

VIA RESS

November 4, 2023

Ontario Energy Board
Attn: Ms. Nancy Marconi, OEB Registrar
P.O. Box 2319
27th Floor, 2300 Yonge Street
Toronto ON M4P 1E4

**RE: EB-2022–0157 EGI Panhandle Regional Expansion Project
Request for Responses to Interrogatories and Supplemental**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in preparation for the hearing scheduled by the Board’s Procedural Order No. 8.

FRPO is concerned that the number and sources of evidence through the evolution of this proceeding creates difficulty in ensuring the record is clear enough to allow informed determinations. In our cross-referencing and reconciliations of this evidence, we perceive gaps in the evidence that are technical in nature. Without the benefit of a technical conference, we are concerned that the evidence will not be in front of the Board in a way that allows clear discovery and resulting understanding. As such, we are advancing a request for complete interrogatory responses to be filed no later than November 9th to aid in preparation in the interest of clarity and effectiveness at the hearing.

Request for Evidence on Summer Operations of the Panhandle System – FRPO.29

In Exhibit I.FRPO.29, we requested the Applicant provide results of their “simulations for both summer and winter” in schematic form and assumptions used to optimize the system. While the Applicant provided evidence from the winter simulations, the requested information for summer was not provided as the interrogatory response closed with:

“Summer is not relevant regarding the Panhandle design day analysis.”

Respectfully, we did not refer to design day analysis and the preamble referred to evidence on the company’s views of the efficacy of Ojibway supply. The Applicant is aware that FRPO and other parties have requested consideration of supply-side Integrated Resource Planning (IRP) alternatives which could contribute to reducing the cost of Panhandle expansions.¹ Further, EGI has stated in several places in evidence that the market available in the summer limits the ability to secure annual firm deliveries at Ojibway.² Therefore the summer design conditions are important and **relevant** to an IRP view of system design. Consequently, we request that the schematic along with all pressures, flows and assumptions be filed prior to the hearing.

¹ Exhibit I.ED.6, FRPO.4 and EB-2016-0186 FRPO_ARG_PANHANDLE_20161214

² Exhibit I.FRPO.9

Request for Evidence - Difference in Demand Forecast and Project Design – FRPO.4, 5 & 18

In last year's discovery, FRPO sought to understand if the project could be staged in an economically rational manner by asking for schematics with pressure and flow information on the individual segments (separate NPS 36 and NPS 16 segments) proposed³. Results were not provided for the end of the forecast horizon for the NPS 36 segment only in the Winter of 2030/31 citing an "*infeasible result*" due to a shortfall of 67 TJ/d.⁴

However, in this year's updated application, the NPS 36 is proposed on its own. Our request to try to understand the evolution of the project resulted in the limitation to provide the simulation results for the end of the demand horizon once again citing a shortfall, in this case of 56 TJ/d in Winter 2033/34⁵. The response informed that the last year of sufficient capacity is expected to be Winter of 2028/29.

To try to bring clarity to the changes in this update application versus the original, using the respective forecasts for Winter of 2028/29 from each forecast individually, please provide the simulation results for pressures at and demands for each lateral including assumptions using the NPS 36 only and for NPS 16 added to the NPS 36. Please ensure data from all scenarios are provided even if lower pressures than design for any lateral. Please provide all pressure and demands in one table for each lateral for each individual scenario (total of 4) and provide the reason(s) that account for significant differences.

We trust our requests are clear and request that EGI provide confirmation of its willingness to provide the requested evidence by November 9th early this coming week. Please contact us in the interim if there is any lack of clarity in these requests.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. H. Ginis, EGIRegulatoryProceedings – EGI
L. Murray, Z. Crnojacki - Staff
Interested Parties – EB-2022-0157

³ Exhibit I.FRPO.4 and .5

⁴ Exhibit I.FRPO.5 a) i)

⁵ Exhibit I.FRPO.18