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September 1, 2022

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

Dear Ms. Marconi,

**RE: EB-2022-0157 Enbridge Gas Inc. Panhandle Regional Expansion Project
Energy Probe Interrogatories to the Applicant**

Attached are the interrogatories of Energy Probe Research Foundation (Energy Probe) to the Applicant in the EB-2022-0157 proceeding, the application by Enbridge Gas Inc. to the Ontario Energy Board for Leave to Construct approval of its proposed Panhandle Regional Expansion Project.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe Research Foundation)
Zora Crnojacki (OEB Staff)
Dave Janisse (Enbridge Gas Inc.)
Michael Millar (OEB Staff)

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ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B; and in particular section 90(1) and section 97 thereof;
AND IN THE MATTER OF an application by Enbridge Gas Inc. for an order granting leave to construct natural gas pipelines in the Municipality of Chatham Kent and Essex County.

Enbridge Gas Inc. Panhandle Regional Expansion Project

Energy Probe Interrogatories

September 1, 2022

Enbridge Gas Inc. Panhandle Regional Expansion Project

Energy Probe Interrogatories

EP.1

Reference: Exhibit A, Tab 3, Schedule 1, Page 5, paragraph 13

Preamble: “If the Project meets the criteria for rate recovery through the ICM mechanism, then an ICM request for the costs of the Project may form part of the Company’s 2023 Rates (Phase 2) application.”

Please confirm that Enbridge will not be requesting rate recovery through the ICM mechanism for this project.

EP.2

Reference: Exhibit B, Tab 1, Schedule 1, page 10, paragraph 29

Preamble: “Enbridge Gas is aware of, has reviewed, and is working in conjunction with the municipalities within the Panhandle Market to determine whether the expansion of the Panhandle System impacts their ability to achieve the greenhouse gas emissions (GHG) reduction goals outlined within their respective Community Energy Plans (“CEPs”).”

Please file copies of CEPs of the municipalities within the Panhandle market.

EP.3

Reference: Exhibit B, Tab 1, page 11, paragraph 31, Table 1

What percentage of the increase in the demand day forecast is due to contract firm customers?

EP.4

Reference: Exhibit B, Tab 1, page 11, paragraph 39

Preamble: “As indicated by the letters of support received by Enbridge Gas (see Attachment 3 to this Exhibit), the Project has broad support from various parties, including regional municipalities and chambers of commerce”

Please confirm that Enbridge asked various parties for letters of support.

EP.5

Reference: Exhibit B, Tab 2, Schedule 1, page 4

Preamble: “Ex-franchise easterly C1 Rate transportation and Interruptible in-franchise contract rate demands are not included in the Design Day demand as they are not controlled by Enbridge Gas and are not guaranteed to arrive on Design Day.”

- a) Please explain what is ex-franchise easterly C1 Rate transportation contract rate demand?
- b) Is there in-franchise easterly C1 Rate transportation contract rate demand? If the answer is yes, what is the amount, and has it been included in the Design Day demand?
- c) Who controls easterly C1 Rate transportation contract demand?

EP.6

Reference: Exhibit B, Tab 2, Schedule 1, page 6, paragraph 12

Preamble: “The BBGS is located at the extreme western end of the Panhandle System just east of Ojibway. The pressure constraint for the entire Panhandle System is located at the outlet of the BBGS customer station, where the contracted minimum delivery pressure must be maintained at or above 1,724 kPag;”

- a) Please confirm that BBGS can be supplied by easterly flow from Ojibway.
- b) Please file a copy of the contract between Enbridge and BBGS which specifies the minimum delivery pressure.
- c) What is the term of the contract between Enbridge and BBGS and when does it expire?
- d) Has Enbridge discussed with BBGS a revised contract for a lower minimum delivery pressure?

EP.7

Reference: Exhibit C, Tab 1, Schedule 1, page 5, paragraph 12

- a) Did Enbridge consider an alternative that would use a compressor close to BBGS to maintain the delivery pressure to BBGS? Please discuss.
- b) Did Enbridge consider an alternative of having BBGS replace its fuel gas compressor with a compressor that would accept a lower delivery pressure? Please discuss.

EP.8

Reference: Exhibit C, Tab 1, Schedule 1, page 11, Table 3, Pipeline Loop, and Lateral Interconnect Economic Assessment

- a) Please confirm that the alternative with the least negative NPV would require the least subsidy from ratepayers over its life.
- b) Please confirm that the NPS 30 line with the NPS 16 lateral has the least negative NPV and would require a lower subsidy than the preferred alternative.

EP.9

Reference: Exhibit E, Tab 1, Schedule 1. Page 6, paragraph 9

Preamble: This schedule indicates that the Project has a NPV of negative \$95 million and a PI of 0.63.

Considering the large negative NPV and a low PI of the proposed project did Enbridge consider asking contract customers with increased demand to pay a contribution or a surcharge? Please discuss.