

September 22, 2022

**VIA RESS**

Ms. Nancy Marconi  
Registrar  
**ONTARIO ENERGY BOARD**  
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Dear Ms. Marconi:

**Re: EB-2022-0086 – Enbridge Gas Inc. (EGI) Application for Leave to Construct Natural Gas Pipeline and Ancillary Facilities in the Township of Dawn-Euphemia and St. Clair Township (Dawn to Corunna Replacement Project).**

**Industrial Gas Users Association (IGUA) Submission.**

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We write as counsel to IGUA with brief submission on EGI's request for approval of its proposed Dawn to Corunna Replacement Project.

IGUA's overall interest in the project is the maintenance of reliable storage related (injection and withdrawal) seasonal system load balancing operability. We will defer to other parties who have more extensively reviewed the operational details of the compressor facilities proposed for retirement and the pipeline (and related compression operations) proposed to replace them. We expect a number of parties to discuss alternatives to the proposed project in their final submissions, and express no opinion on the veracity (operational or economic) of any particular alternatives.

IGUA does wish to express its view that consideration of the need for this proposed project, and the sufficiency of any alternatives thereto that parties may advance, must all be taken in the context of the functionality of the assets proposed for retirement and those proposed in replacement. For example, a community expansion project at the periphery of EGI's existing system, and alternatives thereto, presents a very different contextual consideration than the instant project which is advanced by EGI as required in order to maintain EGI's ability to reliably and cost effectively meet peak day demand through continued reliable operation of Ontario gas storage annual injection and withdrawal cycles and exigencies.

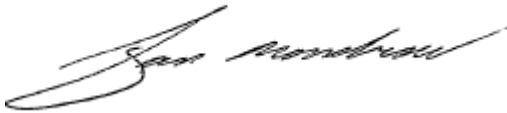
Ontario's gas storage resources are singularly valuable in the provision of consistent and reliable gas delivery service to Ontario customers. They are, in many respects, at the core of our provincial gas delivery system. While legitimate questions and concerns can be, and have been increasingly, raised regarding the likely longevity of that gas delivery system and the wisdom (i.e. "prudence") of

significant new and long lived investments therein, to the extent that those concerns come to fruition in an energy transition future, EGI's storage assets would most likely be "the last to go" in terms of value to Ontario energy consumers.

Considering this context, IGUA believes this is an important project and that it, and alternatives to it, should be considered in reference to the core function for reliable and affordable year round gas supply that Ontario's gas storage assets have provided, continue to provide, and are likely to continue to provide for some time to come, to Ontario energy consumers.

We also wish to note that the foregoing position is without prejudice to positions that IGUA may put forward in the future, based on a fully developed related record, regarding the appropriate allocation of storage related costs as among EGI's delivery customers and as between utility and non-utility storage services. We understand such storage cost allocation questions to be a topic for EGI's pending rebasing proceeding.

Yours truly,



Ian A. Mondrow

c: S. Rahbar (IGUA)  
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