Ontario Petroleum Institute Inc.
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SENT BY EMAIL

June 14, 2023

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

Dear Ms. Marconi:

Re: Ontario Petroleum Institute (OPI) Staff Interrogatories
System Access Proceeding
OEB File Number: EB-2022-0094

In accordance with Procedural Order No. 6, please find attached the written interrogatories of the OPI on EGI's intervenor evidence in the above proceeding. This document is being sent to all registered parties to this proceeding.

Should EGI require any consent from an OPI member to be able to fully respond to any of the written interrogatories, please contact the writer at slewis@lagasco.ca or (519) 871-0876.

Yours truly,

[Original signed]

Scott Lewis, OPI Chairman

Encl.

Reference: EGI Evidence, Paragraphs 9 and 10

1. Does EGI have mandatory timelines or timeline targets for any communications related to: (a) producer connection requests; and (b) producer GPA shut-ins? Please note that this can include any step in the process of getting connected or shutting-in a producer (e.g., response to connection request, notice of shut-in, time to provide initial connection cost estimate, etc.).

   If yes, please provide:

   - The internal EGI document that establishes those timelines or targets for communication on these matters.
   - Examples where EGI has met those timelines or targets.

   If not, please provide the basis for EGI's disagreement noted in paragraph 10 of the EGI evidence.

2. Does EGI have a mandatory timeline or timeline target for responding to producers on available capacity when a producer requests to connect? If yes, please provide:

   - The internal EGI document that establishes the timeline or target.
   - Examples where EGI has met the timeline or target.

   If not, please provide the basis for EGI's disagreement noted in paragraph 10 of the EGI evidence.

3. Does EGI have a mandatory timeline or timeline target for providing producers who request a detailed cost estimate for meter stations with the detailed cost estimate? If yes, please provide:

   - The internal EGI document that establishes the timeline or target.
   - Examples where EGI has met the timeline or target.

   If not, please provide the basis for EGI's disagreement noted in paragraph 10 of the EGI evidence.

Reference: EGI Evidence, Paragraph 12

4. Please provide a detailed description of the analysis performed to determine winter and summer available capacity for local producers using highest design hour demand and lowest hour demand.

5. Please provide the output of this analysis for the Paton Pool/Shackleton Station estimate (discussed in OPI's evidence in this proceeding), specifying any assumptions that contribute to the available winter and summer capacity.

6. With respect to the Paton Pool/Shackleton Station connection request, the producer was advised by EGI that there was zero available market capacity in summer. In paragraph 12 of the EGI evidence, Enbridge states that summer capacity is calculated using lowest hour demand.

   (a) Can EGI confirm that in the Paton Pool/Shackleton Station area, the lowest hour demand leaves zero available local capacity?

   (b) If there is insufficient, non-zero demand to meet producer's requested injection, what is EGI's guiding assumption about how those demands are met (i.e., producer gas versus gas from the upstream distribution system).

   (c) Please provide the analysis outputs and communications regarding insufficient market availability associated with the Clearbeach Mabees Corners Station (which was discussed in OPI's evidence).

   (d) Please provide actual monthly flows from the Clearbeach Mabees Corners Station from January 1, 2018 through to December 31, 2020.

Reference: EGI Evidence, Paragraph 13 (Distribution Station Set Points)

7. Please explain how EGI sets the primary distribution station regulator pressure in relation to producer station regulator pressure to:

   (a) sequence first flow;

   (b) ensure needed pressure for reliability if upstream volumes are not available to the regulator;

   (c) ensure safety by capping the maximum pressure for safety including an automatic shutting off both distribution and producer regulators if limited demands are met.

8. Has EGI considered adjusting set points in the Paton Pool/Shackleton Station example referenced in OPI's intervenor evidence? If so,

   (a) please supply the results of this investigation; and

   (b) please explain whether EGI considers adjusting station outlet pressures in order to allow local producer stations to flow preferentially.

   If not, why not?

Reference: EGI Evidence, Paragraph 13 (Reinforcement)

9. Please provide examples of where Enbridge considered alternate locations (where there is more available capacity) in proximity to a producer request to access EGI's distribution system.

10. In the Paton Pool/Shackleton Station example cited in OPI's evidence, can Enbridge confirm that it has no alternate pipelines with a higher demand capacity within 10 km of connection request location?

Reference: EGI Evidence, Paragraph 23

11. Please confirm that: (a) "on a timely basis" does not refer to any mandatory timelines or timeline targets, and (b) EGI is not voluntarily proposing any such timelines or targets in this proceeding?

Reference: EGI Evidence, Paragraphs 24 to 27

12. Please confirm that for all gas at Dawn, even for gas stored at Dawn, that gas would:

    (a) Physically come from outside Ontario (if you cannot confirm, please explain);

    (b) Such gas needs compressor fuel to reach Dawn at some point between its origin and Dawn;

    (c) at some times during the year, such gas needs compressor fuel to go from Dawn to the EGI distribution system (to which the producer is connected).

13. Please confirm that local producer gas (including M13 and Lake Erie gate station deliveries) delivered to the local distribution system avoids EGI transmission system and storage system fuel gas, carbon tax on fuel gas and UFG?