

**EB-2022-0003**

**Enbridge Gas Inc. – Application for leave to construct two natural gas pipelines and associated facilities in the City of Toronto**

**Interrogatories of Environmental Defence**

**Interrogatory # B-ED-1**

Reference: Exhibit B, Tab 1, Schedule 1, Page 1

Preamble:

Enbridge Gas has identified the need to relocate and abandon approximately 154 m of NPS 20-inch HP ST natural gas main. The main must be relocated due to: (i) a conflict with Waterfront Toronto’s PLFPEI project and (ii) termination of the license granted by the City of Toronto allowing Enbridge Gas to utilize the Keating Railway Bridge to support the existing NPS 20-inch natural gas main.

Questions:

- (a) In its application for EB-2020-0198 Enbridge stated that sections of the pipeline in the Kipling Oshawa Loop (“KOL”) near the Don River had been identified as in need of replacement (the “Don River Replacement Project”).<sup>1</sup> Please explain the extent to which this project overlaps with the Don River Replacement Project.
- (b) If this project is approved and constructed, is the Don River Replacement Project still necessary in whole or in part? Please explain.
- (c) If the main did not need to be relocated due to the termination of the licence, when would it need to be replaced due to other reasons (e.g. integrity issues)?
- (d) Please list the dates on which the pipe in question would have been replaced in the various previous iterations of this project.

**Interrogatory # B-ED-2**

Reference: Exhibit B, Tab 1, Schedule 1, Attachment 3, Page 1

Preamble:

“This will also confirm that the City is prepared to permit Enbridge to relocate its pipeline to a permanent location on the Keating rail bridge “utility corridor” on terms and conditions that would be contained in a mutually acceptable long-term license. Among other matters, the license should address a proportionate contribution by Enbridge to the capital maintenance and repair of the utility corridor.”

Question:

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<sup>1</sup> See: EB-2020-1098, Exhibit B, Tab 1, Schedule 1, Pages 4-6.

- (a) Please provide complete details on the “proportionate contribution by Enbridge to the capital maintenance and repair of the utility corridor” that will be provided. If none will be provided, please confirm that was requested.

**Interrogatory # D-ED-3**

Reference: Exhibit D, Tab 1, Schedule 1, Page 1

Questions:

- (a) Approximately when will replacement costs for the proposed pipelines be fully depreciated? Please make and state all assumptions and caveats as necessary.
- (b) How much of the cost of the pipeline replacement will likely remain undepreciated by (i) 2040 and (ii) 2050? Please make and state all assumptions and caveats as necessary.

**Interrogatory # D-ED-4**

Reference: Exhibit D, Tab 1, Schedule 1, Attachment 2, Page 16

Preamble:

Following installation and energization of the temporary above ground by-pass, Enbridge will deenergize and abandon in place the applicable portions of the existing NPS 20 gas main. The abandoned pipe will subsequently be removed and disposed of by Waterfront Toronto as part of the Project.

Questions:

- (a) Please confirm that Waterfront Toronto is only responsible for removing and disposing the abandoned pipe on the existing Keating Railway Bridge.
- (b) Please confirm that Enbridge is responsible for removing and disposing of the abandoned pipe on the Temporary Bypass (i.e., on the decking to be built on the south side of Lake Shore Blvd). If not, please clarify which party is responsible for this work.

**Interrogatory # D-ED-5**

Reference: Exhibit D, Tab 1, Schedule 1, Attachment 2, Page 22

Preamble:

...existing gas mains and services are to be abandoned in place and any subsequent removal and disposal of such abandoned gas mains and services shall be at the sole cost and expense of Waterfront Toronto and prior to such removal Waterfront Toronto shall first confirm the status of such abandonment by contacting Enbridge; [...]

Questions:

- (a) Please confirm whether Waterfront Toronto is responsible for the cost and expense of removing and disposing of abandoned gas mains and services on: (i) the Keating Railway Bridge; and (ii) the Temporary Bypass.
- (b) Please provide a detailed estimate of the cost of removing and disposing of abandoned gas mains and services from: (i) the Keating Railway Bridge; and (ii) the Temporary Bypass.
- (c) Please confirm that the costs to be incurred by Waterfront Toronto to remove and dispose of abandoned gas mains and services will be paid by Waterfront Toronto in addition to the \$5,000,000 Waterfront Toronto is paying as a contribution in aid of construction.

**Interrogatory # C-ED-1**

Reference: Exhibit C, Tab 1, Schedule 1, Page 2

Preamble:

First, once the south half of the Lake Shore Bridge is constructed and widened, the existing NPS 20-inch natural gas main will be relocated temporarily from the Keating Railway Bridge to the south side of Lake Shore Blvd and will run above grade along the newly constructed decking on the south side of the Lake Shore Bridge. This first stage of relocation is referred to as the (“Temporary Bypass”).

Questions:

- (a) Please confirm that the “newly constructed decking on the south side of the Lake Shore Bridge” is being built by and paid for Waterfront Toronto.
- (b) Please explain whether the decking on the south side of the Lake Shore Bridge is being built solely to accommodate the Temporary Bypass.