

BY EMAIL

November 22, 2023

Haris Ginis
Technical Manager, Leave to Construct Applications
Enbridge Gas Inc.
500 Consumers Road,
North York, ON M2J 1P8
haris.ginis@enbridge.com

Dear Mr. Ginis:

Re: Enbridge Gas Inc.

Panhandle Regional Expansion Project Federation of Rental-housing Providers of Ontario (FRPO) Request for Undertakings and OEB's Question to Enbridge Gas Ontario Energy Board File Number: EB-2022-0157

This letter addresses two issues arising from the recent hearing in this matter.

FRPO Request

On November 14, 2023, FRPO filed a letter asking that Enbridge Gas Inc. provide, as undertakings, simulation modeling related to hybrid alternatives filed in this proceeding. FRPO proposed that this request be dealt as a preliminary matter on the third day of the hybrid hearing on November 15, 2023.

More specifically, FRPO requested that responses to the following questions be provided by way of undertakings:

- 1. The simulation results for the two hybrid alternatives Enbridge Gas assessed as summarized in Table 4 at Exhibit C, Tab 1, Schedule 1, page 18:
 - 17.86 km of NPS 36 pipeline and 21 TJ/d supply Ojibway to Dawn exchange
 - ii) 16.20 km of NPS 36 and 21 TJ/d supply Ojibway to Dawn exchange

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2. Extend Table 4 at Exhibit C, Tab 1, Schedule 1, Page 18 to include additional hybrid alternative assuming 37 TJ/d of available Ojibway to Dawn exchange and to shorten the length of the NPS 36 based on this incremental capacity, and to update the facility costs accordingly.

FRPO asked that Enbridge Gas provide all requested simulation results in the same format as in Enbridge Gas's response to interrogatory I.FRPO.18.

At the hearing on November 15, 2023, the OEB reserved determination on FRPO's request until after the hearing and asked Enbridge Gas to file a written response to the request by FRPO.

On November 20, 2023, Enbridge Gas filed a letter confirming that it would provide a response to FRPO's first request and endeavour to do so with its other undertaking responses due November 22, 2023. With respect to the second request, Enbridge Gas submitted that it should not be required to respond to the second undertaking request as 37 TJ/d at Ojibway to Dawn exchange is not available and therefore this hybrid alternative is not technically feasible. Enbridge Gas added that determining the cost for the pipeline component of the hybrid alternative was not a simple exercise and that it does not have the necessary information.

On November 21, 2023, FRPO filed a letter in reply to Enbridge Gas's response. FRPO agreed that Rover has renewal rights in its original long-term contract and that it was not certain whether supply at Ojibway can increase to 37 TJ/d. However, FRPO stated that it "...is talking about obligating flows...by working with Energy Transfer as the pipeline operator." In FRPO's view, the hybrid alternative which includes a shorter NPS 36 pipeline and supply of 37 TJ/d may be "...less risky than adding assets that ultimately could be stranded." FRPO further explained that estimates come with different levels of precision and Enbridge Gas could simply keep the same tie-in costs and proportionally reduce the cost of the pipeline between the tie-ins using the same unit cost in the second scenario.

The OEB has reviewed FRPO's request dated November 14, 2023, Enbridge Gas's response dated November 20, 2023 and FRPO's response letter dated November 21, 2023. The OEB will require Enbridge Gas to file a response to FRPO's second request as this will allow FRPO the opportunity to address this issue in its submission. However, the OEB does not expect Enbridge Gas to undertake an elaborate exercise to arrive at the estimate cost. Rather, the OEB would be satisfied with a high level estimate based on an extrapolation of the 21 TJ/d example already in evidence.

The OEB directs Enbridge Gas to file its responses to both requests of FRPO by November 30, 2023.

OEB Request for Additional Information

A focus of the hearing was the issue of alternatives including the following statement by Enbridge Gas in the hearing:

Ms. Wade: I think it does because, again, specific to the project area, if we look at the general service day, for example, we would have to see a 50 percent decline in usage, and when I say decline actually coming right off the system to accommodate growth that's coming on from contract customers. So that's a significant amount of energy that would have to come off the system.¹

In reviewing the hearing transcript and evidentiary record, the OEB has not been able to identify the number of general service customers in the project area. As a result, the OEB directs Enbridge Gas to provide an estimate on the number of general service customers by class in the project area that would need to leave the system to free up sufficient existing system capacity to meet the forecast demand from contract customers. Enbridge Gas will also describe the timeframe over which this would need to occur to meet the forecast demand.

Enbridge Gas shall file its response to the above question no later than November 30, 2023.

Yours truly,

Nancy Marconi Registrar

c: EGIRegulatoryProceedings@enbridge.com All parties in EB-2022-0157

¹ Hearing Transcript, November 15, 2023, page 51 lines 25-28 and page 51, lines 1-3