

**EB-2023-0343**  
**East Gwillimbury Gas Expansion Project**

**Interrogatories of Environmental Defence on the Evidence Update**

Note: Many of the questions below are relevant to multiple issues, not only the issue indicated.

**Interrogatory # 3.0-ED-48**

Reference: Exhibit E, Tab 1, Schedule 1

Questions:

- (a) Please provide a table listing all the projects in Schedule 1 and 2 of O. Reg. 24/19 with columns for: (i) status, including planned in-service date for projects not yet build, (ii) total capital costs (if known), (iii) total NGEP subsidy, (iv) total revenue needed to achieve a profitability index of 1, and (v) capital cost overruns (\$, if applicable).
- (b) For all the projects that are currently not proceeding (or are indefinitely on hold), please explain why they are not proceeding and whether or not that factor would apply in whole or in part to East Gwillimbury.
- (c) For all the projects with cost overruns, please explain why the cost overruns occurred and whether or not those circumstances could arise in this case.

**Interrogatory # 3.0-ED-49**

Reference: Covering letter, p. 3.

Question:

- (a) Please provide a list of the past 10 gas expansion projects for which leave to construct was required and indicate the contingency percentage used in the leave to construct application. To the extent that they differ from the updated value of 10% in this project, please explain why.

**Interrogatory # 3.0-ED-50**

Reference: Exhibit E, Tab 1; Exhibit B, Tab 1, Schedule 1, Page 7

Question:

- (a) Please provide a description of how Enbridge adjusted its customer connection forecast to account for the revised ELC and file a copy of all calculations and tables.
- (b) What is the average ELC that Enbridge expects connecting customers to pay.
- (c) What is the highest ELC that Enbridge expects a connecting customer to pay.

### **Interrogatory # 3.0-ED-51**

Reference: Exhibit E, Tab 1, Schedule 1; Exhibit B, Tab 1, Schedule 1, Page 7

Question:

- (a) For the recently-approved gas expansion projects (Selwyn, Mohawks of the Bay of Quinte, Hidden Valley, Bobcaygeon, Eganville, & Neustadt) please provide a table showing, for each year from 2023 to 2027: (i) the forecast number of connections per LTC application, (ii) the number of customers who have applied for gas service, (iii) the number of completed connections, and (iv) the latest updated forecast for connections in 2024.
- (b) If there is any divergence between the forecast and actual connections, please explain the reason for this and whether or not it is likely to apply in East Gwillimbury, and why.
- (c) For the communities in (a), please provide the number of customers who have applied for gas service (on average per month) before and after the increase in the extra length charge.
- (d) Please provide all of the forms/contracts used by potential customers applying for a gas connection.
- (e) If a potential customer applies for gas service but changes their mind before construction begins for their service line, are they liable to be charged a penalty under documents they have signed and is Enbridge's practice to actually charge them a penalty?
- (f) How many customers have formally signed up and applied to receive gas service in the project area?

### **Interrogatory # 3.0-ED-52**

Reference: Exhibit E, Tab 1

Question:

- (a) Please provide the details of the IESO heat pump subsidy program.
- (b) Does the IESO's heat pump subsidy program apply in the project area (and if yes, what percent of the area).
- (c) Please provide the latest data on: (i) the number of customers with electric resistance heating in the project area (i.e. along the proposed new pipes), (ii) the percent of customers in the project area with electric resistance heating, (iii) the percent of customers who responded to the customer connection survey indicating that they are likely to connect to the gas system that have electric resistance heating, and (iv) how many customers with electric resistance heating that Enbridge anticipates connecting.
- (d) Please provide the latest data on: (i) the number of customers with electric heat pump heating in the project area (i.e. along the proposed new pipes), (ii) the percent of customers in the project area with electric heat pump heating, (iii) the percent of customers who responded to the customer connection survey indicating that they are

likely to connect to the gas system that have electric heat pump heating, and (iv) how many customers with electric heat pump heating that Enbridge anticipates connecting.

**Interrogatory # 3.0-ED-53**

Reference: Exhibit E, Tab 1

Question:

- (a) Please provide a detailed description of how Enbridge calculates normalized reinforcement costs for projects where such costs are accounted for. Please include any internal guides or documents describing the calculations.
- (b) Please provide a list of all reinforcement projects that have occurred upstream of the project area over the past decade, including the location, the size of the capacity increase, and the cost.
- (c) Please provide a list of all reinforcement projects that are included in Enbridge's AMP upstream of the project area over the past decade, including the location, the size of the capacity increase, and the cost.
- (d) Please provide a table showing the peak hour and peak day demand each gas expansion project area under the NGEP program and the total for all, each year from 2020 to 2030.

**Interrogatory # 3.0-ED-54**

Reference: Exhibit E, Tab 1

Question:

- (a) Does Enbridge have a copy of the Cost Effective Energy Pathways Study for Ontario, a draft of the report, or a presentation summarizing the conclusions? If yes, please provide a copy and comment on how the report conclusions may or may not be relevant to the risk of customers in the project area leaving the gas system before the end of the 40-year revenue horizon.
- (b) Does Enbridge have a copy of a draft or a summary of a draft of Ontario's forthcoming Natural Gas Policy Statement? If yes, please provide a copy and comment on how the policy may or may not be relevant to the risk of customers in the project area leaving the gas system before the end of the 40-year revenue horizon.