

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

November 16, 2022

**EB-2022-0203 – Ridge Landfill RNG Leave to Construct
Pollution Probe Interrogatories to the Applicant**

Dear Ms. Marconi:

In accordance with Procedural Order No. 1 for the above noted proceeding, please find attached Pollution Probe's Interrogatories to the Applicant.

Please reach out should you have any questions.

Respectfully submitted on behalf of Pollution Probe.



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Cc: Adam Stiers, Enbridge (via email)
Tania Persad, Enbridge Legal (via email)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

**Enbridge Gas Inc.
Ridge Landfill RNG Project
Leave to Construct**

POLLUTION PROBE INTERROGATORIES

November 16, 2022

**Submitted by: Michael Brophy
Michael Brophy Consulting Inc.
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Phone: 647-330-1217
28 Macnaughton Road
Toronto, Ontario M4G 3H4**

Consultant for Pollution Probe

1-PP-1

- a) Please confirm that the proposed 6 km of Nominal Pipe Size (“NPS”) 4 inch extra-high pressure (“XHP”) steel (“ST”) natural gas main will be solely used by a single renewable natural gas (“RNG”) producer, RIDGE (CHATHAM) HOLDINGS, L.P (aka Waste Connections). If that is not correct, please explain what other customers or suppliers will use that pipeline.
- b) The proposed project is defined as a gas distribution main rather than a service connection to the customer. Is the main a dedicated direct feed from the customer or is there also a service required? If an additional service is required, please provide the specifications and estimated cost.
- c) Will the customer (RIDGE (CHATHAM) HOLDINGS, L.P. aka Waste Connections) be consuming natural gas from the Enbridge system or only providing landfill methane into the system?

1-PP-2

- a) Please explain how the M13 contract Firm Daily Variability Demand of 1,050 GJ correlates to maximum daily quantity of 184,104 m³/day.
- b) Please provide Enbridge’s calculations to determine how peak supply from the supplier [RIDGE (CHATHAM) HOLDINGS, L.P aka Waste Connections] per its M13 contract (i.e. maximum daily quantity of 184,104 m³/day) translates to the proposed minimum Nominal Pipe Size of steel pipeline operating at extra-high pressure.
- c) If the nominal pipe size required to serve the parameters in the RIDGE (CHATHAM) HOLDINGS, L.P (aka Waste Connections) M13 contract is less than NPS 4 inch, please explain how NPS 4 was determined for purposes of this application and what excess peak capacity it enables.

1-PP-3

Reference: The Project was identified in Enbridge Gas’s Asset Management Plan as part of the Company’s 2021 Rates proceeding. [A/2/1 para. 3].

- a) Enbridge filed an updated Asset Management Plan in EB-2022-0200. Please provide the references from the current AMP relevant to the proposed project and explain if they have changed from the information in the 2021 AMP.
- b) Does the Asset Management Plan filed in EB-2022-0200 replace the 2021 Asset Management Plan?

1-PP-4

- a) Please provide a copy of the original request (letter or email) from the supplier [RIDGE (CHATHAM) HOLDINGS, L.P. aka Waste Connections] requesting RNG transportation services from Enbridge.
- b) If the maximum daily quantity of 184,104 m³/day of gas was not included in the original supplier request letter, please provide the supplier correspondence that enabled Enbridge to determine 184,104 m³/day of gas as the appropriate maximum daily quantity.

1-PP-5

Reference: "To reduce and manage greenhouse gas emissions, consistent with the Government of Ontario's Climate Change goals, Waste Connections of Canada Inc. ("Waste Connections") plans to construct and operate new renewable natural gas ("RNG") gathering, upgrading and compression facilities ..." [B/1/1 paragraph 1]

- a) Please provide all Government of Ontario policy references currently in place that support reduction of emissions through support of RNG.

1-PP-6

Reference: "The Project is expected to reduce greenhouse gas emissions by 110,000 tonnes per year" [F/1/1 Attachment 1 page viii]

- a) Please provide the calculations that result in an estimated reduction from the project of greenhouse gas emissions by 110,000 tonnes per year. If the volume of RNG in the calculation differ from the RNG volumes outlined in the M13 contract, please explain.
- b) Will the emission credits related the RNG from this facility accrue to Ontario natural gas ratepayers? If not, who will own the emission credits?
- c) Does Enbridge intend to purchase RNG from this project to meet its Voluntary RNG program supply? If yes, what portion of the program supply is expected to come from this project?

1-PP-7

Reference: “Enbridge Gas, in partnership with Waste Connections of Canada, are proposing to create a brand new RNG facility at the Ridge Landfill” [F/1/1 Attachment 1 page viii]

- a) Please explain what the partnership is with Enbridge for the RNG project and please provide a copy of any partnership documents.
- b) Other than the proposed pipeline and RNG injection station is Enbridge involved in any other element of the RNG projects (including production, transportation, sales, emission credits, etc.)

3-PP-8

Enbridge is currently coordinating its rebasing application for 2024 (EB-2022-0200). Please explain how this project relates (if at all) with the rebasing application.

3-PP-9

Table 1 in E/1/1 Page 1 indicates that CIAC is \$11,480,872.

E/1/1 Attachment 1, Page 8 indicates the CIAC equals two payments of \$6,125,235.72 or \$12,250,471.44 in total.

- a) Please explain the difference and confirm which one is correct.
- b) Please explain what happens to the CIAC contribution if the project costs vary from the estimate (i.e. higher or lower).

3-PP-10

- a) Will the new pipeline result in any annual O&M costs related to operation, maintenance or integrity? If yes, what is Enbridge’s best estimate of those annual costs.
- b) In EB-2022-0086 Enbridge indicated that it has an internal policy requirement to purchase offsets to ensure that any new pipeline project align with Enbridge’s Net Zero policy. Will Enbridge need to purchase carbon offsets for this project? If yes, what is the estimated amount and cost of those offsets? If not, why not?

3-PP-11

Reference: Exhibit E, Tab 1, Schedule 1, Attachment 1, Page 7 of 12

Fuel Requirements

Please check one: Shipper provides fuel OR Enbridge provides fuel

- a) Please explain what fuel is referred to in the M13 contract reference above.
- b) Please explain why Enbridge needs to provide fuel when the project and related M13 contract are intended to enable the supplier to export fuel (i.e. methane).

4-PP-12

Has Enbridge received the final review and approval letter from TSSA? If not, please indicate when it is expected.

4-PP-13

Please provide an updated project schedule including major milestones including permits and approvals.