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Enbridge Gas Inc.
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VIA EMAIL and RESS

May 18, 2023

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (“Enbridge Gas” or the “Company”)
Ontario Energy Board (“OEB”) File Nos.
EB-2022-0156 – Selwyn Pipeline Project (“SPP”)
EB-2022-0248 – Mohawks of the Bay of Quinte First Nation Pipeline Project
(“MBQFNPP”)
EB-2022-0249 – Hidden Valley Pipeline Project (“HVPP”)
Updated Interrogatory Responses**

Enbridge Gas is in receipt of Environmental Defence’s (“ED”) May 4, 2023 e-mail, which posed several questions related to the Company’s May 2, 2023 interrogatory responses in the above noted proceedings. Upon further review, the Company is filing updates to the following interrogatory responses:

- EB-2022-0156 Exhibit I.ED.5, Attachment 2,
- EB-2022-0249 Exhibit I.ED.5, Attachment 4, and
- EB-2022-0156/EB-2022-0248/EB-2022-0249 Exhibit I.ED.15.

In its correspondence, ED also requested that Enbridge Gas provide updated responses to several interrogatories to confirm details of available grants and subsidies for non-natural gas alternatives.¹ Within Enbridge Gas’s May 2 responses to those interrogatories, the Company confirmed the information for programs that it is directly engaged in. Enbridge Gas cannot reasonably confirm details for programs it does not administer as program eligibility criteria can be complex and can change without the Company’s knowledge. Enbridge Gas did however provide links to publicly available information that the Company is aware of regarding the information sought by ED. As such, there are no updates the Company can provide to its responses for those interrogatories.

ED’s correspondence also requested that Enbridge Gas provide updated responses to several interrogatories to provide information regarding attachment scenarios at 50% of

¹ EB-2022-0156/EB-2022-0248/EB-2022-0249 Exhibit I.ED.17, part a); EB-2022-0156/EB-2022-0248/EB-2022-0249 Exhibit I.ED.20, parts a) – d); and EB-2022-0156/EB-2022-0248/EB-2022-0249 Exhibit I.ED.21, parts a) – b).

those established by the Company.² Within Enbridge Gas's May 2 responses to those interrogatories, the Company did not provide the information as the scenario suggested by ED is arbitrary and without basis. Enbridge Gas also stated, and continues to believe, that the requested information could likely only be used to draw oversimplified conclusions, as any adjustments made to the attachment forecast would result in other Project components/scope being reassessed and adjusted accordingly. Enbridge Gas reiterates that its attachment forecasts are based on the actual energy interests expressed by residents and business-owners within the Project areas, which inherently incorporate all factors including financial and non-financial considerations. Based on the foregoing, the Company has no reason to believe that its attachment forecasts are inaccurate and declines to provide the requested information based on the speculative scenarios suggested by ED.

ED's correspondence also requested that Enbridge Gas provide additional information regarding an updated response to an interrogatory that the Company indicated it would file by May 31, 2023.³ In this regard, Enbridge Gas has provided further relevant information in its May 16, 2023 letter which was submitted in response to Pollution Probe's May 9, 2023 letter.

Sincerely,

Eric VanRuymbeke
Sr Advisor, Leave to Construct Applications

c.c. Charles Keizer (Torys)
Henry Ren (Enbridge Gas Counsel)
Guri Pannu (Enbridge Gas Counsel)
Catherine Nguyen (OEB Staff)
Zora Crnojacki (OEB Staff)
Petar Prazic (OEB Staff)
Intervenors (EB-2022-0156/EB-2022-0248/EB-2022-0249)

² EB-2022-0156/EB-2022-0248/EB-2022-0249 Exhibit I.ED.13; and EB-2022-0156/EB-2022-0248/EB-2022-0249 Exhibit I.ED.14

³ EB-2022-0156/EB-2022-0248/EB-2022-0249 Exhibit I.ED.16, part e).