



BY EMAIL and RESS

Mark Rubenstein
mark@shepherdrubenstein.com
Dir. 647-483-0113

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

September 11, 2023
Our File: EB20220157

Attn: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: EB-2022-0157 – Enbridge Inc – Panhandle LTC – SEC Interrogations

We are counsel to the School Energy Coalition (“SEC”). Pursuant to Procedural Order No. 6, attached please find SEC’s interrogatories in this matter.

Yours very truly,
Shepherd Rubenstein P.C.

Mark Rubenstein

cc: Brian McKay, SEC (by email)
Applicant and intervenors (by email)

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

ON BEHALF OF THE

SCHOOL ENERGY COALITION

SEC-1

[E-1-1, p.1] Enbridge states that: “The costs are based upon a class 3 estimate prepared in Q1 2023, updated to reflect market conditions based on Q4 2022 contractor responses to RFP”.

- a. How many contractors responded to the RFP and what was each of their bids?
- b. Is the contract work being undertaken as part of Enbridge’s ‘Alliance Partners’ contracts?
- c. Please explain the structure of the contracts and the specific details regarding allocation of cost risk.

SEC-2

[E-1-2] With respect to the updated project costs and scope:

- a. Please provide a table that shows, broken down by category, a comparison of projects costs in the original and updated application, limited to the project scope included in the updated application.
- b. Please provide a detailed explanation of costs increased, by category, including in part (a).

SEC-3

[A] Please provide a copy of the following documents:

- a. Any internal project business cases.
- b. All material provided to Enbridge’s executive management team or Board of Directors to seek approval for the updated project.
- c. All material provided to Enbridge Inc. regarding the updated project.

SEC-4

[Cover Letter, June 16, 2023] With respect to the Leamington Interconnect, Enbridge states: “Following Enbridge Gas’s re-assessment of the Project in 2022 and 2023, the Company has elected to remove the Leamington Interconnect from the scope of the proposed Project and will reassess its need in the future should projected system shortfalls come to fruition and warrant its reconsideration.”

- a. Please provide a detailed explanation of why Enbridge chose to remove the Leamington Interconnect from the scope of the proposed project.
- b. Please confirm that based on the Capital Update filed in EB-2022-0200, the Leamington Interconnect project is forecast to be completed in 2026 at a cost of \$118.8M (see EB-2022-0200, 2.6-CCC-71, Attach 1, p.6 (2023-07-06)).
- c. Please reconcile part (b) with the statement that Enbridge will reassess its need in the future.
- d. Please provide a revised DCF Analysis (E-1-5) that includes the cost of the Leamington Interconnect based on the costs forecast in the Capital Update of the EB-2022-0200 application. Please provide all supporting calculations and the DCF Analysis in Excel format.

SEC-5

[A-4-1, p.5-6] Enbridge states: “Following the OEB’s remarks in Procedural Order No. 4 regarding CIAC, Enbridge Gas account managers conducted outreach to customers who indicated their intention to submit an EOI bid. Customers were asked about the impact a requirement for CIAC would have on their demands for new/incremental service.”

- a. Please provide a copy of all correspondence and any notes of discussions between Enbridge and customers regarding the potential requirements for a CIAC payment.
- b. Please provide a copy of all instructions and/or guidance provided to Enbridge Account managers regarding the OEB’s comments in Procedural Order No. 4.

SEC-6

[E-1] Please provide a copy in Excel, with all formulas intact, of Schedules 4-7.

Respectfully, submitted on behalf of the School Energy Coalition, this September 11, 2023.

Mark Rubenstein
Counsel for the School Energy Coalition