

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

February 24, 2023

**EB-2022-0247 – Kennedy Station Relocation Leave to Construct  
Pollution Probe Interrogatories to Applicant**

Dear Ms. Marconi:

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

Respectfully submitted on behalf of Pollution Probe.



Michael Brophy, P.Eng., M.Eng., MBA  
Michael Brophy Consulting Inc.  
Consultant to Pollution Probe  
Phone: 647-330-1217  
Email: [Michael.brophy@rogers.com](mailto:Michael.brophy@rogers.com)

Cc: Eric VanRuymbeke, Enbridge Regulatory (via email)  
Guri Pannu, Enbridge Legal (via email)  
All Parties (via email)  
Richard Carlson, Pollution Probe (via email)

**ONTARIO ENERGY BOARD**

**Enbridge Gas Inc.  
Kennedy Station Relocation  
Leave to Construct**

---

**POLLUTION PROBE INTERROGATORIES**

---

**February 24, 2023**

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

**Consultant for Pollution Probe**

1-PP-1

Please explain why OEB Leave to Construct approval is required for this project (i.e. why can't Enbridge proceed without Leave to Construct approval).

1-PP-2

Enbridge indicates the following elements to the proposed project.

Phase 1:

- 310 m of Nominal Pipe Size ("NPS") 4 Polyethylene ("PE") Intermediate Pressure ("IP") gas main relocation and
- 120 m of NPS 2 PE IP service relocation

Phase 2:

- 30 m of NPS 8 Steel Coated ("SC") High Pressure ("HP") gas main relocation.
- 330 m of NPS 8 PE IP gas main relocation.
- 16 m of NPS 6 PE IP gas main relocation
- 25 m of NPS 4 PE IP gas main relocation

For each of the six pipeline sections proposed, please provide the following information.

- How many customers are served by the proposed pipe section
- How many customers would not have natural gas available if the section was not built.
- How many new customers will be served due to the new section of pipe (directly or fed via the section)

1-PP-3

Phase 2 serves a parcel of land owned by Metrolinx.

- a) Will Phase 2 only serve the subway station or other customers.
- b) Please explain if Enbridge has assessed condominium or additional development on the Metrolinx lands proposed to be served. If yes, please provide details on how this was included in project planning and pipeline sizing.

1-PP-4

Enbridge indicates that it “will also relocate a district station and bollard protection system onto a permanent easement at 2500 Eglinton Avenue East”. [Exhibit A, Tab 2, Schedule 1, Page 2]

- a) Are the station facilities referenced above included in the facilities also requiring Leave to Construct approval?
- b) Please confirm how many customers are served from the existing station and how many customers are proposed to be served from the new station.

1-PP-5

Reference: The proposed pipelines and facilities are expected to be placed into service in December 2023 and July 2025, respectively”. [Exhibit A, Tab 2, Schedule 1]

- a) When did Enbridge become aware of the Scarborough Subway Extension and the need to potentially relocate pipelines and/or stations
- b) Please confirm if Enbridge is aware of any delays in the Scarborough Subway Extension project.
- c) Please indicate what the proposed completion date is of the Scarborough Subway Extension project and the whether routing alignment changes could occur prior to completion.
- d) What other facilities will need to be replaced or relocated due to the Scarborough Subway Extension. Why were all of the impacted facilities not included in one application to the OEB?

2-PP-6

Please confirm that the Environmental Report only assessed the proposed pipeline option selected by Enbridge and did not compare alternatives to a pipeline solution.

## 2-PP-7

Reference: Enbridge map of Impacted customers [Exhibit B, Tab 1, Schedule 1, Figure 2].



- a) Strip malls and businesses along the construction corridor for the Metrolinx subway project have closed or not had their leases renewed due to construction impacts and/or redevelopment plans. Please provide a copy of all analysis and communications that have been undertaken by Enbridge to confirm these business will remain and require natural gas.
- b) Strip malls along the Metrolinx subway expansion are being be redeveloped into high density condominiums. Has this been considered in Enbridge's project analysis and please explain what level (e.g. how many buildings/units) of high-rise development the proposed pipeline would support.
- c) How many of the 22 customers identified as impacted are part of the Midland and Eglinton Plaza strip mall (2480 Eglinton Avenue East)?
- d) Please provide any communication with the owner (or related developer) of Midland and Eglinton Plaza strip mall regarding future development plans.
- e) If the proposed pipeline needs to be replaced by a larger pipeline to serve condominium development, how would that impact the pipeline and related facilities proposed in the application.

## 3-PP-8

Are all components of the proposed pipeline and related proposed station designed to distribute hydrogen or just natural gas? If designed to distribute hydrogen in the future, please indicate what modifications were required to enable the infrastructure to be compatible with hydrogen.

3-PP-9

- a) Enbridge estimates a total project cost of \$5.4 million in order to provide natural gas to 22 customers, or \$245k per customer. Please confirm this calculation or provide a corrected calculation if any elements is not correct.
- b) Please provide a copy of the agreement with Metrolinx that binds it to pay Enbridge for costs related to the proposed pipeline project.
- c) Subway extension plans have been cancelled or modified previously. Please provide the contract terms that ensure rate payers will not have to pay the project costs if the Scarborough Subway Extension project is cancelled.

3-PP-10

Enbridge indicates that the project capital costs would be reimbursed by Metrolinx. Please explain if this means that the project will not go into capitalized rate base or if it still would be added to capitalized rate base recovered from rate payers, how the proposed Metrolinx reimbursement would be applied. Please also confirm the amortization period for any project amount that would be proposed for inclusion in capitalized rate base.

3-PP-11

In EB-2022-0086 and other Leave to Construct proceedings 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.

- a) Does Enbridge Net Zero GHG policy apply to this proposed project? If not, please explain why not.
- b) What is the estimated cost for this project to be Net Zero (e.g. estimate offset credits)?
- c) Please confirm where Enbridge proposes to recover costs related to this project to comply with Enbridge's Net Zero policy.
- d) Are there any other costs related to the proposed project not included in the Leave to Construct application. If yes, please summarize.

4-PP-12

- a) Please provide a copy of the application made to the TSSA for this project.
- b) Enbridge indicated that it has not received project approval from TSSA [Exhibit D, Tab 1, Schedule 1, Page 9]. Please provide a copy of TSSA correspondence or approval if this has been received.

4-PP-13

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

4-PP-14

The evidence indicates that out of 13 Ontario Pipeline Coordinating Committee (OPCC) request for comment and approval, only 1 response has been received [Exhibit F, Tab 1, Schedule 1, Attachment 2].

- a) Please confirm or provide any additional responses received.
- b) Please indicate what process Enbridge used to confirm that the representatives emailed are the correct representatives for the OPCC organizations.