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Enbridge Gas Inc.
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December 13, 2024

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Dear Nancy Marconi,

**Re: Enbridge Gas Inc. ("Enbridge Gas" or the "Company")
Ontario Energy Board ("OEB") File No. EB-2024-0200
St. Laurent Pipeline Replacement Project**

We are writing in response to FRPO's letter from yesterday evening.

Contrary to FRPO's assertion, there are not "continued omissions" in respect of Enbridge Gas's undertaking responses. Enbridge Gas has fully responded to the undertakings. This has included providing additional explanations and information on December 6 by way of updated answers to six undertaking requests, in response to FRPO's November 29 letter. While full responses have already been provided, to ensure clarity in respect of a technical point raised in FRPO's letter last night, we are attaching a brief additional explanation to the response to JTX1.28.

FRPO's latest letter mainly consists of submissions on the merits regarding the pipe sizing for one section of the project. Respectfully, the appropriate time for these submissions is closing argument, at which point FRPO can make these and any other submissions it may have on the merits. Enbridge Gas disagrees with FRPO's position and submissions in its letter, and will address them as part of Enbridge Gas's responding closing argument.

As referred to in our December 6 letter, we also note that this pipe size issue being raised by FRPO is in respect of only a small section of the pipeline and is financially immaterial in the context of the overall size of this project – it is only approximately a \$1.3 million issue in the context of a \$216 million proposed project – and is not probative to a determination of whether this project is in the public interest. This small and discrete issue and technical point being raised by FRPO, which is already addressed in detail by the evidence filed on the record and the undertaking responses, would not warrant or require an oral hearing as FRPO suggests.

In light of the proposed construction timing for this project and associated evidence of need and urgency, and given the time that has now been taken to complete the technical conference and undertakings process (in light of prior requests from intervenors), Enbridge Gas respectfully asks

that the remaining steps in the application be completed in as timely a way as reasonably practical.

Sincerely,

Patricia Squires

Patricia Squires
Manager, Regulatory Applications – Leave to Construct

Cc: Zora Crnojacki (OEB Staff)
Charles Keizer (Torys)
Arlen Sternberg (Torys)
Intervenors (EB-2024-0200)

ENBRIDGE GAS INC.

Answer to Undertaking from
Federation of Rental-housing Providers of Ontario (FRPO)

Undertaking:

Tr: 157

To look at the ability to reduce the pressures at three selected stations and increase the pressure at other stations to offload them, to reduce the pressure and amount of gas that would need to flow through the St. Laurent pipeline.

Response:

Please refer to the response to Exhibit JTX1.26.

Further Request in FRPO's November 29, 2024 Letter:

Please provide the response to this undertaking as stipulated in the transcript (i.e., increasing station pressures above 380 kPa but not above 420 kPa).

Please provide EGI's view on the rationale of why 380 kPa is the preferred maximum set pressure for the Ottawa system given the requirements of CSA Z662.

Response:

An increase in operating pressure above 380 kPa but below 420 kPa in the Ottawa IP systems is not possible, however it also would not be sufficient in order to meet the required demand reduction on the St. Laurent Pipeline to affect a reduction in pipe size. To complete the analysis in JTX1.26 it was first confirmed that the outlet pressures of the stations off the St. Laurent Pipeline were at 380 kPa. Next, the other stations not fed from the St. Laurent Pipeline that were also providing benefit to the downstream IP networks were also confirmed to be set at the same 380 kPa. Following this confirmation, analysis began to bias flow off of the St. Laurent Pipeline by adjusting station set pressures down for those fed from the St. Laurent Pipeline until the system minimum pressure was reached; those results are shown in JTX1.26. The resultant change in demand on the St. Laurent Pipeline with these adjustments is approximately 1,500 m³/hr whereas the reduction that would be required to reduce the NPS 16 to NPS 12 near St. Laurent Control is 25,100 m³/hr¹, or only 5.8% of the required shift in demand.

¹ Exhibit C, Tab 1, Schedule 1, p. 22, para. 43.

Additional clarification on response (December 13, 2024):

By way of further explanation, increasing the maximum set pressure to above 380 kPa as suggested by FRPO is not possible as a practical matter for a number of reasons, including: regulator operating requirements; overpressure protection; and historical system operations. In any event, even if it were theoretically possible, a pressure increase to as high as 420 kPa would still be insufficient to warrant a downsizing of pipe from NPS 16 to NPS 12 as it would only achieve less than 40% of the required flow reduction on the St. Laurent system for a downsize to NPS 12. Accordingly, downsizing is not feasible.

For context, we also note that downsizing to NPS 12 would only result in a cost reduction of approximately \$1.3 million of a \$216 million proposed project.