

**REF:** Exhibit A, Tab 2, Schedule 1, Attachment 1  
Exhibit B, Tab 1, Schedule 1, Pages 1-2 and 7, Table 2  
Exhibit E, Tab 1, Schedule 1 including Table 1  
AND EB-2022-0081 Natural Gas Facilities Handbook, p. 32-33

## ISSUE 2 PROJECT ALTERNATIVES

Preamble: We would like to understand the assessment of the project need and alternatives considered in this application. The referenced pages of the Natural Gas Facilities Handbook provide the Board's expectation for information to be filed in respect of Project Need and Alternatives. The content of the application does not provide the reader with the necessary understanding to determine the appropriateness of the sizing proposed in this application. In the above references, the number of customers, their forecasted load and location are not provided in conjunction with the existing and proposed assets to provide sufficient system pressure to feed the forecasted customers. Without this information, no one, including the Board can determine if the proposed facilities are appropriate.

In addition to the questions asked in 2024-03-18 interrogatories

- 8) Please provide in Excel format, for each of the ten years, for each segment, the annual and peak hourly demand forecasted for that segment for the original application and the updated application.

## ISSUE 3 PROJECT COST AND ECONOMICS

Preamble: From Table 1, we calculate that the estimate for Outside Services accounts for approximately 28% of the pre-contingency total estimate for the project. However, we cannot find any additional information as to the nature of these outside services, their necessity and how EGI would exert cost control over these services. We would like to understand this category.

In round numbers, the forecasted customers are down at little less than 30% and the project costs are down a little more than 10% while the contribution needed from NGEF is down about 27%.

- 9) Please explain how the changes in the updated application have resulted in a much lower NGEF contribution.