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**File No. 061604.54**

October 20, 2023

**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”) Integrated Resource Planning Pilot Projects  
OEB File No.: EB-2022-0335 (“Proceeding”)  
Association of Power Producers of Ontario (“APPrO”) Interrogatories**

We represent APPrO in relation to the above-noted Proceeding. Please find attached our interrogatories filed pursuant to Procedural Order No. 2. 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'. The signature is written in a cursive style with a large initial 'C'.

Colm Boyle

cc: All parties in EB-2022-0335

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Schedule B; and in particular section 36 thereof;

**AND IN THE MATTER OF** an application by Enbridge Gas Inc. for an order or orders approving the cost consequences of Integrated Resource Planning (“IRP”) Plans for IRP Pilot Projects in the Town of Parry Sound, and the City of Sarnia and Town of Plympton-Wyoming.

**INTERROGATORIES OF THE ASSOCIATION OF POWER PRODUCERS OF  
ONTARIO**

**Filed: October 20, 2023**

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1 **INTERROGATORIES**

2 **APPrO-1:**

3 **Reference:** Exhibit C Tab 1 Schedule 2 Page 1 of 8.

4 **Preamble:** “Ultimately, the Company determined that the Pilot Projects would primarily be  
5 focused on gather transferrable learnings regarding IRPA design, performance and potential for  
6 scalability, including insights on peak flow reductions from demand-side IRPAs (i.e., ETEE and  
7 DR programs).”

8 The reference below to “large volume customers” are those who take service as a large customer  
9 under Rate 20, 100, 125, T2 or M12.

10 **Question(s):**

- 11 1. Can the proposed Parry Sound Pilot Project be scalable to large volume customers? If so,  
12 please provide a description of the scale required (e.g., number of CNG trailers).
- 13 2. Can the proposed Southern Lake Huron Pilot Project be scalable to large volume  
14 customers? If so, please provide a description of the scale required (e.g., number of CNG  
15 trailers).
- 16 3. Explain how the learnings from these Pilot Projects may be transferable to avoid, delay, or  
17 reduce facility projects for demand from large volume customers.
- 18 4. Will any ETEE programs be applicable to large volume customers? If so, please explain.
- 19 5. Are there any large volume customers in the “Area of Influence” in either of the Parry  
20 Sound Pilot Project or the Southern Lake Huron Pilot Project?
- 21 6. Given the size of the existing pipelines, could a large volume customer currently connect  
22 to either the Parry Sound Pilot Project or the Southern Lake Huron Pilot Project in the  
23 “Area of Influence”?

24 **APPrO-2:**

25 **Reference:** Exhibit C Tab 1 Schedule 1 Page 1 of 4; Exhibit D Tab 1 Schedule 1 Page 6 of 34

26 **Preamble:**

27 “Approximately 240 m<sup>3</sup>/h of CNG volumes would be required to be injected at the Parry Sound  
28 distribution system in 2025 on a design day. To reliably deliver the required CNG volumes, two  
29 CNG tube trailers with two smaller decanting trailers are proposed to be located on-site, where  
30 one trailer serves as the primary source of supply and the second trailer serves as a backup. Each

1 trailer would have adequate supply to support peak demand independent of the other. A third trailer  
2 will be brought in if the system flows enough gas to deplete one of the two trailers. Trailer volumes,  
3 pressures and decanting of trailers will be remotely monitored to ensure continued safe and reliable  
4 operations.”

5 **Question(s):**

- 6 1. What is the volume of CNG that can be held within a CNG tube trailer?
- 7 2. How long would it take to deplete the CNG tube trailer based on the anticipated  
8 consumption rates for the Pilot Projects?
- 9 3. How will the CNG tube trailers be refilled once they are depleted?
- 10 4. Are there any reliability concerns with the use of CNG tube trailers (e.g., inclement winter  
11 weather on local roads)?
- 12 5. Will the CNG tube trailers provide an equivalent level of reliability as the baseline facility  
13 alternatives?

14 **APPrO-3:**

15 **Reference:** Table 13, Exhibit E Tab 1 Schedule 1 Page 18 of 19

16 **Question(s):**

- 17 1. Please confirm that the Southern Lake Huron Project has a lower net present value than the  
18 baseline facility alternative.
- 19 2. If (1) is confirmed, justify why the baseline facility alternative was not selected given it is  
20 the less expensive option.

21 **APPrO-4:**

22 **Reference:** Exhibit D Tab 1 Schedule 1 Page 1 of 34

23 **Preamble**

24 “Enbridge Gas has incorporated two supply-side IRPAs as part of the Parry Sound Pilot Project:  
25 (i) a negotiated increased pressure agreement from TCE; and (ii) CNG injection, to defer the  
26 identified system need/constraint during the Pilot Project term. The higher-pressure agreement  
27 from TCE and the use of CNG injection will ensure that Enbridge Gas can reliably meet the system  
28 demand requirements while the impacts to peak hour demand through demand-side IRPAs are  
29 being tested.”

1 **Question(s):**

- 2 1. Will the baseline facilities still be needed after the end of each of the Pilot Projects' term?
- 3 2. If the answer to (1) is yes, what is more economic for customers in relation the issue  
4 identified in the Parry Sound Pilot over the next 20 years:
- 5 a) Installing the baseline facilities only; or
- 6 b) Installing the Pilot Project and deferring the installation of the baseline facilities to  
7 a future date?
- 8 3. Please perform the same analysis in (2) for the Southern Lake Huron Project.
- 9 4. Please calculate the economics on a net present value basis and set out the assumptions for  
10 (2) and (3).

11 **APPrO-5:**

12 **Reference:** Exhibit D Tab 1 Schedule 1 Page 9 of 34; Exhibit E Tab 1 Schedule 2 Attachment 4

13 **Preamble**

14 “Within the large natural gas consumer segment (greater than 100,000 m<sup>3</sup> annual consumption),  
15 there is one institutional customer that accounts for a significant percentage of the system load in  
16 the Parry Sound Pilot Project area. Variations in energy demands from these types of consumers  
17 can fundamentally influence identified system needs/constraints. Further, in Enbridge Gas’s  
18 experience, energy efficiency projects with large consumers typically provide the highest potential  
19 savings opportunity per project compared to small consumers. As such, special consideration for  
20 this institutional customer in the form of assistance from qualified Enbridge Gas staff will be given  
21 due to the impact this customer has on the Parry Sound distribution system.”

22 **Question(s):**

- 23 1. Please provide the annual consumption of this large natural gas consumer.
- 24 2. What “assistance” will this large natural gas consumer need?
- 25 3. Who would be considered “qualified Enbridge Gas staff”?
- 26 4. How are large customers treated differently? What is the nature of this customer’s  
27 business?
- 28 5. What is the annual volume of the largest customer in the Area of Influence for both Pilot  
29 Projects?

- 1 6. The bill impacts in Exhibit E Tab 1 Schedule 2 Attachment 4 show that all the “small”  
2 customers have consumption greater than 100,000 m<sup>3</sup>. Why is the natural gas consumer  
3 segment greater than 100,000 m<sup>3</sup> annual consumption considered “large”?