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September 9, 2024

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

Dear Ms. Marconi,

**RE: EB-2024-0200 Enbridge Gas Application for leave to construct natural gas pipelines  
in the City of Ottawa - Energy Probe Interrogatories to the Applicant**

Attached are the interrogatories of Energy Probe interrogatories to the Applicant in EB-2024-0200 Enbridge Gas Application for leave to construct natural gas pipelines in the City of Ottawa proceeding.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe)  
Zora Crnojacki (OEB Staff)  
James Sidlofsky (OEB Staff)  
EGI Regulatory Proceedings  
Intervenors of Record

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**Enbridge Gas Application for Leave to Construct Natural Gas Pipelines in the City of  
Ottawa**

**Energy Probe Interrogatories to the Applicant**

**1.EP-1**

**Reference:** Exhibit B, Tab 3, Schedule 1, Page 5, Table 1 Status of Energy Evolution Priority Projects

**Questions:**

- a) How many City of Ottawa municipal buildings were converted from natural gas to electric space and water heating since 2020?
- b) Please confirm that Ottawa City Hall at 110 Laurier Avenue West is heated by natural gas.
- c) Has the City of Ottawa requested that Enbridge stop providing natural gas to any of its buildings.

**1.EP-2**

**Reference:** Exhibit B, Tab 3, Schedule 1, Page 7, Paragraph 18

**Questions:**

- a) Please confirm the Cliff Street Heating and Cooling Plant that provides heat to Federal Government buildings on Parliament Hill uses natural gas fired boilers.
- b) Has Public Works requested that Enbridge stop providing natural gas to the Cliff Street Heating and Cooling Plant?

**1.EP-3**

**Reference:** Exhibit B, Tab 3, Schedule 1, Page 11, Paragraph 21

**Preamble:** “In February 2024, Enbridge Gas engaged Integral Engineering (Integral) to perform probabilistic modeling using a set of input assumptions supplied by Enbridge Gas.”

**Questions:**

- a) Please provide the list of input assumptions supplied by Enbridge Gas to Integral.
- b) Please confirm that the rate of conversions from gas to electric space heating is sensitive to the relative cost of energy available to customers including its delivery costs.

**1.EP-4**

**Reference:** Exhibit B, Tab 3, Schedule 1, Page 13, Paragraph 37

**Preamble:** “The Large Volume Contract Demand (LVCD) customers served by the SLP system generally fall into the institutional sector and include hospitals, medical research facilities, post-secondary institutions, and government. The gas supplied to these customers is critical for meeting their energy needs and the safe and reliable operation of their facilities. The operation of these facilities serves the public interest and is essential for the City.”

**Questions:**

- a) How many large volume customers in Ottawa currently have the following gas fired equipment: emergency power generators, load displacement generators, and combined heat and power generators?
- b) How many large volume customers use their gas powered generators to export power into the Hydro Ottawa grid?

**2.EP-5**

**Reference:** Exhibit B, Tab 3, Schedule 1, Page 22, Paragraph 53

**Preamble:** “General service customers leaving the gas system in Ottawa would need to have their energy needs accommodated by other forms of energy, primarily assumed to be electricity.”

**Questions:**

- a) How many general service customers left the gas system in Ottawa by converting to electricity since 2020?
- b) How many Ottawa Carleton District School Board schools have left the gas system in Ottawa by converting to electricity since 2020?

- c) Is the Ottawa Carleton District School Board office building at 133 Greenbank Road, Ottawa, heated with natural gas? If the answer is yes, has the Ottawa Carleton District School Board requested that Enbridge stop providing natural gas to the building?
- d) Is the building housing the offices of CAFES Ottawa at 166 Glebe Avenue heated by natural gas? If the answer is yes, has CAFES Ottawa requested that Enbridge stop providing natural gas to the building?

## **2.EP-6**

**Reference:** Exhibit B, Tab 3, Schedule 1, Page 22, Paragraph 54

**Preamble:** “The current seasonal peak electricity demands in Ottawa are similar and differ by less than 10%, indicating that Ottawa is already very close to being a dual peaking region, with little “room” to accommodate incremental winter peak demand, without triggering the need for additional infrastructure beyond the \$650 million that is currently planned.”

### **Questions:**

- a) EV charging can have a significant impact on peak load where a home with Level 2 charger has a peak load of about three average homes without an EV charger. Does the current seasonal peak electricity demand in Ottawa take into account the impact of EV charging with Level 2 home chargers?
- b) Please confirm that when considering peak load capacity on an electricity distribution system one must not only consider the aggregate load, but also the load on each feeder and on each distribution transformer.

## **2.EP-7**

**Reference:** Exhibit B, Tab 3, Schedule 1, Page 24, Paragraph 56c

**Preamble:** “\$375 billion to \$425 billion in new transmission and supply infrastructure investment would be required, resulting in an annual total system cost of approximately \$60 billion by 2050.”

### **Questions:**

- a) Please confirm that electricity distribution and transmission rates would have to increase to pay for the new transmission and supply infrastructure.
- b) Is the \$60 billion annual system cost the approximate amount that would have to be recovered from electricity ratepayers?

#### **4.EP-8**

**Reference:** Exhibit D, Tab 1, Schedule 1, Pages 17 and 18, paragraph 31 and Exhibit G1, Tab 1, Schedule 1, Page 2

#### **Preamble:**

“31. All necessary permits, approvals and authorizations will be obtained by Enbridge Gas at the earliest appropriate opportunity. Enbridge Gas expects to receive all required approvals prior to commencing construction on each segment of the Project.”

#### **Questions:**

- a) Please confirm that Enbridge Gas has a Municipal Franchise Agreement (MFA) and a Certificate of Public Convenience and Necessity (CPCN) with the City of Ottawa?
- b) What permits and authorizations does Enbridge Gas need from the City of Ottawa considering that it has the MFA and the CPCN?
- c) Has Enbridge Gas applied to the City of Ottawa for the required permits? If the answer is yes, has the City issued any of the permits?