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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 25, 2022

**EB-2022-0088 – Haldimand Shores Expansion Leave to Construct  
Pollution Probe Interrogatories to the Applicant**

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)  
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Zora Crnojacki, OEB Case Manager (via email)  
Richard Carlson, Pollution Probe (via: email)

**ONTARIO ENERGY BOARD**

**Enbridge Gas Inc.  
Haldimand Shores Expansion  
Leave to Construct**

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**POLLUTION PROBE INTERROGATORIES**

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**May 25, 2022**

**Submitted by: Michael Brophy  
Michael Brophy Consulting Inc.  
Michael.brophy@rogers.com  
Phone: 647-330-1217  
28 Macnaughton Road  
Toronto, Ontario M4G 3H4**

**Consultant for Pollution Probe**

1.1-PP-1

- a) Please provide a copy of the application project details submitted for funding assistance as part of Phase 2 of the Government of Ontario's Natural Gas Expansion Program ("NGEP"). If there are any differences between the project details (e.g. facilities, cost, customers, etc.) in the NGEP application and this Leave to Construct application, please reconcile the differences.
- b) Please provide a copy of the award/approval letter received from the NGEP for this project, including any conditions for funding.
- c) Is there a mandated timeframe under NGEP for completion of the proposed pipeline? If yes, please provide the relevant condition that dictates specific timing.

1-PP-2

Reference: "The Project is required to support the NGEP ..." [Exhibit B, Tab 1, Schedule 1, Page 6]

Please provide details on any obligations for Enbridge and the OEB to support NGEP and what those specific obligations are.

1-PP-3

- a) Please provide the scope of the project that falls under the Leave to Construct requirements and therefore requires OEB approval.
- b) Please describe what criteria in this project trigger any or all requirements for OEB Leave to Construct approval.

1-PP-4

- a) Please provide a copy of all communication material to potential customers and related contractors related to the proposed project to promote DSM or other energy efficiency opportunities when considering renovation of a primary (water/space) heating systems.
- b) Please provide a copy of all communication material to potential customers and related contractors related to the proposed project to educate them on the Greener Homes programs and rebates related to renovations and heating system changes.

3-PP-5

- a) What is the minimum number of customers that will need to attach to the proposed pipeline for it to remain feasible?
- b) Please explain what the financial implications are if less customers attach?
- c) Exhibit B, Tab 1, Schedule 1, Attachment 4 indicates that 25 (78% of 32) potential customers indicated that they are likely to convert to natural gas. How does this reconcile to the 112 customers included in the financial analysis for this project?

3-PP-6

- a) Please confirm that the amortization period for the proposed pipeline is 40 years. If that is incorrect, please provide the correct figure.
- b) Has Enbridge conducted a risk assessment on the probability that the proposed pipeline will become a stranded asset before being fully depreciated? If yes, please provide a copy of the assessment and all related materials. If no, what evidence exists to support that the pipeline will remain used and useful for the full amortization period.
- c) Please explain how any residual (unamortized) costs will be recovered from rate payers if the proposed pipeline becomes stranded before it is fully depreciated.

3-PP-7

- a) Please confirm that Enbridge will fund this project from its capital envelope for 2022 if approved by the OEB. If that is not correct, please clarify.
- b) If the project commissioning is delayed from December 2022 to early 2023, what impact will that have on the source for capital funding (e.g. will it change to the Enbridge 2023 capital envelope?).
- c) Please confirm what amount of project costs are being paid (directly or indirectly) from customers other than those proposed to attach to the pipeline.

3-PP-8

Please confirm that the project does not include or attract any indirect overhead costs. If that is incorrect, please indicate what those cost will be.

4-PP-9

[Exhibit F, Tab 1, Schedule 1]

- a) 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.
  
- b) Please provide an update on all required permits, including those related to wetlands and watercourse crossings.