-21 of CCMP).

Question(s):

Please provide a breakdown of GHG emission reductions making up the 43% cited by source (e.g., natural gas, diesel, fuel oil, etc...).

1/2.EGI.8

Issues:

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 5

Preamble:

The following table is a reproduction of Table 15 from Energy Evolution, which shows the programs that are already or will be undertaken from 2020 to 2025 in the building sector.

² Figure 9 and Figure 10 of Energy Evolution, p. 121

Question(s):

Please provide an amended version of the table cited within the Sponsors' evidence with additional columns breaking out the Cumulative GHG Reductions into each of 2020-2022 (actuals) and 2023-2025 (forecasted) and further broken down according to source (e.g., natural gas, diesel, fuel oil, etc...).

1/2.EGI.9**Issues:**

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 6

Preamble:

In long run the City of Ottawa has identified and adopted 39 GHG reduction programs in order to achieve the 100% reduction objective.

Question(s):

Please provide a list of the 39 programs:

- (a) identifying programs that have been implemented and their current status including actual GHG reductions achieved;
- (b) identifying, for those programs not yet implemented, the City's expected implementation date (as approved by Ottawa City council);
- (c) identifying which of the programs (either previously implemented or not yet implemented) are forecasted to reduce natural gas consumption volumes;
- (d) identifying the volume of GHG emissions reductions forecasted for each program according to source (e.g., natural gas, diesel, fuel oil, etc...); and
- (e) identifying the specific nature and street addresses of buildings targeted by each program.

1/2.EGI.10**Issues:**

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 6

Preamble:

Among the top five actions include retrofitting residential buildings, which includes retrofitting pre- and post-1980 homes, low rise residential and apartment building heat

pumps buildings, and retrofitting commercial buildings, which includes retrofitting commercial, office, residential buildings and commercial building heat pumps.

Question:

Please provide additional details regarding this program:

- (a) When was the program approved by Ottawa City council and was that approval for the full program scope contemplated herein?
- (b) What is the full budget of the program? How much of this budget has been funded to date? How much has been spent on this program to date?
- (c) When was the program implemented?
- (d) Please provide any and all progress reports related to this program.
- (e) Please provide all corporate memos, correspondence and/or presentations that provide an indication of results.

1/2.EGI.11

Issues:

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 7

Preamble:

Lastly, the City of Ottawa has also applied for and received COVID stimulus funding, which will be used to improve energy the performance of city buildings. Related to gas consumption, we will be installing ultra-high-performance windows as part of this project.

Question(s):

- (a) Has the City received the funding cited?
- (b) Please provide details of the funding, including any conditions placed upon the City in relation to how funds are spent?
- (c) On how many buildings will the windows be replaced and what is the ratio of window replacement to the relative reduction in natural gas use?

1/2.EGI.12

Issues:

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 9

Preamble:

Within the area serviced by the St. Laurent Pipeline, OCH operates 78 buildings consisting of 5,974 units. The total current consumption of natural gas by these units is 7,924,281, and OCH expects to reduce that to zero by 2040 through aggressive implementation of its current plan.

Question(s):

- (a) Please specify the units of natural gas that OCH is referring to in the above noted quote.
- (b) Please provide the street addresses for each of the 78 buildings cited.

1/2.EGI.13

Issues:

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 183

Question(s):

- (a) Please provide the street addresses for each of the buildings cited by the City.

1/2.EGI.14

Issues:

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 9

Preamble:

Mr. Fletcher: Bruyere Continuing Care is a healthcare organization with three sites providing continuing care, palliative care, and other health care and assisted living services to almost a thousand patients/residents at any given time. They have more than 875,000 square feet of space under their management, more than two thousand staff and six hundred volunteers. They are a major natural gas user for space and water heating. In their letter, they confirm that they are onside with the City's plans to reduce emissions and reduce natural gas use.

Question(s):

- (a) Please describe the relationship between Bruyere Continuing Care (“BCC”) and the City of Ottawa as it relates to energy consumption and managing emissions reductions.
- (b) What authority or accountability over BCC decisions regarding natural gas consumption does the City have?
- (c) Is the City specifically involved in the planning and execution of BCC programs? If so, what authority or accountability over such BCC decisions does the City have?
- (d) Is there additional information available to confirm the current status of the BCC’s natural gas reduction plans (such as, timing of implementation, funding sources, programming details, etc...)? If so, please provide that information.

1/2.EGI.15

Issues:

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors’ Evidence (January 17, 2022), p. 9

Preamble:

The University of Ottawa is another such organization. I am aware that their GHG and fossil fuel reduction plans, while still evolving, are in line with the targets and directions of the City.

Question(s):

- (a) Please describe the relationship between the University of Ottawa and the City of Ottawa as it relates to energy consumption and managing emissions reductions.
- (b) What authority or accountability over University of Ottawa decisions regarding natural gas consumption does the City have?
- (c) Is the City specifically involved in the planning and execution of University of Ottawa programs? If so, what authority or accountability over such University of Ottawa decisions does the City have?
- (d) Is there additional information available to confirm the current status of the University of Ottawa’s natural gas reduction plans (such as, timing of implementation, funding sources, programming details, etc...)? If so, please provide that information.

1/2.EGI.16

Issues:

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 4

Preamble:

Mr. Fletcher: The City's Energy Evolution program, which is included in the filed materials at page 80, was passed unanimously by Ottawa City Council in October of 2020. It aims to reduce corporate city of Ottawa emissions to zero by 2040 and community wide emissions – that is, emissions from all entities within the City of Ottawa - to zero by 2050.

Question(s):

- (a) Please provide in detail the specific contingency plans the City of Ottawa has to ensure the continued safe, reliable and sufficient delivery of energy to meet the needs of its residents, businesses, and all other buildings currently served by the St. Laurent pipeline system if the targets set out in the city's "Energy Evolution - Ottawa's Community Energy Transition Strategy – Final Report" are not achieved as planned?
- (b) Have these contingency plans been reviewed and approved by Ottawa City council? Please provide all corporate memos, correspondence and/or presentations that detail the contingency plans.

1/2.EGI.17

Issues:

- 1.0 – Need for the Project
- 2.0 – Project Alternatives

Reference:

EB-2020-0293 Sponsors' Evidence (January 17, 2022), p. 4

Preamble:

Mr. Fletcher: The City's Energy Evolution program, which is included in the filed materials at page 80, was passed unanimously by Ottawa City Council in October of 2020. It aims to reduce corporate city of Ottawa emissions to zero by 2040 and community wide emissions – that is, emissions from all entities within the City of Ottawa - to zero by 2050.

Question(s):

- (a) Please detail the specific contingency plans the City of Ottawa has put into place to ensure the continued safe, reliable and sufficient delivery of energy to meet the needs of its residents, businesses, and all other buildings currently served by the St. Laurent pipeline system in the event that the existing St. Laurent pipeline system experiences a serious failure and prolonged outage during peak winter design conditions (or the coldest period of the year)?

(b) Have these contingency plans been reviewed and approved by Ottawa City council? Please provide all corporate memos, correspondence and/or presentations that detail the contingency plans.