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May 12, 2022

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

Dear Ms. Marconi,

**RE: EB-2022-0003 Enbridge Gas NPS 20 Waterfront Relocation Project  
Energy Probe Interrogatories**

Attached are the interrogatories of Energy Probe Research Foundation (Energy Probe) to the applicant in the EB-2022-0003 Enbridge Gas NPS 20 Waterfront Relocation Project Leave to Construct proceeding.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe Research Foundation)  
Dave Janisse (Enbridge Gas Inc.)  
Ljuba Djurdjevic (OEB Staff)  
Ritchie Murray (OEB Staff)

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**EB-2022-0003**

**Enbridge NPS 20 Waterfront Relocation Project**

**Energy Probe Interrogatories**

**May 12, 2022**

**D-Energy Probe-1**

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

- a) Please provide a more detailed table of estimated project costs that separately shows cost components of the following phases of the project: the cost removal of the existing NPS 20, the construction of the Temporary Bypass, the cost of removal of the Temporary Bypass, and the construction cost of the Permanent Relocation.
- b) Will the costs of removal of the existing NPS 20 and of the Temporary Bypass be charged to Accumulated Depreciation? If the answer is no, please explain why not.

**D-Energy Probe-2**

**Reference:** Exhibit D, Tab 1, Schedule 1, Pages 2 and 3, and Attachment 1

**Preamble:** Any portion of the cost of relocation that Enbridge does not recover from Waterfront Toronto, Enbridge will recover from its ratepayers in gas distribution rates. Since Enbridge shareholders will not bear any of the cost, Energy Probe is concerned that Enbridge may not have tried hard enough to get a better deal in its negotiations with Waterfront Toronto.

- a) On which dates did the negotiation meetings that resulted in the agreement with Waterfront Toronto take place?
- b) Please provide the titles of Enbridge representatives at the negotiation meetings and indicate if they had the authority to settle.
- c) How can the OEB be assured that the \$5 million contribution is the best deal Enbridge could make to reach an agreement with Waterfront Toronto?