

ONTARIO ENERGY BOARD

IN THE MATTER OF The *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B; and in particular section 90(1) and section 97 thereof;

AND IN THE MATTER OF an application by Enbridge Gas Inc. for an order granting leave to construct natural gas pipelines in the City of Toronto.

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

1-SEC-1

[General] Please confirm if EGI plans to file ICM application to recover the cost for proposed project. If yes, in what year.

1-SEC-2

[B-1-1 p.2-3; C-1-1 p.9] Please confirm, if the Keating Railway Bridge segment (the 154m segment at issue) of the NPS 20 gas main is disrupted due to construction for 1 to 2 years, then there will be no alternative supplies of natural gas to customers identified in Figure 3.

1-SEC-3

[B-1-1 p.7; C-1-1 p.6] The conflict between the existing natural gas main on the Keating Railway Bridge and the PLFPEI project is identified in 2018 and the deadline for relocation is 2023. The need to relocate the pipeline is identified more than 3 years before its deadline, please explain why EGI does not consider IRP evaluation.

1-SEC-4

[B-1-1 p.7] As the conflict is identified in 2018, please confirm if EGI and Waterfront Toronto have discussed the possibility of allowing EGI to relocate the Keating Railway Bridge segment before the construction of the PLFPEI project.

1-SEC-5

[B-1-1 Attachment 4 p.1; D-1-1 Attachment 1 p.2] EGI's original position regarding the cost responsibility of the project is that Enbridge Gas should be reimbursed for 100% of the project costs while EGI eventually agreed to that Waterfront Toronto will contribute \$5 million, or 21.3%, to the \$23.5 million budget. Please discuss the rationale for supporting EGI's original 100% reimbursement position and justify the \$5 million contribution from Waterfront Toronto.

1-SEC-6

[C-1-1 p.2-3] Please explain whether the permanent relocation of the 154m of NPS 20 gas main to the location of the proposed temporary bypass is possible.

1-SEC-7

[D-1-1 p.1] Regarding project cost and economics, please:

- a. provide explanations specific to this project that justifies the 30% contingency included in the cost estimates;
- b. provide cost details for each item in Table 1;
- c. provide EGI's proposed depreciation plan for the cost of the proposed project;
- d. explain whether EGI will treat any of the cost associated with the temporary bypass as capital expenditure and future rate base for cost recovery purpose?

Respectfully submitted on behalf of the School Energy Coalition this May 12, 2022.

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