Shepherd Rubenstein

BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
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September 9, 2024
Our File: EB20240200

Attn: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: EB-2024-0200 – Enbridge St. Laurent Replacement Project – SEC Interrogatories

We are counsel to the School Energy Coalition ("SEC"). Attached, please find SEC's interrogatories.

Yours very truly,
Shepherd Rubenstein P.C.

Mark Rubenstein

cc: Brian McKay, SEC (by email)
Applicant and intervenors (by email)

EB-2024-0200

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act,1998*, S.O. 1998, c.15, Schedule B, and in particular, sections 90 (1) and 97 thereof;

IN THE MATTER OF an application by Enbridge Gas Inc. for an order granting leave to construct natural gas pipelines in the City of Ottawa.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

1-SEC-1
[A-2-1] Please detail all differences in the project compared to that proposed in EB-2020-0243.

1-SEC-2
[A] Please provide a copy of all material provided to Enbridge's senior management and Board of Directors related to the proposed project, or the EB-2020-0243 version of the project, since the issuance of the OEB's decision in EB-2020-0243.

1-SEC-3
[B-1-1, p.16] Please provide a copy of the report or final work product of the NDE vendor.

1-SEC-4
[B-1-1] Please provide a copy of:

a. [p.18] CSA Z662
b. [p.36] CSA Z662, Annex O
c. [p.18] Excerpts of the company's 'operating standards' (including any introduction or overview sections that would assist in understanding the standards) relevent to issues regarding the St. Laurent North pipeline.
d. [p.36] PHMSA Distribution Pipeline Significant Incident Benchmark
e. [p.37] Complete internal copy of the Enbridge Standard Operational Risk Assessment Matrix, including any internal guides or reference documents.
f. [Attach 2, p.68] St. Laurent Integrity Actions Report

1-SEC-5
[B-1-1, Appendix B] Please provide a copy of any internal guides or reference documents regarding the undertaking of a QRA.

1-SEC-6
[B-1-1, Appendix B, p.4] Please explain how the proposed project is going to improve reliability related to third-party damage.

1-SEC-7
[B-1-1, Attachment 2, p.2] The QRA received final approval in May of 2023, please explain why it took the company over a year to file this Application.

1-SEC-8
[B-1-1, Attachment 3] With respect to the DNV, St. Laurent Pipeline Risk Review Memo:

a. Please provide a copy of all instructions provided to the DNV.
b. Does the memo represent the entirety of DNV's work regarding the St. Laurent project? If not, please provide a copy of its full work product.
c. Please provide a list of all information and documents provided to the DNV as part of its review, and provide a copy of all material information and documents that have not been filed on the record.

2-SEC-9
[B-3-1, Attachment 1, p.26] Please provide the following information:

a. The proportion of current customers by year, for each of the P10, P50, and P90 for each case. Please provide the information in Excel format.
b. For each case, and for each of the P10, P50, and P90 through the forecast period, please calculate the total reduction in each of the peak day and peak hour demand of loads served by the proposed project. Please detail all assumptions made and provide the information in Excel format.

2-SEC-10
[C-1-1, p.16-18] Please provide a detailed breakdown of the 'Extensive Inspection and Repair' cost forecast used for the purposes of the alternative analysis. Please detail all assumptions made.

2-SEC-11
[C-1-1, p.19] With respect to the NPV Calculcation included in Table 7:

a. Please provide the underlying NPV calculations for the information included in Table 7. Please detail all assumptions made and provide the calculations in Excel format with all formulas intact.
b. Please confirm that Enbridge did not include, as part of the NPV calculation, any adjustment to account for the probability of asset stranding as calculated as part of the Integral Engineering, Probabilistic Asset Life Analysis (B-3-1, Attach 1). If confirmed, why not?

2-SEC-12
[C-1-1, p.24] Enbridge notes that based on the Posterity Report, to downsize the pipe, a peak hour demand reduction of 13,300 m3/hr to 25,100 m3/hr is required by winter 2025/2026, which it says it has insufficient technical potential. Assuming that could be achieved, what would the pipe be downsized to, and what would the reduction in costs be?

2-SEC-13
[C-1-1, p.25] Enbridge states that based on the "there is a very low probability of a rapid conversion off gas to electric options and/or a meaningful increase in gas disconnections in the near to medium term (five to fifteen years) in the Project area." On that basis, it concludes that this "supports a low risk of the proposed Project assets being stranded." Please provide what analysis Enbridge has undertaken to assess the risk of future underutilization as opposed to stranding of the proposed pipeline.

3-SEC-14
[E-1-1, p.2] With respect to project costs:

a. Please provide a revised version of Table 1 that compares the project costs by category compared to that proposed as part of EB-2020-0243. Please explain all material differences in costs.
b. Please provide the basis for the project cost estimate.
c. Has Enbridge undertaken an RFP for the project? If so, please provide details.
d. What is the expected contract structure with the external contractor?

3-SEC-15
[EB-2022-0200, Exhibit 2-6-2, Appendix A, p.60] Please reconcile the project scope and costs as compared to the information contained in the EB-2022-0200 Capital Update.

Respectfully, submitted on behalf of the School Energy Coalition this September 9, 2024

Mark Rubenstein
Counsel for the School Energy Coalition