

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities from the Township of Dawn-Euphemia to St. Clair Township;

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an Order or Orders approving the proposed forms of agreements for Pipeline Easement and Options for Temporary Land Use.

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

SEC-1

[A] Please provide a copy of all materials provided to Enbridge Inc. and EGI's Board of Directors related to the proposed project.

SEC-2

[A] Please provide a copy of any internal business case, or similar document, regarding the proposed project.

SEC-3

[B-1-1] Please provide the forecast remaining net book value of the assets that EGI proposed to retire as part of this project.

SEC-4

[B-1-1, p.11, para. 25] Please provide data or records showing continued and increasing compressor unit downtime, and long lead repair time related to the obsolescence and reliability issues of compressor units.

SEC-5

[B-1-1, p.14, para. 32] Please provide data or records showing the number of design days that actually occurred in the past 10 years. Please also provide forecast for the occurrence of design days for the next 10 years.

SEC-6

[B-1-1, p.14, para. 32] Please estimate the time that it will take for replacement to be procured to cover system shortfall.

SEC-7

[B-1-1, p.17, para. 36] Please provide supporting details for the estimated \$16 million savings in planned maintenance capital expenditures from 2023 – 2032, as result of the retirement of the compressor units.

SEC-8

[B-1-1, p.18, para. 40] Please provide justifications to the assumption of 2,000 run hours per year. Please also provide the actual run hours per year for each of the compressors for the past 5 years.

SEC-9

[B-1-1, p.22, para. 46] Please confirm if there were any other major repairs, comparable to the 2018 K705 crankshaft repair that occurred to any of the K701-K703 and K705-K708 compressors in the past 10 years. If yes, please provide cost details of the repairs.

SEC-10

[B-1-1, p.23, para. 47] Please provide all reports and materials consulted and produced for the QRA referenced therein.

SEC-11

[B-1-1, p.26, para. 52] Please explain whether there is an industry-wide trend of reducing the average number of compressors at compression centres in order to mitigate safety risks.

SEC-12

[B-1-1, Attachment 2, p.5, 7] SEC notes that K704 and K711 (HP) are responsible for 99.56% of the total gas injection shortfall and K710 and K709 (LP) are responsible for 86.77% of the total gas withdrawal shortfall. Has EGI considered the option of only replacing the K704 and K711 (HP), and the K710 and K709 (LP) compressors capacity with another method of compression? Alternatively, has EGI considered pre-emptively replacing high risk parts of these four compressor units?

SEC-13

[C-1-1] EGI assessed alternatives based on a scenario where it retires and abandons all 7 CCS compressor units, without the construction of a new NPS 36 pipeline and related work. Please explain why EGI did not model or consider any alternatives that would involve retirement of only some of the 7 compressor units.

SEC-14

[C-1-1, Attachment 1] Please provide a copy of the model used to calculate the NPV of the proposed project and the considered alternatives, with formulas intact. Please include details and all assumptions made.

SEC-15

[C-1-1, Attachment 2, p.61] Please confirm if ICF has consulted any other source of storage unit rates other than those provided on p.61. If yes, please provide them, if not, please explain why not.

SEC-16

[C-1-1, Attachment 2, p.8] If market-based storage capacity cannot be made available in a timely manner, please explain if market rate storage option could be adopted in long term if EGI phases out old compressor units at CCS gradually over years.

SEC-17

[D-1-1, p.1, Table 1] With respect to project costs:

- a. Please explain in detail what aspects are considered “pipeline costs” as opposed to “ancillary costs”.
- b. Please provide the date in which the cost estimate included in Table 1 was derived.
- c. Please explain what the expected impact the current inflationary environment will have on the proposed costs and how EGI plans to mitigate the impact.

SEC-18

[D-1-1] With respect to the allocation of costs:

- a. Please explain how EGI currently categorizes and allocates, for cost allocation purposes, the costs of the CCS compressor units that it plans to retire as part of this application, and how that may or may not be different than the proposed new pipeline.
- b. Please confirm that the CCS compressor units that EGI plans to retire currently serve both utility and non-utility storage operations.
- c. If part (b) is confirmed, please explain how those costs are currently allocated between EGI’s utility and non-utility operations.
- d. Please confirm that the new NPS 36 pipe will service both utility and non-utility storage operations.

If part (d) is confirmed, please explain how EGI plans to allocate costs between utility and non-utility operations

Respectfully, submitted on behalf of the School Energy Coalition this June 10, 2022.

Fred Zheng
Counsel for the School Energy Coalition