



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

February 5, 2024

**EB-2023-0260 – Lawrence Avenue East Station Relocation Leave to Construct
Pollution Probe Interrogatories to Applicant**

Dear Ms. Marconi:

In accordance with Procedural Order No. 1 for the above-noted proceeding, please find attached Pollution Probe Interrogatories to the Applicant.

Respectfully submitted on behalf of Pollution Probe.

Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Consultant to Pollution Probe
Phone: 647-330-1217
Email: Michael.brophy@rogers.com

Cc: Eric VanRuymbeke, Enbridge Regulatory (via email)
Guri Pannu, Enbridge Legal (via email)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

**Enbridge Gas Inc.
Lawrence Avenue East Station Relocation
Leave to Construct**

POLLUTION PROBE INTERROGATORIES

February 5, 2024

**Submitted by: Michael Brophy
Michael Brophy Consulting Inc.
Michael.brophy@rogers.com
Phone: 647-330-1217
28 Macnaughton Road
Toronto, Ontario M4G 3H4**

Consultant for Pollution Probe

1-PP-1

References:

“Metrolinx has requested that Enbridge Gas temporarily relocate certain existing natural gas pipeline assets” [B/1/1 Page 1]

“Upon completion of the Subway Extension in 2030, Metrolinx has requested that Enbridge Gas permanently relocate those natural gas pipeline assets back onto the municipal right-of-way. The details and scoping of work for the permanent relocation are unknown at this time because they are dependent on Metrolinx finalizing construction activities and schedule for the Subway Extension” [B/1/1 Page 1]

“The proposed relocation Project is required to eliminate conflicts with Metrolinx’s Subway Extension construction while maintaining the ability to serve existing Enbridge Gas customers” [B/1/1 Page 3]

- a) Please confirm that the project facilities in this project are only temporary and will be replaced by permanent facilities in the near future and please indicate the following:
 - The date the temporary facilities will be installed
 - The date the temporary facilities will be abandoned
 - The date the permanent facilities will be installed
- b) Please explain how Enbridge is able to propose a design for the temporary facilities (i.e. the subject of this application) when the final layout and design of the Metrolinx facilities causing the relocation are not currently known.
- c) Please explain what Enbridge will need to do if the actual temporary facility design is impacted by the final Metrolinx layout and design (i.e. requires changes from what was filed).

1-PP-2

Enbridge indicates the following elements to the proposed project. [C/1/1 Page 1]

- 79 m of Nominal Pipe Size (NPS) 4 inch Polyethylene (PE) Intermediate Pressure (IP) temporary gas main relocation along permanent easements on Metrolinx owned private properties.
- 266 m of NPS 6 inch Steel Coated (SC) High Pressure (HP) temporary gas main relocation along permanent easements on Metrolinx owned private properties, along McCowan Road, and along Valparaiso Avenue.

a) For each of the pipeline sections proposed, please provide the following information.

- How many customers are served by the proposed pipe section.
- How many customers would not have natural gas available if the section was not built.
- How many new customers will be served due to the new section of pipe (directly or fed via the section)

1-PP-3

Reference: “The details and scoping of work for the permanent relocation are unknown at this time because they are dependent on Metrolinx finalizing construction activities and schedule for the Subway Extension” [B/1/1 Page 1]

a) Please provide any updates or changes Enbridge has received toward finalization of the design and schedule Subway Extension project.

b) Please indicate what the proposed completion date is of the Scarborough Subway Extension project and the whether routing alignment changes could occur prior to completion.

1-PP-4

References:

“This pipe is one of two mains that feed the customers indicated. Without a replacement of this section, the high pressure system will see a reduction in pressure as well as an increase to the Operational Risk of loss of supply to the customers in Figure 2 that will become supported via a single feed.” [B/1/1 Pg 3]

“If gas assets in conflict are abandoned but not relocated, the duality of natural gas flow in both directions (east/west and north/south) for customers off of the NPS 12 and NPS 8 system will be removed, resulting in a single feed to customers.” [B/1/1 Pg 5]

- a) Please confirm that the customers highlighted in Figure 2 (i.e. 4750 customers in teal) are served by two different gas mains and that cutting off the NPS12/8 main sections identified in Exhibit A, Tab 2, Schedule 1, Attachment 1 would still enable gas to flow from the other supply main. If incorrect, please explain.
- b) Did Enbridge consider skipping the installation of the temporary facilities outlined in this application and serving that part of the system via a single feed until a more permanent solution could be considered? If no, please explain why not. If yes, please provide a copy of all materials related to that analysis and decision not to adopt that option.
- c) Please confirm what approximate percentage of the Enbridge distribution mains are single fed pipelines vs. multiple fed pipelines in its system.
- d) Please provide a copy of the relevant Enbridge (and OEB if applicable) policy documents that indicate when dual feeds are required instead of single fed systems. Please explain how these policy documents were applied to the decision to go with a dual feed solution for this project.
- e) Please provide all risk analysis and modeling results that compare the risk mitigated by a single vs. dual fed system and how those mitigated risks are compared to project costs.

2-PP-5

Reference: “Customer-Specific Builds: Where the customer fully pays for the incremental infrastructure costs associated with a facility project, in the form of a Contribution in Aid of Construction, the OEB finds that consideration of an IRP Plan will not be required.” [EB-2021-0091 dec_order_EGI_IRP_20210722, Page 48]

Please confirm which specific exemption(s) from the IRP Framework Enbridge is requesting and the rational for how the exemption applies to this project.

2-PP-6

Reference:

PollutionProbe_IR_AppendixA_InfrastructureOntarioAnnouncement_20240205

- a) Please confirm when Enbridge was first become aware that the proposed Scarborough Subway project was planned to proceed.
- b) Per Appendix A noted above, public announcement of the Subway and general routing was released by Infrastructure Ontario in 2019. Did Enbridge assess potential impacts and general alternative options once the project information was announced? If yes, please provide the materials providing the assessment of those options. If no, please explain why not.
- c) As Enbridge mentions, this is not the first project brought forward to the OEB to respond to potential alignment conflicts with the Scarborough Subway. Based on the general routing proposed for the Scarborough Subway, please provide a list of the pipelines relocation projects that Enbridge believes will be require and for each one indicated the estimate date required and estimated cost.

3-PP-7

Are all components of the proposed pipeline and related proposed station designed to distribute hydrogen or just natural gas? If designed to distribute hydrogen in the future, please indicate what modifications were required to enable the infrastructure to be compatible with hydrogen.

3-PP-8

- a) Please provide a copy of the agreement with Metrolinx confirming that they will reimburse Enbridge for the project costs.
- b) Please confirm that the agreement for Metrolinx project reimbursement noted above is not a customer agreement (i.e. Metrolinx is not defined as a natural gas customer for purposes of the agreement)
- c) Please indicate if any of the proposed costs in Table 1 of Exhibit E, Tab 1, Schedule 1 require different treatment as a result of the recent EB-2022-0200 OEB Decision. If yes, please provide an updated table reflecting those changes.

3-PP-9

Please replicate Table 2 from Exhibit E, Tab 1, Schedule 1 including a column with the information from the proposed project and indicating (in brackets beside each value in the table if that is easiest) the amount in each cell as a percents of the total project costs (for each project).

3-PP-10

- a) Enbridge indicates that the project capital costs would be reimbursed by Metrolinx through a Contribution in Aid of Construction. Please confirm this means that the project costs will not go into capitalized rate base or included in rate collected from rate payers. If that is not correct, please explain what amounts related to this project rate payers would pay.
- b) The project is a temporary pipeline that Enbridge indicates would need a long-term replacement in the 2030 timeframe. Please confirm the amortization period Enbridge proposes to use for the project assets installed.

4-PP-11

Please confirm that the proposed schedule is still accurate or provide an updated project schedule including major milestones including permits and approvals.

4-PP-12

Reference: “On March 28, 2023, the Ontario Energy Board released updated guidelines, titled Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th Edition. As the project was initiated prior to March 28, 2023, the 7th Edition Guidelines were followed; however, components of the 8th Edition Guidelines were considered when drafting this report” [F/1/1 Page 1]

Please provide a list of the additional elements Enbridge incorporated from the most recent (2023) Environmental Guidelines and indicate what the impacts were for each item.