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BY EMAIL

March 11, 2025

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Dear Ms. Marconi:

**Re: EB-2024-0322
Kimball-Colinville and Bickford Maximum Operation Pressure (MOP)
Project Application**

Please find attached the Ontario Energy Board (OEB) staff interrogatories in the above proceeding.

Any questions relating to this letter should be directed to Zora Crnojacki, Senior Advisor at Zora.Crnojacki@oeb.ca or at 416-440-8104. The OEB's toll-free number is 1-888-632-6273.

Yours truly,

Original Signed By

Zora Crnojacki
Senior Advisor

Encl.

cc: EGIRegulatoryProceedings@enbridge.com
Henry Ren, Applicant's Counsel, Enbridge Gas Inc., henry.ren@enbridge.com

**OEB Staff Interrogatories
Enbridge Gas Inc.
EB-2024-0322**

Please note, Enbridge Gas Inc. is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff interrogatories and any other supporting documentation, do not include personal information (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's *Rules of Practice and Procedure*.

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Ref.: Exhibit B, Tab 1, Schedule 1, paragraph 2, page 1; Exhibit C, Tab 1, Schedule 1, paragraph 3, page 1; Exhibit H – Risk Assessment, Tab 1, Schedule 1 pages 1-3; Exhibit I, Tab 1, Schedule 1: Ministry of Natural Resources Requirements, with Attachments 3 and 4.

Preamble:

Enbridge Gas applied for approval to increase maximum operating pressure (MOP) of the Bickford Storage Pool to a maximum pressure gradient of 17.64 kPa/m (0.78 psi/ft) during the 2025 injection season and increase MOP in the Kimball-Colinville Storage Pool to a maximum pressure gradient of 16.625 kPa/m (0.735 psi/ft) during the 2026 injection season. Enbridge Gas submitted that these increases in MOP are permitted under CSA Standard Z341.1-22 Storage of Hydrocarbons in Underground Storage Formations (CSA Z341.1-22).

Enbridge Gas noted that the increases in MOP for both storage pools have to conform to the CSA Z341.1-22 to the satisfaction of the Ministry of Natural Resources (MNR).

Clause 5.6.2 (b) of CSA Z341.1-22 requires that "The maximum operating pressure shall not exceed 80% of the fracture pressure of the caprock formation. In the absence of local fracture pressure data, the maximum pressure shall be not greater than 18.1 kPa per metre of depth to the top of the reservoir."

Enbridge Gas met with the MNR on September 16, 2024 to present the Project to the MNR staff.

On November 26, 2024 Enbridge Gas sent an email to the MNR on November 26, 2024, indicating that the following studies had been conducted for each pool in compliance with CSA Z341.1-22 and to support the application:

- Engineering studies completed by Geofirma Engineering Ltd.
- Assessment of Neighbouring Activities for the storage pools as prescribed by CSA Z341.1-22 Clause 5.2.
- “What If” analysis of hazards and operability (HAZOP) for the storage pools

Enbridge Gas also stated that it sent summaries of the studies to the MNR and that it would make complete studies available in Enbridge Gas’s office for the MNR’s review.

According to Enbridge Gas, the MNR stated that it would provide its comments on the engineering and geological studies and on Enbridge Gas’s compliance with the CSA Z341.1-22 requirements as related to the proposed MOP increases in Bickford Storage Pool and in Kimball-Colinville Storage Pool.

Questions:

- a) Since filing the application, has Enbridge Gas received any further communication from MNR regarding the review of the studies completed in compliance with CSA 341.1-22?
- b) If any communication was received, please indicate whether the MNR stated it is satisfied with the studies and that Enbridge Gas complied with all relevant requirements under CSA Z341.1-22, and related regulations.
- c) Please file a copy of any additional correspondence with MNR since the application was filed.
- d) If no communication has been received from the MNR regarding the final review and compliance with CSA Z341.1-22, what is the anticipated date of receiving the documentation from the MNR?

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Ref.: Exhibit A , Tab 2, Schedule 1, paragraph 10, page 4 and Exhibit C, Tab 1, Schedule 1, Proposed Facilities, pages 5-8

Preamble:

According to Enbridge Gas's application, the project will also include replacements of components of Bickford Station in the Bickford Storage Pool and upgrades to wellheads and well crossovers, installation of emergency shutdown (ESD) valves on injection/withdrawal natural gas storage wells, re-abandonment of one natural gas storage well, replacement of well lateral tees, various natural gas gathering pipeline replacements, and replacements of various components in the Kimball-Colinville Station within the Kimball-Colinville Storage Pool.

Questions:

- a) Please confirm Enbridge Gas is not seeking approval of the pipeline replacements and various facility upgrades in Bickford Storage Pool and in Kimball-Collinville Storage Pool.
- b) Please discuss whether (and if so, how) the proposed facility upgrades will benefit Enbridge Gas's in-franchise customers.

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Ref.: Exhibit B, Tab 1, Schedule 1, paragraph 1, page 1

Preamble:

Enbridge Gas stated that the need for creating additional storage capacity by increasing the MOP is underpinned by growing market demand for incremental storage space and the incremental capacity will be used for unregulated storage services. The project will create an additional 137,200 10^3m^3 of storage capacity, to be sold as part of Enbridge Gas's unregulated storage business. 24,500 10^3m^3 in the Bickford Storage Pool and 112,700 10^3m^3 in the Kimball-Colinville Storage Pool

Questions:

- a) Please provide the splits of current capacity of the Bickford Storage Pool and Kimball-Colinville Storage Pool between regulated and unregulated storage customers.

- b) Please provide the split of regulated vs unregulated capacity assuming the increase in the MOP is implemented for Kimball-Colinville Storage Pool and for Bickford Storage Pool.
- c) Please describe how Enbridge Gas has determined growing market demand for unregulated storage services that underpins the need to for the additional storage capacity in Kimball-Colinville Storage Pool and Bickford Storage Pool.