

## Introduction

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) regarding the Enbridge Gas Inc. (EGI) application to serve customers through a set of pipelines in East Gwillimbury. We understand from similar applications, given the nature of these applications, there are limited issues that the Board has not previously addressed. However, as in similar applications, we believe that we can assist the Board with the appropriateness of pipe sizing.

As with more recent applications, though, we are challenged in our capability primarily due to the lack of specificity - system pressures, flows, pipe sizes and locations of the existing feeding system and the proposed piping including the location of the load served – in the pre-filed application which, in turn, makes it difficult to ask more precise questions in the limited discovery period. As a result, FRPO will provide narrow submissions herein.

We understand that other parties have concerns on other issues with respect to this project but will leave it to the respective parties to address those issues and FRPO takes no position on those matters.

## Project Piping Submissions

We understand and respect that this set of projects were applied for and accepted as part of the Ontario Government's Phase 2 NGEP, as specified in the Expansion of Natural Gas Distribution System Regulation.<sup>1</sup> Despite our concerns about the economic profitability given the costs and the number of customers, we acknowledge that the projects will proceed with incremental costs borne by the community, the customers served, taxpayers, and potentially natural gas ratepayers in 10 years. However, we set out to assist the Board with the facility sizing.

FRPO would like to highlight our concerns that these pipe sections and other facilities projects have been submitted to the Board with very little information on the proposed layout of the piping network, including pressures and other critical information required to assess the "right-sizing" of the project to the demands identified. The facilities information provided in the pre-filed evidence on these projects falls far short of those prescribed in the Natural Gas Facilities Handbook. Although our initial inquiry yielded some enhanced understanding of the sizes and operating pressures of the proposed networks, the effort required to assist the Board is more onerous than necessary given the lack of sizing, pressure, layout (location of size and load) in the application. FRPO has provided the Board with similar concerns in recent facilities applications.

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<sup>1</sup> Ontario Regulation 24/19 Expansion of Natural Gas Distribution Systems, Schedule 2

Comprehensive Facilities & Network Analysis in Pre-filed Evidence Aids Efficiency

As noted in a number of recent proceedings, the description of the proposed facilities (pipe sizing, location, etc.) and the forecasted quantum and location of load and resulting operating pressures under design conditions ought to be filed in the pre-filed evidence.<sup>2</sup>

Instead, when the application provides a description of the pipe layouts (in this application in nine separate sections)<sup>3</sup> and a map shows pipe routing without labelling of sections,<sup>4</sup> one must start piecing the puzzle together. However, with some of the picture created, there is a realization that the source of gas (feeder pipes) is not apparent.<sup>5</sup> From there, one needs to understand how the segments are fed (station location) and the location of the specific sizes of pipes.<sup>6</sup> With the basic pipe layout and feeding stations (supply) now understood, one needs to construct the customer load amongst the sections (demand).<sup>7</sup> With what we thought would be all of the pieces of the puzzle to allow evaluation of the pipe sizing, we recognized that we did not have all of the pieces as the distribution of particularly larger loads along the pipe was not requested and as a result not provided. We walk through this exercise to provide an understanding of the challenge faced in testing the proposal when, to extend the analogy, the applicant can simply provide the whole picture (on the top of the box) at the outset with simple mapping with pipe sizes indicated and their network analysis that supports the sizing.<sup>8</sup>

In any event, after extracting the necessary information, an evaluation of sizing can be done. Using a conservative assumption (all of the section demand at the end of the pipe section), FRPO can now state that we do not have issue with the pipe sizing proposed.<sup>9</sup> However, it would aid Regulatory Efficiency if the application included this information from the outset since the applicant must perform the above steps to size the pipe in the first place. Including this essential information in the application overcomes information asymmetry in a much more effective fashion. We say effective as it also reduces the risk that third party analyses performed with simplifying assumptions do not result in a different conclusion on the appropriateness of pipe sizing.<sup>10</sup>

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<sup>2</sup> EB-2022-0081 Natural Gas Facilities Handbook, issued March 31, 2022

<sup>3</sup> Exhibit B, Tab 1. Schedule 1, pg. 1-2

<sup>4</sup> Exhibit A, Tab 2, Schedule 1, Attachment 1

<sup>5</sup> Exhibit I.FRPO-1,2

<sup>6</sup> Exhibit I.FRPO-3 & 9

<sup>7</sup> Exhibit I.FRPO-4

<sup>8</sup> OEB\_Natural Gas Facilities Handbook\_20220331, pg. 32 Project Need 1 b)

<sup>9</sup> FRPO uses its own resources to analyze the piping.

<sup>10</sup> EB-2024-0186 FRPO\_REPLY\_BOBCAYGEON MOTION\_20240926

**Conclusion**

While the process to elicit sufficient evidence as described above was quite inefficient, FRPO has tested and supports the pipe sizing proposed in the application. Very importantly, we encourage the utility to provide the basic information outlined in the Board's Facilities Handbook to allow a more efficient process in future applications. Ultimately, we urge the Board to instruct Board staff to uphold these requirements in assessing an application for completeness at the outset of a proceeding.

**Costs**

In these proceedings, FRPO strived to assist the Board with a view to facilities matters of the expansion projects. We trust that our submissions are crucial in driving change toward a higher standard of evidentiary submission for facilities projects. We respectfully request the award of 100% of our reasonably incurred costs at such time as the Board calls for those costs.

All of which is respectfully submitted on behalf of FRPO,

Dwayne R. Quinn  
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