

ONTARIO ENERGY BOARD

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.

**INTERROGATORIES
ON BEHALF OF THE
SCHOOL ENERGY COALITION**

[General, also p.5]

Please provide a detailed description of the ways in which the Applicant included planning reductions in use by major customers in its forecast of the future need for the St. Laurent pipelines. Please provide the original working papers, including all documents, memos, spreadsheets, models, and other materials that forecast declining use by major customers, and/or the impact of that declining use on the over forecast of total and peak demand on the St. Laurent pipeline.

[p.3]

Reference: “Using the best-case scenario of removing load from the end of the network/system, a reduction 32,500 m³/h is required to downsize the NPS 16 portion of NPS 12.”

Please provide a detailed explanation for the above conclusion, and include any data and calculations relied upon.

[p.4, Table 1] Please provide underlying data and calculations relied upon to reach the conclusions in the Table 1.

Respectfully submitted on behalf of the School Energy Coalition this February 8, 2022.

Fred Zheng
Counsel for the School Energy Coalition