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Enbridge Gas Inc.
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VIA EMAIL and RESS

November 7, 2023

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (“Enbridge Gas” or the “Company”)
Ontario Energy Board (“OEB”) File No. EB-2022-0157
Panhandle Regional Expansion Project (“Project”)
Response to Federation of Rental-housing Providers of Ontario (“FRPO”)**

Enbridge Gas is in receipt of FRPO’s letters dated November 4 and 6, 2023, and the Association of Power Producers of Ontario’s (“APPrO”) letter dated November 5, 2023 which responded to FRPO’s November 4, 2023 letter.

FRPO’s letters state that it perceives gaps in the proceeding’s evidence and that without a Technical Conference it is concerned that the evidence will not be in front of the OEB in a way that allows for clear discovery and understanding. FRPO makes two requests:

1. FRPO submits that Enbridge Gas’s response to Exhibit I.FRPO.29 is incomplete because the interrogatory requested simulations for both winter and summer, while the Company only provided winter simulations. FRPO requests that Enbridge Gas file the schematic along with all pressures, flows and assumptions no later than November 9, 2023.
2. FRPO submits that it is seeking clarity regarding changes between the initial proposed project and the updated proposed Project. Specifically, FRPO makes a new request for Enbridge Gas to file simulation results comparing the initial proposed project (which consisted of the Panhandle Loop and the Leamington Interconnect) to the updated proposed Project (which consists of the Panhandle Loop only and not the Leamington Interconnect), using the initial and updated demand forecasts, no later than November 9, 2023.

APPrO’s letter states that:

- It does not agree with FRPO’s characterization that the evolution of this proceeding creates difficulty in ensuring the record is clear enough to allow for informed determinations;
- There are no material gaps in the evidence, despite FRPO’s attempt to cast doubt over the clarity of the proceeding’s record;

- Even if a lack of technical clarity exists, which APPrO does not agree with, the hybrid hearing process will allow the OEB Panel to clarify any gaps if they exist; and,
- The OEB should reject FRPO's requests as these are matters FRPO can raise during the hybrid hearing.

Enbridge Gas agrees with APPrO and submits that it should not be required to respond to FRPO's requests in advance of the hybrid hearing.

Regarding FRPO's first request, Enbridge Gas has already provided sufficient information¹ regarding the issue being explored by FRPO and submits that the summer simulation results requested are not relevant to determining the minimum summer market. FRPO can seek clarification regarding the matter at the hybrid hearing if it chooses.

Regarding FRPO's second request, Enbridge Gas submits that it is inappropriate to require the Company to respond to new requests just days before the hybrid hearing and following an interrogatory process where the information could have been requested. Furthermore, it is unclear how the requested analysis regarding the Leamington Interconnect (which is not included within the proposed Project for which the Company is seeking leave to construct) would be relevant or valuable to the OEB and/or parties. FRPO can seek clarification regarding the matter at the hybrid hearing if it chooses.

If you have any questions, please contact the undersigned.

Sincerely,

Haris Ginis
Technical Manager, Leave to Construct Applications

c.c. Charles Keizer (Torys)
Tania Persad (Enbridge Gas Counsel)
Zora Crnojacki (OEB Staff)
Intervenors (EB-2022-0157)

¹ Exhibit B, Tab 2, Schedule 1, pp. 6-9; Exhibit I.FRPO.9; Exhibit I.FRPO.10; Exhibit I.FRPO.29.