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August 17, 2022

VIA EMAIL and RESS

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

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (“Enbridge Gas”)
Ontario Energy Board (“OEB”) File: EB-2022-0086
Dawn to Corunna Replacement Project
Response to Federation of Rental-housing Providers of Ontario (“FRPO”)**

Further to the letter filed by FRPO on August 15, 2022 in the above noted proceeding, whereby FRPO claims that “the engineering **report** that provided an assessment of alternatives that was approved by Ms. Thompson was not provided.” and reiterates its request that Enbridge Gas file “a copy of the **report** providing the assessment of alternatives, approved by Ms. Thompson.” Enbridge Gas has already been fully responsive to FRPOs requests.

During Day 1 of the Technical Conference Mr. Quinn asked for clarification from Enbridge Gas witnesses with regard to the process to attain senior management approval of the Project, including assessment of alternatives:¹

MR. QUINN: No, no, actually, Mr. Cadotte, I need to move on, and I don't want to rag the puck here. Frankly, I have got enough, and I'm just going to move on. Thank you.

So moving forward into FRPO 24. We had asked about the assessment, the study and assumptions made and the alternatives that were considered in this analysis to come up with your proposed application, and I said: "Please file studies, technical reports, and summary output models that were assessed."

Now, we did get some outputs and, yes, the numbers are there, and that is why I asked you to summarize them, so that was helpful, thank you.

But where are the reports? Like, somebody had to approve this project from senior management that looked at how you assess the alternatives.

Who would that have been? Would that be you, Ms. Thompson?

¹ Technical Conference Day 1 TR, pp. 95-97.

MS. THOMPSON: The project was ultimately approved by the board of directors, and we did file a presentation at SEC 1.

MR. QUINN: And in that presentation, does it have the assessment of alternatives, including the use of compressors versus pipeline? Okay. What I am going to do for the purposes of moving on, SEC has some questions later on. I have some follow-up questions which I cut out, and maybe we will get clarity at that point. I need to be able to move on.

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.

Enbridge Gas subsequently filed Exhibit JT1.5, which explained that the engineering studies and technical reports that informed decision making with regard to alternatives assessment and the appropriate scope of replacement facilities were the QRA and RAM Study documents which form part of pre-filed evidence and responses to interrogatories. Enbridge Gas went on to explain that the presentation made to the Enbridge Gas Utility Leadership Team (see Exhibit JT2.6) was the "Report" ultimately approved by Ms. Thompson as it:

- (i) Relied upon the conclusions of the engineering studies and technical reports noted above to define the underlying risk to ratepayers;
- (ii) Included assessments of facility and non-facility alternatives to address the risk identified; and
- (iii) described the scope of the proposed Project.

Notwithstanding the Company's response at Exhibit JT1.5, throughout the course of this proceeding Enbridge Gas has produced the various technical/engineering reports and studies that contributed to and/or affirmed its decision to proceed with the proposed Project. The Company has also provided further evidence to supplement and clarify these documents in its responses to interrogatories, undertakings and questions posed by FRPO and other intervenors during the Technical Conference. Table 1 below summarizes these documents.

Table 1

Document	Reference	Description
Asset Health Review (AHR)	Exhibit I.ED.1, part c.), Attachment 1	2018 study that informed the declining reliability of compressor assets at Corunna Compressor Station. The AHR was updated in 2021 and failure data was used as the inputs for the RAM model.
Enbridge Gas Corunna Compressor Station – Site Wide Quantitative Risk Assessment	Exhibit I.CME.1, Attachment 1	This QRA evaluates the potential risk level for workers due to accidental releases of hazardous materials, mainly natural gas, from loss of containment scenarios from the CCS facility. The results of the QRA conclude that the site exceeds the upper risk threshold for several worker groups at the CCS.
DNV GL Review of the Quantitative Risk Assessment (QRA) of Enbridge Corunna Compressor Station	Exhibit I.CME.1, Attachment 2	Independent reviewer (DNV GL) was hired to evaluate the QRA (Exhibit I.CME.1 Attachment 1).
Enbridge Presentation and Undertaking response to FRPO	Exhibit KT1.1, slides 7 & 8 Exhibit JT2.8, Figure 2	System Schematic W23/24 Design Day Base Case and with TR7. Demonstrates the input from Corunna to Dawn at 4,826 kPag is 2.7 PJ for both the base case and the Project and the output pressure to the Dawn-Parkway System remain the same.
Net Present Value Assessment of Alternatives	Exhibit C, Tab 1, Schedule 1, p. 23, Table 2 Exhibit C, Tab 1, Schedule 1, Attachment 1	Compares NPV of facility alternatives (Pipeline, Natural Gas Fired Compression, Electric Motor Drive Compression).
Dawn to Corunna Project – Utility Leadership Team Meeting (Presentation)	Exhibit JT2.6, Attachment 1, p. 4	Project Alternatives – Stage 1 Economic Evaluation.
Dawn to Corunna Project – Board of Directors (Presentation)	Exhibit I.SEC.1, Attachment 1	As per Exhibit JT1.19, the presentation that informed the project approval from the

		Enbridge Inc. Board of Directors.
RAM Study Report	Exhibit B, Tab 1, Schedule 1, Attachment 2	Reliability, Availability and Maintainability study for the Corunna Compressor Station.
Enbridge Gas TR7 Pipeline Corridor Risk Assessment Report	Exhibit I.CME.1, Attachment 3	This QRA was performed to evaluate risk from the new TR7 pipeline as a replacement of the compressors which will be abandoned (CCS units K701 to K703 and K705 to K708).
DNV Dawn-Corunna Modifications Project QRA Report	Exhibit I.CME.1, Attachment 4	This QRA was performed to evaluate risk after the abandonment of CCS units K701 to K703 and K705 to K708 at the CCS as part of the Project.

Table 1 reflects the entirety of the documentation that informed Enbridge Gas decision makers with regard to the proposed Project. FRPO’s refusal to accept the evidence and/or testimony of Enbridge Gas witnesses is without basis. The OEB should reject FRPO’s suggestion that Enbridge Gas is refusing to produce evidence that would assist the Board.

Please contact the undersigned if you have any questions.

Yours truly,

Adam Stiers

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Adam Stiers
Manager, Regulatory Applications – Leave to Construct

c.c. Charles Keizer (Torys)
Ritchie Murray (OEB Staff)
Intervenors (EB-2022-0086)