

VIA RESS

November 14, 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 Undertaking – Preliminary Matter – Nov. 15th**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) with regard to a request which we believe could be handled as a preliminary matter at the outset of tomorrow’s hearing day.

FRPO made a request on November 4th for Enbridge to provide output results from simulations to assist with our examination which occurred during the oral hearing earlier today. EGI is the holder of the simulation, and we can only get outputs with their willingness or Board direction to provide. The Board determined that while it would not require Enbridge to provide the requested information in advance of the hearing, *FRPO can address and clarify these issues in the hearing through cross examination of Enbridge Gas’s witnesses with the option to ask for undertakings.*

In our compendium, we had provided the simulation outputs from both the 2022¹ and 2023² outputs for baseline case of 19km of NPS 36 hoping to achieve an understanding through comparison. However, at the outset of this morning’s hearing, EGI announced a significant change due to an error announcing that the shortfall moved from 67TJ to 150TJ. Without the outputs from that simulation, which EGI committed to update and file later, comparing the two simulation results would be pointless.

We did, however, want to test the sensitivity of the simulation model to additional east end supply so we pursued EGI extending their analysis found in Table 4 (in our compendium on page 78)³ to include other scenarios. Unfortunately, in getting side tracked by EGI’s reasons why they did not want to pursue my proposed scenarios and with time constraints that were dissipating, we did not get the requested undertaking for the simulation results that we believe would be informative.

¹ Exhibit I.FRPO.5, Attachment 1, Page 1

² Exhibit I.FRPO-18, Attachment 1, Page 1

³ Exhibit C, Tab 1, Schedule 1, page 18

As a result, respecting that others have inquiry that they still want to make in the remaining hearing time, we are advancing this request as a preliminary matter and respectfully ask that Enbridge provide by way of undertaking, the following to enhance our understanding and assist the Board:

- 1) For the Hybrid Alternatives in Table 4, please provide the simulation results in the same format as the base case of Exhibit I.FRPO-18. These simulations should already be completed to develop the incremental capacity shown in the table.
- 2) Extend Table 4 to add 37 TJ to the 21 TJ and shorten the length of NPS 36 to a comparable amount of incremental capacity and provide the simulation results in the same format as 1). In addition, update the facility cost related to the shortened length of NPS 36 extension.

We respectfully request that this data be provided by the company to allow for a fulsome consideration of the project, informed by data that can only be provided by the Enbridge simulation.

Respectfully Submitted on Behalf of FRPO,

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Principal
DR QUINN & ASSOCIATES LTD.

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