

VIA RESS

November 21, 2023

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

**RE: EB-2022–0157 EGI Panhandle Regional Expansion Project  
FRPO Reply to EGI Response on Request for Undertakings**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in reply to the EGI response<sup>1</sup> to our requested undertakings.

As noted in our November 14<sup>th</sup> letter, FRPO made a request on November 4<sup>th</sup> for Enbridge to provide output results from simulations to assist with our examination. Instead, the Board communicated, *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*<sup>2</sup>. As a result of the compressed time constraints, we advanced our request for two simulation results and an estimate of the cost impact of shortening the required looping in our letter.

EGI’s response states that it will provide a response to our first request which we believe will be helpful. However, EGI states its position that it not be required to answer our second request on the basis that they assert is not technically viable and that the costing is not a simple exercise. While we understand that the Board does not want our entire argument at this point, we believe we ought to be allowed to get the data to make that argument. To that end, we will briefly address EGI’s rationalizations which are misdirected.

**FRPO’s Proposed Approach is Technically Viable and Less Risky than more Pipe**

EGI asserts that the alternative posed by FRPO is not technically viable referencing the transcript and a yet to be filed undertaking. The technical conference reference points to EGI’s concerns about constraints on the amount of capacity on Panhandle Eastern and the C1 rights held by Rover which would be defined in the expected undertaking. We accept that Rover has renewal rights because of their original long-term C1 contract<sup>3</sup>. But FRPO is talking about obligating flows those flows by working with Energy Transfer as the pipeline operator<sup>4</sup>. As a result, EGI’s second reason about Risk Management does not apply and we hope to demonstrate, in our submission, that our proposition is less risky than adding assets that ultimately could be stranded.

<sup>1</sup> EGI\_Ltr\_FRPO\_Additional\_UndertakingRequest\_20231120

<sup>2</sup> OEB Ltr\_FRPO info request\_20231109\_signed

<sup>3</sup> EB-2016-0186 Union Gas\_transcript\_Vol 1\_20161122 page 12, lines 12-15

<sup>4</sup> Final Transcript EB-2022-0157 Enbridge LTC Vol 2, page, 80, line 17 to page 82, line 4

## **EGI Can Provide a Simple Estimate to Provide Sensitivity**

Estimates come with varying levels of precision. EGI has already provided an estimate for the reduction in length associated with 21 TJ of additional supply<sup>5</sup>. To provide the estimate requested, EGI could simply keep the same tie-in costs and proportionality reduce the cost of the pipeline between the tie-ins using the same unit cost in the second scenario. In our view, these estimates will likely be inside the range of error that may be realized in going from estimate to actual.

### Request and Timing

We understand that many parties, including EGI, have spent considerable time on the economics and who would bear the cost of the project and rightfully so. FRPO is striving to advance real solutions that are not inhibited by traditional utility bias toward infrastructure to reduce the cost and long-term risk of the project. Therefore, we would respectfully ask the Board to direct EGI to provide the undertakings as requested. However, if more time is needed beyond the November 22<sup>nd</sup> delivery of the undertakings accepted previously, we would be very accepting of receiving these undertakings by the November 30<sup>th</sup> date established for Argument-in-Chief.

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

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<sup>5</sup> Exhibit C, Tab 1, Schedule 1, page 18, Table 4