

VIA RESS

August 15, 2022

Ontario Energy Board
Attn: Ms. Nancy Marconi, OEB Registrar
P.O. Box 2319
27th Floor, 2300 Yonge Street
Toronto ON M4P 1E4

**RE: EB-2022-0086 EGI Dawn to Corunna Replacement Project
FRPO Request for Technical Report**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) as a follow-up to our interrogatory and undertaking request for EGI to file the Technical Report that provided an assessment of the alternatives to recommend the proposed solution that was approved by EGI senior management.

FRPO has strived to assist the Board with discovery and its opinion on the technical merits of the proposed NPS 36 pipe linking Dawn and Corunna. In our interrogatories¹, we had asked:

“Please file the study(ies), technical reports and summary model outputs that assessed the alternatives described in this schedule (Ex. C, Tab 1, Sch. 1)”

While the interrogatory response provided some summary results from the model results, we did not receive any study or technical report that assessed the alternatives. We pursued this information through clarification of our request to EGI witnesses in the technical conference². The exchange concluded with:

MR. QUINN: So Ms. Thompson, did you approve the alternative selection from the engineering group or the facilities design group before it went to the board of directors?

MS. THOMPSON: The project as proposed went through a number of approval steps, which ultimately led to the board of directors.

MR. QUINN: Were you one of the people who approved it?

MS. THOMPSON: Yes.

MR. QUINN: Okay. Can you file the report that you received from your engineering group? That is what we were asking for from studies and technical reports. So I would like that filed on the record, please.

MS. THOMPSON: Yes. We can do that.

MR. QUINN: Thank you.

¹ Exhibit I.FRPO.24

² Transcripts_Enbridge Technical Conference_day 1_20220727 page 97, line 5 to page 98, line 15

The assigned undertaking, JT1.5, provided some process descriptions and referenced the **presentation** provided in undertaking JT2.6. However, the engineering **report** that provided an assessment of alternatives that was approved by Ms. Thompson was not provided. Consistent with our requests throughout this proceeding, we are asking EGI to file a copy of the **report** providing the assessment of alternatives, approved by Ms. Thompson.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. A. Stiers, EGIRegulatoryProceedings – EGI
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Interested Parties – EB-2022-0086