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Enbridge Gas Inc.
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January 16, 2023

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” or the “Company”)
Ontario Energy Board (“OEB”) File: EB-2022-0203
Ridge Landfill RNG Project
Response to January 11, 2023 FRPO Correspondence**

This correspondence is in response to the Federation of Rental Housing-providers of Ontario (“FRPO”) letter dated January 11, 2023 (the “Letter”), wherein FRPO states that,

While we firmly believe that our submissions will assist the Board, in retrospect, we do respect that we should have appealed to the OEB for more fulsome interrogatory responses and/or a technical conference to follow a more traditional approach.¹

FRPO is not an inexperienced intervenor in leave to construct proceedings before the OEB, and it ought to know that if an interrogatory response does not provide the information sought it could have requested further information during the discovery process either by IRs and/or a technical conference. Furthermore, contrary to FRPO’s statements that Enbridge Gas did not provide the requested information at Exhibit I.FRPO.1 and that the evidentiary record is not complete regarding the analysis of alternatives, Enbridge Gas considers the response to Exhibit I.FRPO.1 fully responsive.² The evidentiary record with regard to this matter is straight forward because, as repeatedly stated by Enbridge Gas throughout the course of the proceeding,³ the injection volumes of renewable natural gas that are projected to be delivered by Waste Connections Inc. (“Waste Connections”) limits the possible connection locations to Enbridge Gas’s existing natural gas system as the demand on the associated network must be equal to or greater than the proposed injection volume of RNG. For this reason, there is only one existing system in the area that the Project can connect to. No other feasible facility alternatives (aside from the proposed Project) exist to meet the Customer’s need in the vicinity.

¹ FRPO Correspondence, January 11, 2023, p. 2

² FRPO Correspondence, January 11, 2023, p. 1

³ Exhibit B, Tab 1, Schedule 1, p. 1, Exhibit C, Tab 1, Schedule 1, pp. 1-2, Exhibit I.FRPO.1, Exhibit I.FRPO.2, Enbridge Gas Reply Submission, January 9, 2023, pp. 9-11.

Although Enbridge Gas does not believe any weight should be given to FRPO's additional submissions as they are improper, Enbridge Gas will address the factual errors in FRPO's letter. FRPO's Letter incorrectly asserts that the Ridgetown Line constitutes a feasible alternative to the Project. To support its assertion FRPO states that,

...in accordance with the pipeline code CSA Z662, pipe segments of different Maximum Operating Pressure must be separated by an above ground valve in a station.⁴

However, because there is no separation between the 1,900 kPa MOP section and the 3,450 kPa MOP section of the Ridgetown Line, the entirety of the line must be operated at 1,900 kPa.

FRPO also incorrectly asserts that Station (06J-202) "near the junction of the Ridgetown Line and the Shrewsbury connection" can eliminate the constraint identified by Enbridge Gas. In fact, the station referenced (06J-202) is located at Communication Road and Talbot Trail and is not hydraulically linked to the 1,900 kPa section of the Ridgetown Line located on Erieau Road (approximately 4.6 km away). As a result, this station has no effect on the ability to operate the Ridgetown Line at a higher operating pressure.

Nevertheless, even if the system and station modifications proposed by FRPO were completed to allow the Ridgetown Line to run at 3,450 kPa and connect with the Windsor and Wheatley Lines, the available market is still substantially less than the customer's requested volume. As stated throughout Enbridge Gas's evidence, interrogatory responses and reply submission, lack of sufficient downstream market makes such an alternative infeasible. It is Enbridge Gas's view that the OEB should give no weight to FRPO's latest submissions as FRPO has acknowledged it did not follow the OEB procedure and the additional detail provided is factually incorrect.

Please contact the undersigned if you have any questions.

Yours truly,

Brittany Zimmer
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c.c. Guri Pannu (EGI Legal Counsel)
Catherine Nguyen (OEB Staff)
Intervenors (EB-2022-0203)

⁴ FRPO Correspondence, January 11, 2023, p. 1