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Ms. Nancy Marconi
Registrar
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

May 11, 2022

**EB-2022-0003 – Waterfront NPS 20 Leave to Construct
Pollution Probe Intervention Request**

Dear Ms. Marconi:

In accordance with Procedural Order No. 1 for the above-noted proceeding, please find attached Pollution Probe's Interrogatories to the Applicant.

Respectfully submitted on behalf of Pollution Probe.

Michael Brophy, P.Eng., M.Eng., MBA
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Cc: Dave Janisse, Enbridge (via email)
Guri Pannu, Enbridge Legal (via email)
Scott Stoll, Aird & Berlis (via email)
All Parties (via email)
Richard Carlson, Pollution Probe (via: email)

ONTARIO ENERGY BOARD

**Enbridge Gas Inc.
Waterfront NPS 20 Leave to Construct**

POLLUTION PROBE INTERROGATORIES

May 11, 2022

**Submitted by: Michael Brophy
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Phone: 647-330-1217
28 Macnaughton Road
Toronto, Ontario M4G 3H4

Consultant for Pollution Probe**

PP-1

- a) The original Leave to Construct application (EB-202-0198) indicated that urgent relocation of the pipeline was required prior to May 2022. Please explain why that date is no longer relevant and what the latest possible date is for relocating the existing pipeline.
- b) Has any work along the Don River (e.g. Waterfront Toronto, City of Toronto or TRCA) occurred to date? If yes, please explain why the pipeline did not need to be relocated prior to this work.

PP-2

[Ex. A, Tab 2, Sch. 1]

Please confirm that Enbridge will proceed with the project if incremental capital is not provided by the OEB. If that is not correct, please explain.

PP-3

- a) Please explain how the proposed temporary and permanent pipelines requirements relate to the broader scope and timing of flood protection work to be performed along the Don River.
- b) Is it possible that additional relocations will be required for future flood management work along the Don River? Please explain what has been done to mitigate that risk.

PP-4

[Ex. C, Tab 1, Sch. 1]

Please explain why a permanent pipeline cannot be constructed avoiding the impact and expense of a temporary pipeline?

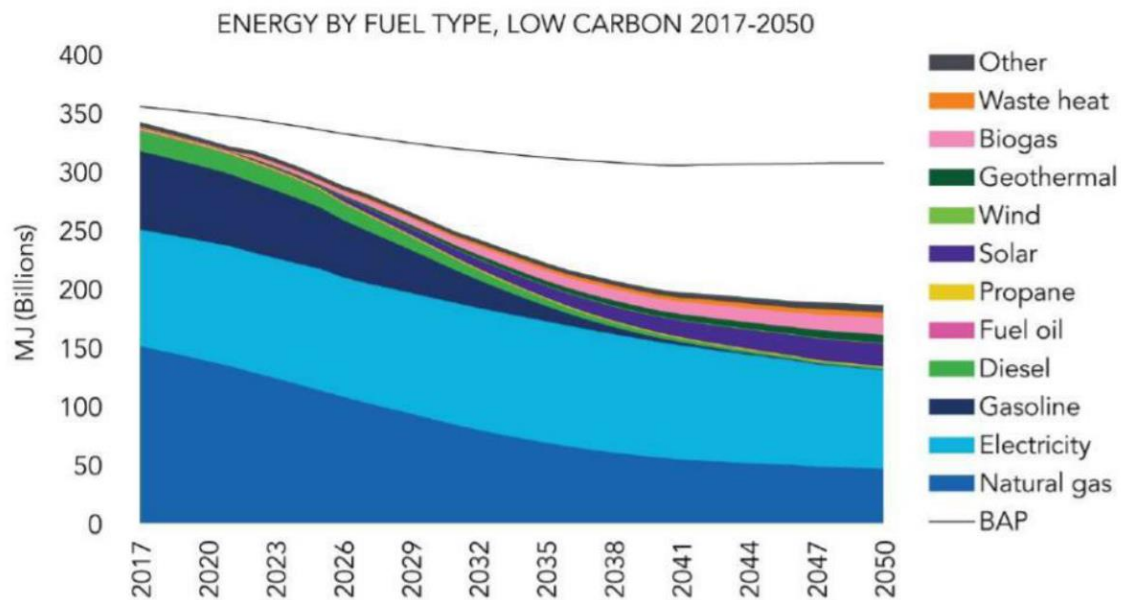
PP-5

Please confirm that the amortization period for the proposed permanent pipeline is 40 years. If incorrect, please indicate the correct value.

PP-6

References: “The existing NPS 20-inch natural gas main forms a critical section of Enbridge Gas’s Kipling Oshawa Loop (“KOL”). It is supplied from the Station B feeder station in the east and it supplies a large area of downtown Toronto with natural gas.” [Ex. B, Tab 1, Sch. 1, pg 2]. “The Project is the best alternative to meet the project need and is in the best interests of ratepayers with respect to Project cost and reliability and quality of gas service to the City of Toronto” [Ex. A, Tab 2, Sch. 1, pg. 3]

City of Toronto Transform TO Report, Figure 33



- a) Has Enbridge conducted a peak demand assessment of the future load for the KOL loop and/or Toronto over the life of the proposed pipeline life (i.e. to 2063)? If not why not. If yes, please provide a copy of all materials and reports related to the demand assessment.
- b) Has Enbridge conducted a recent integrity assessment for the KOL? If no, why not. If yes, please provide a copy of any reports or other materials related to the integrity assessment of the KOL.
- c) Please provide details on any other sections of the KOL that will need to be replaced or relocated from now to 2063.
- d) Has Enbridge considered the proposed decrease in natural gas use in the City of Toronto in its assessment of the proposed pipeline? If yes, please provide a copy of all materials related to this assessment. If no, why not.

PP-7

- a) How will the proposed temporary bypass pipeline be treated from an amortization period and ratepayer cost impact?
- b) Please provide a copy of the Enbridge policy/guideline document(s) or OEB direction that sets the basis for evaluation and financial treatment of proposed temporary pipelines.
- c) Please explain how the financial treatment of the temporary bypass pipeline differs from the proposed treatment of the permanent pipeline.

PP-8

[Ex. B, Tab 1, Sch. 1, pg 2]

Reference: "There are approximately 15,000 customers within the areas primarily supplied by the NPS 20-inch natural gas main at Design Degree Day (41 Degree Day)."

- a) Please explain why the recently approved Lakeshore pipeline and other pipelines feeding downtown Toronto can't be leveraged instead of this pipeline section to serve these customers, particularly if gas demand will decrease in the future.
- b) What IRP alternatives were evaluated to decrease or eliminate the need for this section of pipeline.
- c) Please explain why this project was submitted to the OEB as an individual project rather than a more comprehensive plan on the future needs to provide natural gas to downtown Toronto.

PP-9

[Ex. B, Tab 1, Sch. 1, pg 7]

References: "The proposed Project was identified in Enbridge Gas's Asset Management Plan Addendum, which was filed within the Company's 2022 Rates Proceeding."

- a) Please confirm that the Enbridge Gas Asset Management Plan Addendum, which was filed within the Company's 2022 Rates Proceeding was provided for information purposes and not for OEB review and approval.
- b) Please provide all references in the Gas Asset Management Plan Addendum that relate to this project.
- c) When does Enbridge expect its Asset Management Plan Addendum to be reviewed and approved by the OEB?

PP-10

[Ex. C, Tab 1, Sch. 1]

- a) Has Enbridge conducted any IRP analysis related to the proposed project? If yes, please provide a copy of all material.
- b) Please confirm that the IRP exemption Enbridge references would only be applicable if the OEB provides approval and funding to complete construction within three years. If incorrect, please provide the basis of the exemption.
- c) Please provide a copy of all documentation Enbridge used to assess and decide that this project should be exempt from an IRP assessment.
- d) The OEB IRP Decision (EB-2020-0091) referenced by Enbridge indicates that EGI should conduct IRP pilot projects. Please provide an update on which projects alternatives that have been identified and if any of these could be applied to the City of Toronto.

PP-11

[Ex. D, Tab 1, Sch. 1]

Reference: “The cost estimates set out above includes 30.0% contingency applied to all direct capital and abandonment costs to reflect the preliminary design stage of this Project.”

- a) Please explain why the contingency costs in the project estimate are so high compared to typical Leave to Construct applications.
- b) Please provide project comparatives of contingency costs for other pipelines approved by the OEB.

PP-12

[Exhibit F, Tab 1, Schedule 1]

- a) Please provide any updated OPCC or permitting agency correspondence received which was not included in the application.
- b) Please provide a list of all OPCC and permitting agencies consulted and provide a column to indicate which parties have provided correspondence confirming approval and/or completed review of the project.
- c) Does Enbridge have all permits related to the wetlands and watercourse crossing for this project? If not, please provide details on the outstanding permits/approvals and when they are expected to be received.

PP-13

[Exhibit F, Tab 1, Schedule 1]

“An Environmental Protection Plan (“EPP”) will be developed for the Project prior to construction.”

- a) Please explain why the EPP was not completed and filed in support of OEB approval in this application.
- b) There is significant soil contamination within the study area and specifically along and adjacent to the proposed route for the proposed temporary and permanent pipeline routes. Please describe what activities have been undertaken to assess the level of contamination and what mitigation measures are proposed.
- c) If the EPP has not been conducted, please provide details on how Environmental and Socio-economic mitigation measures costs were calculated for the proposed project.

PP-14

[Exhibit F, Tab 1, Schedule 1, Attachment 1]

Email correspondence is attached in the application that references letters submitted by TRCA. Please provide a copy of the letters submitted by the TRCA.