

VIA RESS & E-MAIL

April 10, 2024

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

RE: EB-2022-0111– City of Kawartha Lakes incl. Bobcaygeon -FRPO Clarification

We are writing on behalf of the Federation of Rental-housing Providers of Ontario to correct any confusion initiated by our error in our submissions and exacerbated by the EGI Reply submission.¹ Our goal is to clarify the record for the Board's understanding.

In the Application, EGI proposed an NPS 6 Supply pipeline and an NPS 6 Reinforcement pipeline.² In our contribution to the Board's determinations, we submitted: *We urge the Board not to approve the LTC for the NPS 8 Reinforcement pipeline.*³ The Reinforcement pipeline proposed was clearly NPS 6 not NPS 8 and that was our error, for which, we apologize for our misstatement.

Our primary concern is that EGI leveraged that error in a way that could perpetuate confusion without responding to our fundamental concern about the necessity of the Reinforcement pipeline. EGI asserts: *It is unclear based on FRPO's submission if the calculations were performed with the larger pipe diameter, for which Enbridge Gas is not seeking leave to construct.*⁴

FRPO strived to test the pipeline sizing proposed by EGI with publicly available resources.⁵ The resulting pressure drop calculations demonstrated that the NPS 6 Supply line was sufficient for the 10-year forecast of customer attachments. Therefore, we submitted: *To test the need for reinforcement, we analyzed the pressure drops in the pipeline segments between the specific points (A, B and C) using **only an NPS 6 HP pipeline** (emphasis added).*⁶ In retrospect, to be crystal clear, we should have said the NPS 6 Supply pipeline.

In any event, to an informed reader, it should be clear that our analysis was calculated for only ONE NPS 6 pipeline placing all of the flow at the end of each segment of the two segments of the pipeline. As a result, the assumed size of the proposed Reinforcement pipeline is irrelevant as there was no Reinforcement pipeline included in our analysis.

¹ EGI_ReplySUB_EB-2022-0111_20240408_eSigned, para. 37

² EGI_APPL_Bobcaygeon_LTC_Updated_20230614 Exhibit A, Tab 2, Schedule 1, page 1

³ FRPO_SUB_EGI NGEP BOBCAYGEON_20240325, page 3.

⁴ EGI_ReplySUB_EB-2022-0111_20240408_eSigned, para. 37

⁵ FRPO_SUB_EGI NGEP BOBCAYGEON_20240325, page 2

⁶ FRPO_SUB_EGI NGEP BOBCAYGEON_20240325, page 3

If there was any legitimate doubt about what analysis was presented, one need only look at the printout of the analyses captured in Attachment 1 and 2 of our submissions. The summary the analysis shows the internal diameter of the pipe being analyzed as 6.065 in (the internal diameter of NPS 6 piping). There can only be on pipe being evaluated with the results captured in the printouts in our Attachments.⁷

The asserted confusion by EGI has no basis. However, this “lack of clarity” resulted in EGI not responding to our presented calculations that showed that a Reinforcement pipeline was not needed. As a result, these calculations are uncontested.

We trust that this submission will enhance the clarity of the record for the Board’s determinations.

Respectfully Submitted on Behalf of FRPO,

Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. EGIRegulatoryProceedings – EGI

⁷ FRPO_SUB_EGI NGEP BOBCAYGEON_20240325, Attachments 1 and 2