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BY EMAIL AND RESS

registrar@oeb.ca

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

Dear Ms. Marconi:

**Re: Enbridge Gas Inc. (“EGI”) Panhandle Regional Expansion Project (EB-2022-0157) (“Proceeding”)
Association of Power Producers of Ontario (“APPrO”) Interrogatories**

We represent APPrO in relation to the above-noted Proceeding. Please find attached our interrogatories. Same have been filed by RESS on the OEB’s website.

Please contact the undersigned with any questions.

Yours truly,

BORDEN LADNER GERVAIS LLP

A handwritten signature in black ink that reads 'Colm Boyle' in a cursive script.

Colm Boyle

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Schedule B; and in particular section 90(1) and section 97 thereof;

AND IN THE MATTER OF an application by Enbridge Gas Inc. for an order granting leave to construct natural gas pipelines in the Municipality of Chatham Kent and Essex County.

INTERROGATORIES

Filed: September 11, 2023

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1 **INTERROGATORIES**

2 **APPrO-9:**

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

4 **Preamble:**

5 Enbridge's current position regarding the Contributions in Aid of Construction (CIAC) is that it is
6 not appropriate to require a CIAC from specific customers for the proposed project.

7 **Question(s):**

- 8 1. Is Enbridge aware of any customers that would be impacted by the change in OEB policy
9 to include a CIAC for future transmission projects, but are not part of this proceeding?

10 **APPrO-10:**

11 **Reference:** Exhibit A Tab 4 Schedule 1 Page 6 of 7; Exhibit E, Tab 1, Schedule 1, Pages 5, 17-
12 19; Directive - Order in Council 586/2023

13 **Preamble:**

14 "Customers submitting EOI bids for new/incremental service were generally doing so under the
15 assumption that the OEB would apply the established regulatory framework for transmission
16 system expansion projects, which does not require CIAC [...] No customer indicated that they
17 would be willing to provide CIAC for a transmission system expansion project without
18 understanding the magnitude of the CIAC and the unique justification for its selective application
19 in this instance."

20 According to Ministerial Directive 586 / 2023, "Southwestern Ontario, especially the Windsor-
21 Essex region is experiencing rapid growth in electricity demand from greenhouses as well as
22 investments in the lithium-ion battery and automotive sectors. According to IESO, peak electricity
23 demand in the Windsor-Essex and Chatham areas is forecast to grow from roughly 500 megawatts
24 in 2022 to about 2,100 megawatts in 2035, equivalent to adding cities the size of Ottawa and
25 London to the grid."

26 **Question(s):**

- 27 1. Enbridge Gas is forecasting continued demand growth from commercial, industrial, and
28 residential customers located in the areas west of Dawn, with concentrations in the
29 Municipalities of Windsor, Leamington, and Kingsville related to greenhouse, automotive
30 and power generation.

- 1 a) Please describe what impacts may occur if the project is not approved or if the OEB
2 does not apply the established regulatory framework for CIAC for transmission
3 system projects noted in the preamble. Please discuss the economic, employment
4 and tax revenue impacts on the local and provincial economies.
- 5 b) Did any Enbridge receive any feedback from potentially affected customers
6 regarding the same? If so, please describe what may happen to projects proposed
7 by third parties (e.g., Stellantis) if the project is not approved or if the OEB does
8 not apply the established regulatory framework for CIAC for transmission system
9 projects.
- 10 2. Please provide copies of Orders in Council 1348/2022 and 586/2023 from the Ontario
11 Minister of Energy approved and ordered, respectively, on October 6, 2022 and April 27,
12 2023.
- 13 3. Given the potential that a number of gas-fired capacity additions may not be feasible if the
14 project is not approved or a significant CIAC is requested, has Enbridge considered the
15 following:
- 16 a) The reliability and cost impacts to the Ontario electricity system and electricity
17 customers if the generation capacity the IESO has been directed by the Minister of
18 Energy to procure, or is already contracted through its authorized planning and
19 procurement processes, must be replaced?
- 20 b) How will this financial impact flow to electricity ratepayers and potentially impact
21 the calculations underpinning the Stage 2 and 3 figures?

22 **APPrO-11:**

23 **Reference:** Exhibit A, Tab 4. Schedule 1, Page 5

24 **Preamble**

25 “Following the Application being placed into abeyance in December 2022 (at the Company’s
26 request), Enbridge Gas re-evaluated existing system capacity based on the impact of actual 2022
27 customer demands, updated forecast demands, updated SWAHV, and supply volumes on the
28 Panhandle System. As a result of this assessment the Company found that:”

29 **Question(s):**

- 30 1. Please provide a detailed description of the SWAHV and other supply/demand changes
31 that occurred between the original application for the project and the update that resulted
32 in an additional 24 TJ/day of capacity on the Panhandle system.

- 1 2. Please describe future changes to supply/demand conditions that may result in additional
2 capacity to be made available on the existing Panhandle system.
- 3 a) If Enbridge does not expect further changes to the capacity of the Panhandle
4 system, please explain why.

5 **APPrO-12:**

6 **Reference:** Exhibit D Tab 1 Schedule 1 Page 3 of 11; Exhibit A Tab 4 Schedule 1 Page 6 of 7

7 **Preamble**

8 “The Project will commence at the existing Enbridge Gas Dover Transmission Station located 40
9 km southwest of the Dawn Hub at Balmoral Line and Town Line Road in Chatham-Kent, Ontario.
10 The pipeline will loop the existing NPS 20 Panhandle Line, following existing easements where
11 possible, for approximately 19 km to Richardson Sideroad in Lakeshore, Ontario where it will tie
12 into the existing NPS 20 Panhandle Line at a new valve site station.”

13 **Question(s):**

- 14 1. As a line loop, APPrO understands that all customers who receive service from the
15 proposed project will use both the existing NPS 20 and new NPS 36 legs of the pipeline.
16 Please confirm that all customers downstream of the project will utilize the project for the
17 provision of gas delivery service, not just the customers submitting EOI bids for
18 new/incremental service.
- 19 2. Please describe benefits existing customers will receive from the project (e.g., enhanced
20 reliability, spreading OM&A costs over more customers / volumes, etc.).

21 **APPrO-13:**

22 **Reference:** Exhibit B Tab 2 Schedule 1 Page 15 of 16

23 **Preamble**

24 Paragraph 33 refers to “Attachment 1”, which is a Winter 2024/2025 Panhandle System schematic
25 showing the network analysis for the Panhandle System assuming no reinforcements are
26 completed.

27 **Question(s):**

- 28 1. Please provide Attachment 1.