



September 28, 2023

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

Dear Ms. Marconi:

Re: EPCOR Natural Gas Limited Partnership

Brockton Expansion – Leave to Construct Application Ontario Energy Board File Number: EB-2022-0246

Pursuant to Procedural Order No. 1 to the above noted proceeding, Enbridge Gas hereby submits its interrogatories to EPCOR Natural Gas.

Should you have any questions on this submission, please do not hesitate to contact me.

Yours truly,

Patrick McMahon Technical Manager, Regulatory Research and Records <u>patrick.mcmahon@enbridge.com</u> (519) 436-5325

c.c. (email only): Tim Hesselink, EPCOR Utilities Inc.

Daniela O'Callaghan, EPCOR Utilities Inc.

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## ENBRIDGE GAS INC. INTERROGATORIES TO EPCOR NATURAL GAS

1. Reference: EPCOR Application, Exhibit B, Tab 1, Schedule 1, Pages 2 and 3 and Table 1

"In January 2020, The Municipality of Brockton retained Innovative Research Group, an independent third party market research group to conduct the "Brockton Natural Gas Line Load Forecasting Survey" (the "Survey"), a market survey to gauge the interest of residents and business in natural gas distribution service and conversions. The Survey was completed with the support of EPCOR, and was used in the development of the Project application for Phase 2 NGEP. The results of the Survey are summarized in Attachment 1 of this Exhibit."

[...]

- "9. Results from the Survey indicate that in the survey area the split between fuel sources for residents is currently 41% propane forced air, 18% wood stove/fireplace, and 12% oil forced air. 89% of respondents indicated that they would be likely (definitely or somewhat likely) to convert to natural gas if it were made available. Cost savings were the primary reasons cited by respondents who reported that they would likely convert to natural gas if it were made available.
- 10. EPCOR also conducted its own in-person interviews with large agricultural customers, including those that currently have grain drying facilities or requirements to heat production barns. Of the total of four such customers contacted before EPCOR submitted its NGEP application, all indicated an interest in converting to natural gas once it became available. These customers generally use propane as their major heat source at this time. Letters of support from these customers are included in Attachment 2 of this Exhibit."

## Questions:

- (a) What are the estimated payback periods for the costs of converting from the Alternative Energy Sources listed in Table 1 to natural gas? How many contractors are available in the project area to undertake the proposed conversions?
- (b) The letters of support from the Ontario Federation of Agriculture and its constituents included in Attachment 2 date back over 3 years. Have there been any updates on the support of these potential customers?
- 2. **Reference**: EPCOR Application, Exhibit B, Tab 1, Schedule 1, Page 5 and Exhibit E, Tab 1, Schedule 1, Page 4
  - "18. The Project has been selected by the Government of Ontario to support the NGEP and is designed to expand access of safe, reliable, and affordable natural gas to unserved areas of Ontario. The need for the Project is supported by EPCOR's market research which demonstrates the affordability of natural gas relative to alternative energy sources for customers in Municipality of Brockton, Municipality of West Grey, Municipality of Kincardine, and Township of Arran-Elderslie."
  - "13. Based on the forecast of the Project's costs and revenues, before program funding the Profitability Index ("PI") is 0.28. With program funding the PI is 1.0 with a NPV of \$0."

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## Question:

Please confirm that EPCOR would not pursue the proposed project without the NGEP contribution.

3. Reference: EPCOR Application, Exhibit B, Tab 1, Schedule 1, Attachment 2, Page 7

"Over the past 25 years we have talked to Union Gas/Enbridge people on a couple of occasions. Union Gas had an expansion/sales office just north of Mildmay in the old township office over 20 years ago where I talked to 2 representatives. They told me they were evaluating South Bruce for the potential of expansion for that area but there were no plans for my area. Several years ago we contacted Enbridge again and asked about getting gas to our farm in the north end of Brockton and they assured me we would never get natural gas."

## Question:

Please provide documentation supporting the claims made by Berry Bush Farms as submitted by EPCOR in the application.