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BY E-MAIL

May 20, 2022

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Application for Haldimand Shores Community Expansion Project Approval
OEB File Number: EB-2022-0088**

In accordance with Procedural Order No. 1, please find attached OEB staff interrogatories in the above proceeding. The attached document has been forwarded to the applicant and to all other registered parties to this proceeding.

Yours truly,

Original Signed By

Zora Crnojacki
Senior Advisor, Natural Gas Applications

Encl.



OEB Staff Interrogatories

**Application for Haldimand Shores Community Expansion Project
Approval**

EB-2022-0088

May 20, 2022

ISSUE 1.0 NEED FOR THE PROJECT

1.1 Staff.1 Exhibit B, Tab 1, Schedule 1, Attachment 4 “Natural Gas Expansion Study Grafton and Haldimand Shores” Forum Research inc., Research Report prepared for Enbridge Gas Limited, April 2020 (Forum Report)

The survey conducted by Forum Research consisted of 32 door-to-door interviews from a list of 148 households between February 21 and March 15, 2020. The margin of error is +/-15% at the 95% confidence level. The response rate was 22%. The response rate factored in that 37 of the total households were seasonal and excluded from the calculation of the response rate.

The Forum Report lists six communities (including Grafton (Alnwick/Haldimand)-Haldimand Shores) and the results refer to the community of Grafton and Haldimand Shores.

- a) For clarification, please confirm that the survey results used to forecast future customer attachments in Haldimand Shores are based on market research within boundaries of community of Haldimand Shores.
- b) Please provide, on a map, the highlighted streets in which the survey was completed.
- c) Please comment on the acceptability of a 22% response rate. Please compare the 22% to response rates in recent market surveys conducted for or retained by Enbridge Gas for other Phase II community expansion projects?
- d) Please confirm that 148 homes were visited to attempt an interview.
- e) Please describe in detail Enbridge Gas’s outreach activities, plans and/or programs to ensure that the customer attachments will be realized as forecast.
- f) Since the completion of the Grafton and Haldimand Shores market research survey, has Enbridge Gas obtained additional updated information on the interest for switching to natural gas service as part of this community expansion project. Please discuss.

1.1 Staff.2 Exhibit B, Tab 1, Schedule 1, page 5, paragraphs 13 and 14, Table 2: Forecasted Customer Attachments for the Project and Exhibit C, Tab 1, Schedule 1, Page 1, Project Description

The Project consists of approximately 7.3 km of intermediate pressure (IP) NPS 2-inch polyethylene (PE) natural gas pipeline, approximately 385 m of IP NPS 4-inch PE natural gas pipeline and approximately 115 m of NPS 4-inch steel (ST) pipeline which crosses a railway.

Enbridge Gas forecasts the Project’s in-service date to be December 2022. In the table below Enbridge Gas shows forecast attachments over 10 years annually starting in 2022. Enbridge Gas also indicated that the forecasted attachment assumed a 78% capture rate by the end of the tenth year.

Table 2: Forecasted Customer Attachments for the Project

Haldimand Shores Customer Additions	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Total Forecasted
Conversions											
Residential Units (Singles, Semis, Towns)	30	27	10	7	6	7	6	7	6	6	112
Residential Cumulative	30	57	67	74	80	87	93	100	106	112	
Total											112

- a) Please discuss the basis for the forecast 30 customer attachments in 2022. Please discuss the 78% capture rate and explain the methodology to determine this rate. Provide any information used to support this forecast in addition to the Forum Report results.
- b) Please indicate how many connections would be possible if the capture rate were 100% and all the homes in the project location would be connected.
- c) Does the current Project support a 100% connection rate? If not, please provide a description of an alternative project that is designed to support a 100% connection rate and provide the cost breakdown of this alternative.
- d) Does Enbridge Gas know if there are enough certified HVAC service operators locally to convert heating systems and appliances to natural gas to meet forecasted customer attachment each year? Please discuss.

ISSUE 4.0: ENVIRONMENTAL IMPACTS

4.1 Staff.3 Exhibit E, Tab 1, Schedule 1: Environmental Matters and Attachment 2

Enbridge Gas retained Stantec Consulting Ltd. (Stantec) to complete an *Environmental Report: Haldimand Shores Community Expansion Project* (ER). The ER assessed the existing bio-physical and socio-economic environment in the study area, the alternative routes, proposed the preferred route, conducted public consultation, conducted impacts assessment and proposed mitigation measures to minimize the impacts. The ER and the consultation process were conducted in accordance with the *OEB's Environmental Guidelines for Location, Construction and Operation of Hydrocarbon Pipelines in Ontario [7th Edition, 2016]* (OEB Environmental Guidelines).

On January 14, 2022, the ER was made available to the Ontario Pipeline Coordinating Committee (OPCC) for review and comments. The evidence includes a correspondence and tracking of communication with the OPCC up to March 11, 2022.

- a) Please update the filed Correspondence Tracking with the OPCC and specify any new concerns raised since March 11, 2022.
- b) Please describe the status and prospects of resolution of any outstanding concerns raised in the OPCC review prior to March 11, 2022 and after March 11, 2022.

4.1 Staff.4 Exhibit E, Tab 1, Schedule 1, Attachment 2

As part of the environmental assessment process for the Project, in accordance with the *Ontario Heritage Act*, Enbridge Gas is required to complete a *Cultural Heritage Assessment Report* (CHAR) prior to construction and submit it to the Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI) for their review and comment. Enbridge Gas anticipated completion of the CHAR by the end of July 2022. The Project also requires Archeological Assessment Stage 2.

- a) What is the status of the CHAR for the Project and when is the anticipated date of filing the CHAR with the MHSTCI for review?

- b) What is the status of the Archeological Assessment Stage 2 and when is the anticipated date of filing the Archaeological Assessment Stage 2 Report with the MHSTCI for a review?

4.1 Staff.5 Exhibit E, Tab 1, Schedule 1, Attachment 2, Page 2-3 and 19-20,
Northumberland Land Trust

On January 24, 2022, Northumberland Land Trust (NLT) requested that Enbridge Gas commit to a five-year monitoring program to ensure the Project does not result in the spread of invasive species or alternatively, to provide the NLT with monetary compensation to complete monitoring. On February 28, 2022, Stantec responded outlining how the NLT's environmental concerns would be addressed. The response email outlined the proposed construction methods and detailed some of the mitigation and protective measures outlined in the ER. Stantec explained that, with the implementation of the mitigation and protective measures, impacts were not anticipated to be significant.

- a) It is unclear if Enbridge Gas or Stantec responded to the request from the NLT to commit to a five-year monitoring program. Please confirm if Enbridge Gas committed to a five-year monitoring program.
- b) If Enbridge Gas did not commit to a five-year monitoring program, please explain a rationale for this decision. Please file any further communication between Enbridge Gas and the NLT on this matter.

ISSUE 5.0: ROUTE MAP AND FORM OF LANDOWNER AGREEMENTS

5.1 Staff.6 Exhibit F, Tab 1, Schedule 1, pages 1 and 2, paragraphs 4 and 5

Enbridge Gas identified in its application the entities that would require approvals, permits and land easements for location, construction and operation of the Project.

- a) Please provide the status and anticipated time of each permit/approval application and the expected date of acquiring each of the permits.

- b) Discuss any anticipated potential delays that may affect construction schedule for the Project or achieving the forecast number of customer attachments in the first and second year.

ISSUE 6.0 INDIGNEOUS CONSULTATION

6.1 Staff.7 Exhibit G, Tab 1, Schedule 1 and Attachment 5

In accordance with the OEB's Environmental Guidelines, Enbridge Gas contacted the Ministry of Energy (MOE) on August 27, 2021 in respect to the Crown's duty to consult related to the Project. The MOE by way of a letter delegated the procedural aspects of the Crown's Duty to Consult for the Project to Enbridge Gas on October 20, 2021 (Delegation Letter).

In the Delegation Letter the MOE identified ten Indigenous communities that Enbridge Gas should consult in relation to the Project. Enbridge Gas provided the MOE with its Indigenous Consultation Report (ICR) for the Project on March 11, 2022. To date, Enbridge Gas has not filed with the OEB a letter from the MOE indicating that it reviewed the ICR and that, in its opinion, the procedural aspects of consultation undertaken by Enbridge Gas to date are satisfactory (Letter of Opinion).

- a) Please update the logs on Indigenous consultation activities since March 11, 2022. Please summarize any issues and concerns that each of the engaged Indigenous communities raised since March 11, 2022.
- b) If any issues were raised, please describe Enbridge Gas's plans, actions and commitments to address these concerns, resolve the outstanding issues and provide accommodation.
- c) Please update the evidence with any correspondence between the MOE and Enbridge Gas after March 11, 2022 regarding the MOE's review of Enbridge Gas's Indigenous consultation activities.
- d) Please obtain an update from the MOE on the status and anticipated timeline of receiving a Letter of Opinion for the Project.