

REF: Exhibit B, Tab 1, Schedule 1, pg. 7

Preamble: EGI evidence states: “*Enbridge Gas is currently utilizing a supply-side IRPA consisting of negotiated increased contracted pressure from TCE to avoid a system reinforcement⁷; however, TCE notified Enbridge Gas that the delivery pressures will be returned to their standard tariff pressure of 4,000 kPa for the Winter of 2023/24. As explained further in Exhibit D, Tab 1, Schedule 1, Enbridge Gas has requested a higher-pressure service from TCE to maintain the supply-side IRPA.*”

We would like to understand more about the delivery pressure agreement and subsequent attempts to mitigate the impact of the proposed reduction.

- 1) Please file the 2017 agreement.
 - a) Please file EGI’s written request for a higher pressure.
 - b) Please file TCE’s response to EGI’s request
 - c) Please file any further communication with regard to mitigating the reduction as much as technically and commercially feasible.

REF: Exhibit B, Tab 1, Schedule 1, pg. 12 and Exhibit C, Tab 1, Schedule 1, Figure 2

Preamble: EGI evidence states: *The Company’s 2023-2032 AMP identified a growth project to address a system constraint in the SLH Area of Influence in response to forecasted increased market/customer demand:*

A new distribution station off of the existing 1,210 kPa system and a main extension to tie into the 420 kPa system north of Sarnia along the water is required.¹²

We would like to understand the system constraint being addressed.

- 2) Please provide a simpler map that shows the system, the constraint and the location of proposed station including its 1,210 kPa feed and the location of proposed main.
 - a) Please provide the most recent system model verification for the network that feeds the area of influence and the proposed additional main.

REF: Exhibit B, Tab 1, Schedule 1, Figures and Exhibit C, Tab 1, Schedule 1

Preamble: To evaluate the proposed project and alternatives, one would need enhanced information regarding the forecasted flows and other parameters that the define the need that is being addressed in this application for Parry Sound.

- 3) Please file the most recent system verification study for:
 - a) The HP system from Emsdale to Parry Sound Town Border Station
 - b) The HP system from the Parry Sound Town Border Station to the District Regulating Stations.
 - c) The IP system that includes the low point that causes the system constraint.
- 4) Please provide the forecasted peak hourly demand for each winter from 2023/24 to 2031/32 for the following paths:
 - a) Emsdale Station to the Parry Sound Town Border Station
 - b) Parry Sound Town Border Station flowing to each of the 4 distribution stations to the Northwest depicted in Figure 2.
 - c) Parry Sound Town Border Station flowing to each of the 2 distribution stations to the Southeast depicted in Figure 2.
- 5) Please provide the network analysis of both the steady state and unsteady state models that provide the resulting pressures and flows across all of the years analyzed for this application. Please ensure that the analysis output provides the specific winter pressures and flows at the following locations, before and after each of the proposed modifications in Exhibit C (for 2025, 2027 and 2030) have been completed:
 - a) At the inlet and outlet of the Emsdale Station (currently and after proposed)
 - b) At the end of the 11.6km NPS 6 HP St on the source pipe
 - c) At the inlet to the Parry Sound Town Border Station
 - d) The outlet pressure of the Parry Sound Town Border Station
 - e) The inlet to the Miller Street District Regulating Station
 - f) The outlet of the Miller Street District Regulating Station
 - g) The pressure at the low point of the 420 kPa system.
- 6) The 2027 Pipeline Reinforcement is proposed to be the replacement of 11.5 km of NPS 4 pipe with NPS 6. Please provide the length of pipe that would be required if the NPS 4 was looped with NPS 6 instead of replacing.
 - a) Please describe the relative costs of looping vs. replacing.

- 7) Please clarify if modifications to the Parry Sound Town Border Station were considered.
- a) If so, please provide the design parameters (minimum inlet and maximum outlet pressures and flows), the nature of the work and the cost estimate for the work.
 - b) If not, please provide the design parameters and the make, model and size (including regulator orifices if applicable) of the operating current equipment (meter, filter, regulators, etc.) and any considered changes.
 - i) Please provide the resulting design parameters with the considered changes, the estimated cost of the changes and the reasons for rejecting the alternative.
- 8) Please clarify if the largest customer has contract rate.
- a) If so, is there currently any interruptible hourly demand in their contract.
 - b) If not, please describe any discussions that EGI has had with any customer to consider moving to an interruptible rate including the potential for a negotiated rate.
- 9) We understand that there is a hospital served by the Parry Sound system.
- a) Please confirm that Ontario requires hospitals to have a minimum amount of back-up fuel for emergency conditions.
 - b) Please clarify that amount of time established as a minimum.
 - c) Please describe any discussions that EGI has held with the hospital to incent them to use their back-up capability to move a portion of their load to an interruptible contract.

REF: Exhibit D, Tab 1, Schedule 1, p. 6

Preamble: EGI describes the use of CNG as an alternative. We would like to understand more about EGI's current experience with this approach and its potential application in Parry Sound.

- 10) Please provide information on current CNG installations that EGI currently has implemented including forecasted design utilization versus actual utilization.
- a) Please provide any operational issues that arose from utilization.
 - b) Specific to the potential Parry Sound application, please provide the standard cubic meter of inventory that one trailer would hold
 - c) Please provide the cost of one trailer of the suitable size to deliver the forecasted 240 m³/hr.

REF: Exhibit D, Tab 1, Schedule 1, p. 25 and 30

Preamble: We would like to understand the value proposition with heat pumps.

- 11) In a simple table, please provide the range(s) of efficiency for electric and gas air-source heat pumps and their range of impact on the peak hour demand for a residential customer.
- a) Do these reductions include diversification associated with reduced demand for gas source heat pumps relative to the variability in the on/off cycles of a traditional gas furnace?
 - i) If not, please provide a quantitative or qualitative assessment of that aspect.

REF: Exhibit D, Tab 1, Schedule 2, p. 8-13

Preamble: We would like to understand the potential efficacy of an enhancement to the proposed DR program.

- 12) From the jurisdictional scans undertaken, does any system operator consider raising the temperature on the thermostat a degree or two in the hour prior to the 2-degree turnback in 7-10am time period?
- a) Please describe fully along with EGI's thoughts on the potential efficacy of that approach as it pertains to customer acceptance and peak hour impact.

REF: Exhibit D, Tab 1, Schedule 3, p. 2

Preamble: EGI evidence states: *“Currently at a system level, daily to peak hour conversion factors and profiles are recalculated annually using actual hourly gate station flows. This unique nondimensional profile represents all of the customers downstream of the gate stations combined. While this is a good representation of the entire customer group downstream of the gate station on systems, granularity at a customer level and their change in usage is unavailable.”*

We would like to understand a baseline for the data and the process of conversion to peak hour load.

- 13) In Excel format, please provide the hourly flow for the Parry Sound system along with the temperature and wind speed for that hour for January and February of the

last 3 winters and the flow and temperature for July and August for the last 3 summers.

- a) Please provide a description and calculations associated with the determination of the peak hourly demand of the Parry Sound system.
- b) Please comment on efficacy and limitations of this type of data for single feed distribution systems.

14) Please describe the difference between a non-steady state (transient) model and a steady state model as it pertains to system design including concepts such as linepack.

- a) Using the data from the last three years, please provide an example of the analysis that can be undertaken to reconcile the derived peak hour flows and pressures between the Emsdale station and the Parry Sound Town Border station for a non-steady state (transient) model and a steady state model.
- b) Please comment on what EGI has learned from the development of a non-steady state model for the Parry Sound high pressure feed.

REF: Exhibit D, Tab 1, Schedule 3, p. 3 and Exhibit E, Tab 1, Schedule 1, pg. 8

Preamble: EGI evidence states: *“In the Southern Lake Huron Pilot Project area, most residential and small commercial customers are equipped with existing ERTs. These existing ERTs were previously only read at the same bi-monthly frequency but have presently been configured to start recording hourly data. Within the SLH Area of Influence, an additional installation of approximately 940 residential ERTs is required. In the remaining Sarnia area, additional installation of approximately 360 hourly measurement devices is required, primarily for the larger commercial and industrial customers.*

We would like to understand the cost effectiveness of the broad installation of ERT's.

15) Please provide a map that shows:

- a) The critical low point(s) of the Area of Influence
- b) The location of all distribution stations feeding that area
- c) An indication of which of those distribution stations has flow measurement that can provide hourly flow
- d) If there are any distribution stations that do not have flow measurement, please provide an estimate, based upon a similar flow measurement installation in the EGI system in recent years, for the cost of adding flow measurement at stations that currently are not equipped.

- 16) For those stations that have hourly flow measurement, please provide the hourly flow and corresponding temperature for the ten coldest days in the three years.
- a) Please provide with the data, EGI's current determination of the peak design hour for each station of the distribution system.
 - b) Please comment on how EGI will use the additional flow information from the hundreds of additional ERT's to improve the establishment of the peak design hour.
 - c) Please comment on the cost effectiveness of these additional ERT installations for future projects.
 - d) Please confirm that, through this pilot application, EGI is not seeking data to support nor the approval of Advanced Metering Infrastructure (AMI) for all customers served by future projects contemplating IRPA's.
 - i) If not confirmed, please provide specifics on the objectives and approvals sought for full deployment of technology providing hourly meter reading for substantial percentages of customers served by a potential IRPA.

REF: Exhibit E, Tab 1, Schedule 2, p.4-5

Preamble: EGI evidence states: *“Enbridge Gas proposes to allocate the IRP Operating Costs and the IRP Capital Costs deferral account balances related to the Parry Sound Pilot Project to Union North rate classes in proportion to the system peak and average day demands, excluding the demands of customers who are served by sole use mains. The proposed cost allocation methodology is consistent with the allocation of joint use mains in the Union North rate zone in Union’s 2013 OEB-approved Cost Allocation Study.*

Enbridge Gas proposes to allocate the IRP Operating Costs and the IRP Capital Costs deferral account balances related to the Southern Lake Huron Pilot Project to Union South in-franchise rate classes in proportion to Union South design day demands, excluding design day demands served directly off transmission lines. The proposed cost allocation methodology is consistent with the allocation of distribution mains in the Union South rate zone in Union’s 2013 OEB-approved Cost Allocation Study.”

Preamble: We would like to understand better the principles behind these proposals and the consistency of these proposals.

- 17) In the first excerpt, EGI proposes to allocate the costs “*in proportion to the system peak and average day demands*”. Please clarify, this statement relative to proportionality of the peak vs. the average or some other interpretation.
- a) Given the above answer, please clarify the difference between the Parry Sound and South Huron proposed allocations associated with peak design day demands.
 - b) Please provide EGI’s views on adopting these methodologies as compared to what was proposed in the Rebasing Application.

REF: Exhibit F, Tab 1, Schedule 1, p.1 and
EB-2022-0200, EGI_ReplyArg_2024 Rebasing_20231011, pg. 55

Preamble: In the second reference, EGI argues that the company “*Developed and rolled out its Pilot Project Area Stakeholder Engagement Plan and delivered initial webinars with pilot project stakeholders, including meetings with municipalities, LDCs, IESO, Hydro One, in-person public meetings and meetings with municipal councils;* “

- 18) Please file copies of all of the information and materials provided by EGI to stakeholders in these engagement exercises.