

EB-2022-0157
Enbridge Panhandle Expansion Project

**Interrogatories of Environmental Defence
on Enbridge 2023 Evidence Update**

September 11, 2023

Interrogatory # 3-ED-24.

Reference: Updated evidence

Question(s):

- (a) Please provide updated responses to Exhibit JT2.3 and Exhibit JT2.7 or explain why they are not relevant.

Interrogatory # 3-ED-25.

Reference: Exhibit E, Tab 1, Schedule 6, Page 1 of 1

Question(s):

- (a) The updated evidence changed the cost per tonne for carbon for 2031 and beyond from \$170 to \$0 in Schedule 6. Please explain this change.
- (b) Please provide an update to Schedule 6 and all interrogatories and undertaking response based on Schedule 6 with the previous carbon price assumption of \$170 per tonne for 2031 and beyond.

Interrogatory # 3-ED-26.

Reference: Exhibit A, Tab 4, Schedule 1, Page 2

Preamble:

Enbridge states:

“On February 1, 2023, Enbridge Gas filed a letter stating that, following receipt of the new cost information, the Company also re-assessed the capacity position of the Panhandle System based on actual 2022 attachments and their system locations, as well as updated 2023 customer demand. As a result of that re-assessment, the Company anticipated that incremental demand for Winter 2023/2024 could be accommodated and that the Project’s in-service date can be deferred one year (from November 1, 2023, to November 1, 2024).”

Question(s):

- (a) Please provide a table showing the details of the re-assessed capacity position, including a before and after breakdown of the design hour and day demand by customer type.
- (b) Please provide a table showing the details of the re-assessed attachment figures, including a before and after breakdown by customer type.
- (c) Please provide Enbridge's best estimate for the reasons for the changed capacity position.

Interrogatory # 3-ED-27.

Reference: Exhibit A, Tab 4, Schedule 1, Page 4

Question(s):

- (a) Please provide a copy of the original and the revised EOI/ROS, highlighting the change in text.
- (b) Please provide a copy of all communications to customers referred to in paragraph 16 and all responses from customers.
- (c) Please explain why Enbridge undertook the steps described in paragraph 16 for the updated application but did not do so prior to filing the original application.
- (d) Please provide a breakdown of the changes that resulted from (i) more interruptible service, (ii) accounting for planned conservation, or (iii) other reasons.
- (e) Are the steps described in paragraph 16 the standard Enbridge practice?
- (f) Has Enbridge ever conducted the steps described in paragraph 16 before? If yes, please describe when and provide examples. If not, why not, and why start now?
- (g) Will Enbridge be conducting the steps described in paragraph 16 on a going forward basis?

Interrogatory # 3-ED-28.

Reference: Exhibit A, Tab 4, Schedule 1, Page 5

Question(s):

- (a) Please provide a copy of the detailed calculations and figures underlying the comments in paragraph 19, including the forecast and actual 2022 customer demands, the original and updated forecasts, and so on.
- (b) Please explain why Enbridge undertook the steps described in paragraph 19 for the updated application but did not do so prior to filing the original application.
- (c) Are the steps described in paragraph 19 the standard Enbridge practice?
- (d) Has Enbridge ever conducted the steps described in paragraph 19 before? If yes, please describe when and provide examples. If not, why not, and why start now?
- (e) Will Enbridge be conducting the steps described in paragraph 19 on a going forward basis?

Interrogatory # 3-ED-29.

Reference: Exhibit A, Tab 4, Schedule 1, Page 5-6

Question(s):

- (a) Please provide a copy of all correspondence to customers and all responses in relation to paragraphs 21 to 23.
- (b) Please provide a list of the customers that Enbridge communicated with in paragraphs 21 to 23 along with each customer's design day and design hour demand.
- (c) Why did Enbridge not ask customers whether they would be willing to contract for incremental capacity based if they had to pay \$X, with \$X being Enbridge's forecast of the CIAC that the customer would need to pay?
- (d) Please reach out to customers again and ask if they would still be interested in contracting for more capacity if they had to pay, with \$X being Enbridge's forecast of the CIAC that the customer would need to pay.
- (e) Please provide a table showing the CIAC per customer that would be necessary to achieve a PI of 1. Please make and state assumptions as necessary. Please also include a column with each customer's most recent annual gas costs (both commodity and delivery, or just delivery costs and volumes if they are a direct purchaser for which Enbridge does not have commodity costs) to contextualize the cost of the CIAC.
- (f) Please provide a table showing the CIAC per customer that would apply were the HAF rule to be applied here. Please make and state assumptions as necessary. Please also include a column with each customer's most recent annual gas costs (both commodity and delivery, or just delivery costs and volumes if they are a direct purchaser for which Enbridge does not have commodity costs) to contextualize the cost of the CIAC.

Interrogatory # 3-ED-30.

Reference: Exhibit B, Tab 1, Schedule 1, Page 10 of 22

Preamble:

Enbridge states:

“Contract rate customer demand makes up approximately 94% of the capacity of the proposed Project. As of May 2023, approximately 34% of the contract rate customer demand is underpinned by a firm distribution contract. The commitment letters received in 2021 are no longer being relied upon by Enbridge Gas as they were applicable to the former 2021 EOI process only. Based on the timing of the 2023 EOI process and updated leave to construct application, Enbridge Gas will be executing firm distribution contracts with customers that are requesting service in 2024 and 2025 first, followed by securing customer demands for the future years.”

Question(s):

- (a) Please provide a copy of JT1.33 that reflects the application updates and the current state of contracting.
- (b) Please provide add three columns to the answer to (a) with the following: (i) the forecast revenue associated with each customer's demand consistent with the forecast revenues underlying the DCF tables, (ii) the penalty that the customer would pay if they break the contract/commitment on day one and take no additional gas, and (iii) the penalty that the customer would pay if they break the contract/commitment 50% into the term and take no additional gas going forward.
- (c) Please provide a copy of the latest versions of the: distribution contract, letter of indemnity, and commitment letter that Enbridge is using in relation to this project.
- (d) Please provide a table with (i) an excerpt of any applicable penalty provisions and (ii) a description of the available penalties for the latest distribution contract, letter of indemnity, and commitment letter that Enbridge is using in relation to this project.

Interrogatory # 3-ED-31.

Reference: EB-2022-0157, Exhibit C, Tab 1, Schedule 1, Attachment 3,

Question(s):

- (a) Please provide an updated table of the forecast design day demand for the project area including a breakdown of demand attributable to (i) new greenhouses and (ii) existing greenhouses. Please also provide a breakdown of the greenhouses that are general service customers versus contract customers.
- (b) Please ask Posterity to estimate the design day demand reductions in the greenhouse gas sector that are (i) cost-effective (i.e. technical potential) and (ii) both cost effective and attainable (i.e. achievable potential). Please provide this estimate for at least the next five year, plus as long out into the future as is possible.
- (c) Please provide Posterity's answer to (b), identify the name of the Posterity witness, and provide their CV.

Interrogatory # 3-ED-32.

Reference: Updated evidence

Question(s):

- (a) Please review the answers to questions from Environmental Defence during the technical conference, advise if any answers are no longer accurate, and provide an accurate response to each of those.