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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
Response to FRPO Correspondence February 25, 2022**

Enbridge Gas Inc. (“Enbridge Gas” or the “Company”) is submitting this correspondence in response to the Federation of Rental-housing Providers of Ontario’s (“FRPO”) letter of February 25, 2022 wherein FRPO asserted that Enbridge Gas did not provide complete and sufficient responses to particular FRPO interrogatories. Contrary to the assertions of FRPO, Enbridge Gas has provided complete responses to the interrogatories identified in FRPO’s February 25, 2022 letter.

FRPO 23

FRPO indicates that Enbridge Gas failed to provide requested station inlet pressures on the design day in respect of the proposed replacement. However, in making its submission FRPO has only referred to one part of the question. In Exhibit I.FRPO.23 a) FRPO asked Enbridge Gas to confirm that Table 2 in Exhibit I.FRPO.2 provides simulated peak day station inlet pressures for 2021/22. In response, the Company indicated:

The simulated inlet pressures are peak winter conditions at the time of analysis (2020/2021). The Company does not expect pressures for 2021/2022 to be materially different.

In Exhibit I.FRPO.23 c), FRPO asked for a second table showing the peak day inlet pressures for stations shown in Table 2 in a peak-day simulation after the proposed replacement. In response, the Company stated:

The pipeline replacement was design to meet existing capacity requirements and as such **these station inlet pressures will not change materially** following the completion of construction of the Project. (emphasis added)

Based on this response, the inlet pressures are essentially the same as those already stated in Table 2 of Exhibit I.FRPO.2. Those inlet pressures are set out and the information requested by FRPO has been provided and the response complete. In support of this conclusion, Enbridge Gas will produce a table showing that peak day inlet pressures for stations shown in Table 2 of Exhibit I.FRPO.2 are not materially different. Enbridge Gas will file this additional table within an updated interrogatory response to Exhibit I.FRPO.23 c) in advance of the scheduled Technical Conference.

FRPO 24

According to FRPO, in Exhibit I.FRPO.24, FRPO requested the simulated outlet pressures and flows and asserted that those were not provided without justification. Enbridge Gas interpreted FRPO's sentence leading into the numbered part-questions posed by FRPO as providing context, together with FRPO's further qualification that:

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.

In response, Enbridge Gas stated that:

The NPS 12 northbound line is limited by its MOP of 250 PSIG and cannot be raised to 275 psig.

As a result, the parameters of the request made by FRPO are not physically possible and the simulation was not provided. Accordingly, the Company provided complete responses to FRPO's inquiries for parts (i) and (ii) since those inquiries reflected scenarios that are contrary to reality.

FRPO appears to now indicate that the un-numbered lead-in sentence was meant to be a broad-based request for all outlet pressures and flows. In an effort to avoid further procedural delay and in the interest of regulatory efficiency, Enbridge Gas intends to file an updated response to Exhibit I.FRPO.24 providing peak day flows out and outlet pressures for each station (for the pre-and post-replacement scenarios) in advance of the scheduled Technical Conference.

FRPO 25

In Exhibit I.FRPO.25, which related to Exhibit I.FRPO.3 and Exhibit I.FRPO.5, FRPO sought the study, together with other aspects, that determined the number of customers lost on a 47 HDD and the cost to repair, make safe and relight. In response, Enbridge Gas provided the Schedules attached to this correspondence. This supplemented the information already provided in response to Exhibit I.FRPO.3 and Exhibit I.FRPO.5.

As indicated by Enbridge Gas in its response to Exhibit I.FRPO.25:

The **entirety of the details of the assessments** completed by Enbridge Gas in support of the conclusions drawn within Exhibit B, which are based on the Company's historical experiences mitigating system outages, are set out in Tables 1 and 2 below for a 47 HDD and 1 HDD respectively. (emphasis added)

As noted, all of the details have been provided. There are no additional studies in addition to the information provided in Exhibit B-1-1 regarding customer loss and the information provided in the above responses.

FRPO 28

In Exhibit I.M.2.FRPO.28 b), FRPO requested that Enbridge Gas provide a map showing the locations of the stations including the Rockcliffe Control station. The Company referenced FRPO to Exhibit B-1-1, Figure 1 which is attached to this letter. As requested by FRPO the map shows the locations of the stations. It is important to note that FRPO did not in its original question indicate that cross-streets be identified or provide an explanation of the purpose of the map requested.

FRPO, in its February 25 letter, has now altered its request and is now inappropriately posing a new question while at the same time asserting that Enbridge Gas has not fully responded to the question asked. In an effort to avoid further procedural delay and in the interest of regulatory efficiency, Enbridge Gas intends to file an updated response to Exhibit I.M.2.FRPO.28 b) providing a legend for the map set out in Exhibit B-1-1 Figure 1.

Based on the foregoing, Enbridge has provided sufficient and complete responses to all of the original and additional questions asked by FRPO.

Please contact the undersigned if you have any questions.

Yours truly,

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)