

EB-2025-0073
Enbridge Gas – Mississauga Reinforcement Project

Interrogatories of Environmental Defence

Interrogatory #1-ED-1

Reference: Exhibit B

Question(s):

- (a) Enbridge indicates that the project will reduce greenhouse gas emissions. Please provide an estimate of the greenhouse gas emissions reductions that will be achieved based on the contracted gas quantities. Please account for both fuel substitution (i.e. substituting gas for a different fuel with a different carbon intensity) and incremental gas use that does not replace use of other fuels. Please provide all calculations, inputs, and assumptions. Please provide a response on an approximate, best-efforts basis, noting caveats where necessary.
- (b) Please provide a revised version of the response to (a) which accounts for the upstream greenhouse gas emissions attributable to use of methane gas. We recommend using the default emissions factors underlying the clean fuel standard, which can be found in the evidence of the ongoing Enbridge rebasing case.

Interrogatory #2-ED-2

Reference: Exhibit C

Question(s):

- (a) Enbridge ruled out three alternatives due to a lack of available land: rebuilding the station at Winston Churchill Boulevard and Royal Windsor Drive and constructing new stations in Oakville (Alternative 1) or Mississauga (Alternative 2). Please provide a high-level approximate cost difference between the chosen alternatives and each of those three alternatives, excluding the cost to purchase the required land.
- (b) Did Enbridge offer landowners an amount equal or close to the savings that would accrue to ratepayers by selecting one of the alternatives noted in (a)? If not, why not, and what amount was offered?

Interrogatory #2-ED-3

Reference: Exhibit C

Question(s):

- (a) What alternative pipeline materials were explored by Enbridge in designing this project?

- (b) Based on the best information currently available to Enbridge, what pipeline materials are best suited for carrying 100% hydrogen? Please discuss and provide links to supporting materials.
- (c) Approximately what would the cost and the profitability index for the project be if pipeline materials most likely to be appropriate for carrying 100% hydrogen were used?
- (d) Approximately what would the cost and the profitability index for the project be if polyethylene pipes were used (and other adjustments made to allow for that material)?
- (e) Please provide a table listing all infrastructure and components that Enbridge plans to build via this project with a column showing the likely suitability for 100% hydrogen.
- (f) What additional steps can be taken to ensure, or at least increase the likelihood, that the infrastructure being installed will be compatible with 100% hydrogen.
- (g) Please discuss the potential role for 100% hydrogen in decarbonizing industrial uses, including those that are difficult to decarbonize.
- (h) Do any of the customers along the relevant pipeline use gas for high-heat or other processes that are difficult to decarbonize through electrification?

Interrogatory #3-ED-4

Reference: Exhibit E

Question(s):

- (a) It appears that incremental revenue is only accruing in years 1 to 9 in the DCF tables. This presumably corresponds to the signed distribution contracts. Is that correct? If not, please explain.
- (b) Does Enbridge anticipate that at least some of the volumes will be recontacted at the end of the relevant contract terms? If yes, approximately what percent?
- (c) In light of the above, does Enbridge believe that the project economics are represented conservatively for this project?
- (d) Please reproduce the DCF table using Enbridge's best estimate of the incremental revenue that will arise from this project, including incremental revenue that is not guaranteed by a firm contract?

Interrogatory #3-ED-5

Reference: Exhibit E

Question(s):

- (a) Please reproduce the DCF analysis listing actual years (instead of 1, 2, 3, ...). Please also exclude the operating cash flow figures (revenue and operating expenses) from the years that are within the current rate term.
- (b) Please confirm that the revenues and operating costs occurring during this rate term will only accrue to existing ratepayers as benefits or costs to the extent that the earnings sharing mechanism is triggered in those years. Please discuss.