June 10, 2022

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

Dear Ms. Marconi,

RE: EB-2022-0086 Enbridge Gas Dawn to Corunna Leave to Construct
Energy Probe Interrogatories to Applicant

Attached are the interrogatories of Energy Probe Research Foundation (Energy Probe) to the applicant in the EB-2022-0086 proceeding, the application by Enbridge Gas Inc. to the Ontario Energy Board for Leave to Construct approval of its proposed Dawn to Corunna Pipeline.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
Digitally signed by Tom Ladanyi
Date: 2022.06.10 14:55:51 -04'00'

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe Research Foundation)
Michael Millar (OEB Staff)
Ritchie Murray (OEB Staff)
Adam Stiers (Enbridge Gas Inc.)

EB-2022-0086

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.

Enbridge Gas Inc. Dawn to Corunna LTC

Energy Probe Interrogatories

June 10, 2022

Enbridge Dawn to Corunna LTC

Energy Probe Interrogatories

1.EP.1
Reference: Exhibit A, Tab 2, Schedule 1, Page 1
Preamble: "Enbridge Gas Inc. ("Enbridge Gas," the "Company" or the "Applicant") has identified the need to abandon, remove and replace up to seven (7) reciprocating compressor units located at the Corunna Compressor Station ("CCS") due to identified reliability, obsolescence and safety concerns."

a) The quoted text indicates that "up to seven" units have been identified for abandonment, removal, or replacement. Does that mean that the number of units affected may be less than seven?

b) Does Enbridge need OEB approval to abandon, remove or replace compressors or for leave to construct the NPS 36 pipeline or both? Please explain your answer.

1.EP.2
Reference: Exhibit B, Tab 1, Schedule 1, page 3
Preamble: If the Project meets the criteria for rate recovery through the ICM mechanism then an ICM request for the costs of the same may form part of the Company's 2023 Rates (Phase 2) application.

a) Is the proposed NPS 36 pipeline a distribution line or does it serve another purpose?

b) Why does Enbridge believe that the cost of the proposed NPS 36 pipeline should be eligible for ICM funding from ratepayers?

1.EP.3
Reference: Exhibit B, Tab 1, Schedule 1, page 9, 21 and 27
Preamble: "On injection, units K704 and K711 will continue to be required after completion of the Project to compress gas arriving from Dawn to fill the top end of the pools to their Planned Maximum Operating Pressure ("PMOP"). On withdrawal, units K709 and K710 will be required to provide a low suction pressure from the CCS to allow the storage pools to reach cushion pressure or minimum operating pressure. These compressors (or equivalent horsepower) will always be required at CCS to achieve a full cycle of the 9 storage pools connected to the CCS, including after the completion of the Project."

a) Please confirm that units K704, K709, K710 and K711 will continue in service after the completion of the project.

b) Please confirm that unit K704 has second highest downtime and is one of the oldest CCS units.

c) Please confirm that K704 is in Building 1, K709 and K710 are in Building 2, and K711 is in Building 3. Please discuss why continued operation of these units is not a safety risk.

1.EP.4
Reference: Exhibit B, Tab 1, Schedule 1, page 10
Preamble: "This access has become increasingly important due to the increased frequency and severity of extreme weather events experienced across North America in recent years."

a) Please explain what Enbridge considers "extreme weather events"?

b) In which year did "extreme weather events" start?

c) Please file a table listing all "extreme weather events" in North America since the start of operation of CCS in 1964. For each "extreme weather event" please describe its impact on CCS operation.

1.EP.5
Reference: Exhibit B, Tab 1, Schedule 1, page 10
Preamble: "The Company recognizes its obligation to meet the firm demands of its customers and as a result, assets are continually evaluated to identify hazards and to assess risks in order to ensure that they remain reliable, suitable, and fit for continued service."

a) Please describe the firm demands that are mentioned in the quoted sentence.

b) Do CCS and the storage pools that were part of Tecumseh Gas Storage provide services for any firm demands from ex-franchise customers? If the answer is yes, please describe and quantify these firm demands.

c) Do CCS and the storage pools that were part of Tecumseh Gas Storage provide services for any non-firm demands from ex-franchise customers? If the answer is yes, please describe and quantify these non-firm demands.

d) What is the current Working Gas Capacity in PJ and Design Peak Withdrawal Capacity in PJ/day of CCS and the storage pools that were part of Tecumseh Gas Storage?

e) What Working Gas Capacity in PJ and Design Peak Withdrawal Capacity in PJ/day are required to meet the demands of in-franchise customers?

1.EP.6
Reference: Exhibit B, Tab 1, Schedule 1, page 11
Preamble: "As a result of these assessments the Company has identified serious and increasing obsolescence and reliability risks associated with certain CCS compressor units and is

experiencing a need for increased maintenance and repair work to keep the units operational going forward."

a) Is the need for the project increasing obsolescence and unreliability of certain compressor units and not any other reason such as increased frequency and severity of extreme weather events?

b) Please file a table showing maintenance hours per operating hour for each compressor unit since 1964 or as far back as there are records.

c) Is the purpose of the project the maintenance of gas storage capability after these compressor units are removed from service?

1.EP.7
Reference: Exhibit B, Tab 1, Schedule 1, page 13
Preamble: "For casted components, such as crankshafts, spares are not stocked in inventory by the Original Equipment."

a) Are these crankshafts castings or are they forgings as they are in most reciprocating engines?

b) How many crankshafts have failed since the units were placed in service? Please provide the year of each crankshaft failure.

1.EP.8
Reference: Exhibit B, Tab 1, Schedule 1, pages 13 to 17

Please file a table that lists all 11 compressors, name of original manufacturer, manufacturer's model number, and year placed in service.

1.EP.9
References: Exhibit B, Tab 1, Schedule 1, Page 21, and Table 4
Preamble: "In total, the combined compressor downtime during Injection Mode across the 5-year period is 606 days. This means that at least one compressor is down for maintenance or repair 77% of the time during the injection season. Units K704 and K701 show the highest down times, forecasted to be down for a total of 118 and 101 days during the injection season, respectively."

a) Please expand Table 4 to show the separate maintenance column and repair column.

b) Please file a schedule that shows the regular maintenance schedule fore each unit.

c) Has the regular maintenance schedule changed since the units were first placed in service? If the answer is yes, when did the schedule change and why? If the answer is no, please explain why not.

2.EP.10
Reference: Exhibit C, Tab 1, Schedule 1, Page 1

Did Enbridge consider an alternative that would only consider the needs of in-franchise customers? Please explain your answer.

2.EP.11
Reference: Exhibit C, Tab 1, Schedule 1, page 3, Table 1

a) What discount rate was used in the NPV analysis?

b) What discount rate would be required for Alternative 1, Natural Gas Fired Compression, to have a better NPV than the Project?

3.EP.12
Reference: Exhibit C, Tab 1, Schedule 1

Table 2 shows the O&M of Electric Motor Drive Compression as $6.84 million per year and Natural Gas Fired Compression as $3.88 million per year. Please provide assumptions and calculations that support these estimates.

3.EP.13
Reference: Exhibit D, Tab 1, Schedule 1, Page 1, Table 1, Note
Preamble: "The total costs set out in Table 1 include abandonment of the existing seven CCS compressor units K701-K703 and K705-K708 amounting to $14.5 million."

a) Is the abandonment cost of $14.5 million included in Item 2.0 Construction & Labour in the Ancillary Costs column?

b) What is the estimated salvage value of the scrap steel from the abandoned units and piping?

c) What is the net salvage value of the abandonment (salvage value minus cost of removal)?

d) Will net salvage be charged to accumulated depreciation of the remaining four compressor units? Please explain your answer.

3.EP.14
Reference: Exhibit D, Tab 1, Schedule 1, Page 1, Table 1

a) Please confirm that Leave to Construct approval is only required for the NPS 36 pipeline and not for Ancillary work.

b) What is the exact length of the pipeline?

c) Please confirm that the pipeline will be built on agricultural land with no major water crossings.

d) What is the cost per km or per metre of the pipeline and how does it compare to the cost of similar diameter pipelines on agricultural land?

e) Please list the facilities that are included in the Ancillary Costs column.

f) Why are there no costs for Direct Overheads and IDC for Ancillary work?

g) Will Pipeline and Ancillary construction work and work be contracted out?

h) How many Enbridge employees are or will be charging time to the project? Please provide your answer in headcount and full-time equivalents (FTEs).

i) What costs are included in Direct Overheads and what costs are included in Indirect Overheads & Loadings?

j) How were the amounts for indirect overheads and loadings estimated? Please provide a schedule showing the calculations that support the numbers in the table.

k) Please provide a breakdown of the costs in External Permitting & Lands. Specifically, how much of the money will be paid to landowners and municipalities?