

VIA E-MAIL

February 25, 2022

Ontario Energy Board
Attn: Nancy Marconi, Acting 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 Complete Responses**

Introduction

We are writing on behalf of the Federation of Rental-housing Providers of Ontario to seek the Board's assistance with the discovery process in the St. Laurent Replacement Proceeding.

On January 6, 2022, FRPO submitted a letter to the Board requesting more fulsome responses to our original interrogatories submitted November 22, 2021. In spite of EGI's January 11, 2022 letter dismissing our request as baseless, the Board's PO No. 5, issued January 13, 2022, directed EGI to answer the questions outlined in our aforementioned letter as early as possible but no later than February 22, 2022.

Provided Responses are Lacking Requested Evidence to Inform the Board

In its responses provided February 22, 2022, EGI provided limited additional information in our areas of inquiry and completely omitted some aspects of the questions as if they were not asked. The following are the most significant examples for which we are requesting complete answers:

FRPO.23: This interrogatory was originally FRPO.1 which the Board categorically noted "*that the clarification sought in its first question appears to be straightforward and not burdensome to respond to.*"¹ Yet, in response to our request for the station inlet pressures on a design day under the proposed replacement, EGI provided that "*these station inlet pressures will not change materially following the completion of construction of the Project.*"

With respect, EGI's opinion is not the information we sought. Those requested results are direct evidence of the impact of proposed system vs. the existing system. In the proposal, the system is fundamentally changed with an increase in NPS 16 vs. NPS 12 in conjunction with other changes. The data that was determined from EGI's modelling of a design day to determine the proposed pipe sizing was available to management to approve the applied for project. It is inconceivable that the data could not be provided upon request.

FRPO.24: We asked for the simulated (modelled) outlet pressures and flows. We received neither the pressures (not answered in FRPO.23) nor the requested flows. These are simple values that are generated from consumption data in the system model. There is no extra work involved beyond transcribing the modelled pressures and flows into a table for the purposes of

¹ Procedural Order No. 5, page 3.

evidence. However, in response to this request for flows, no information was provided, nor EGI's reasons for not providing the information.

FRPO.25: This interrogatory was originally FRPO.3 and FRPO.5. The interrogatories were requesting provision of the study to determine the number of customers lost in the respective scenarios of 47 HDD and 1 HDD. **The only type of study or analysis that can determine the loss of customers in this manner is a computer simulation sometimes called a hydraulic model.** The results of the simulation or model are summarized, and likely tabulated, to allow managers to make decisions on sizing and alternatives.

We asked initially for the study in our first attempt and only received a list of assumptions. In our request for fulsome answers, we expanded our wording to include other terms for documentation (provided below for ease of reading) so that we were not provided with a list of assumptions (as initially) or an answer that there was no study because the document was called by a different name.

- 25) 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*

EGI's recent answers are responsive to d iii) only providing information on the determination of the cost of an outage but, again, no reports were provided summarizing the simulation or modelling efforts to determine alternative pipe sizing and ultimately the proposed pipe sizing. FRPO and other parties' concern is the additional length of NPS 16 replacing NPS 12 and, in fact, if the NPS 16 is needed at all **if** the project proceeds. Without the actual data, we and the Board are left with the company's assertion that there is no material change in pressures but somehow a reduction in capacity with an increase in pipe size.² We are seeking the results of those simulations/models that determined these capacities and an understanding of alternatives considered including feeds to Gazifere.

FRPO:28 Distinct from the interrogatories listed above, this interrogatory was submitted to the Reply Evidence. In expecting to get flows and pressures at multiple stations listed in Table 2

² Exhibit I.ED.13a, Exhibit M, page 3

of the initial response to FRPO.2, we believed it would be helpful for all to situate the stations named by cross-streets on a map. In EGI's response, we were directed back to a map in the original application that contained numbers for the stations on a map that has insufficient detail to make out street names. Also, there was no legend to cross-reference station numbers to street names to allow an understanding of their location on the system. We would ask for a map that allows the reader to know the location of stations and to facilitate questions at the Technical Conference.

In our view, all of the above requests are simply a compilation of data and evidence the company has generated to apply for this project and, as such, do not need a significant amount of time to provide the information to the Board. At this point, one can only speculate as to why EGI would not provide the above information after being ordered by the Board to provide.

Request for Technical Experts on EGI Witness Panel

While there are other matters for which we desire clarification, and will seek it in the Technical Conference, complete responses to the IR's above will improve efficiency during the Technical Conference questioning and likely reduce the need for undertakings for which we will not have opportunity to clarify before argument. Further, while we do not know the constitution of the witness panel, we respectfully request that EGI provide witnesses that were involved with the development of pipe sizing through simulation or modelling and witnesses who have expertise in non-destructive examination of pipelines like the St. Laurent piping that EGI is proposing to be replaced.

Relief Requested

FRPO respectfully requests that the Board direct EGI to provide complete answers to the omissions in responses cited above at least 24 hours prior to the Technical Conference scheduled for March 4, 2022. Alternatively, if EGI needs more time to debate this need or provide the requested information, they could provide the Board with alternate dates for the Technical Conference.

All of Which is Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. A. Stiers, EGI Regulatory Proceedings – EGI
Z. Crnojacki – OEB Staff
Interested Parties – EB-2020-0293