

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 in the communities of Lanark and Balderson.

As with more recent applications, though, we were challenged in our capability primarily due to the lack of specificity - system pressures, flows, pipe sizes of the existing feeding system and 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.

Moreover, in the evidence and response to interrogatories, EGI makes some dismissive claims about the need to establish an evidentiary basis for their choice of pipeline sizing and the impact on the new ratepayers in these communities and eventually the risks of impacts on the broader ratepayers,¹ including FRPO. In response to EGI's assertions, we believe that the Board's jurisdiction and authority ought to be reinforced to EGI for the benefit of regulatory efficiency and the public interest.

Ontario Government Approval does not Extend to Facilities Sizing

We understand and respect that this set of projects were applied for and accepted as part of the Ontario Government's Phase 2 NGEF, as specified in the Expansion of Natural Gas Distribution System Regulation.² 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.

In the Application for the project, EGI states:

Considering that the Project was previously reviewed and approved by the Government of Ontario and the OEB for the purposes of granting funding under Phase 2 of the NGEF, Enbridge Gas did not assess other facility alternatives.

In our view, this statement appears to infer that EGI does not have to provide evidence to satisfy the Board of prudence in the determination of proposed facilities sizing. In response to our inquiry,³ EGI confirmed that it does not provide appropriate

¹ Exhibit I.CNL-33

² Ontario Regulation 24/19 Expansion of Natural Gas Distribution Systems, Schedule 2

³³ Exhibit I. FRPO-1

information (e.g., simulations results) to allow an assessment of the proposed facilities to support the forecasted demand in the NGEF application process.⁴

In response to our second IR, EGI provided the type of data one would expect to form the basis for facilities sizing. The forecasted hourly demand and resulting pressures determined by simulation provide proper evidence for the assessment of pipe sizing. In addition, upon our inquiry about downsizing, EGI was responsive providing the Board with evidence of the robustness of their proposed facilities. Given the answers received, if EGI's forecasted demand is appropriate, we have no concerns with the facilities proposed. Very importantly, in our respectful submission, the answers in FRPO-2 ought to be part of each facilities application to allow the Board to exercise its authority in approving the proposed facilities.

However, it appears that EGI does not agree based upon their recent facilities submissions and their response to our question on their "*views on its obligation to review multiple scenarios for the purpose of determining the appropriate pipe size*".⁵ EGI's response stated:

Enbridge Gas is not obligated to review multiple scenarios to determine appropriate pipe size for the purposes of this application as per the filing requirements listed in section 4.5 of the OEB's Natural Gas Facilities Handbook.

While it is factually correct that EGI is not obligated to advance multiple scenarios by the minimum filing requirements of Section 4.5 of the Facilities Handbook, EGI fails to provide that in the previous section, 4.4.2, the Handbook directs:

*The applicant must **demonstrate** that the identified need is best addressed by the proposed project, having adequately considered all viable alternatives (including other pipeline solutions, non-pipeline solutions including integrated resource planning (IRP) alternatives discussed in further detail below, or any combinations thereof).*⁶ **(emphasis added)**

If EGI is really interested in regulatory efficiency,⁷ the application would document its assessment of facilities alternatives with the commensurate data to provide the Board with evidence of its assessment. This adherence to the Facilities Handbook would

⁴ It is notable that the hourly demand which is needed to determine the appropriate facilities sizing for distribution piping was not provided in the application as noted in our preamble to Exhibit I.FRPO-2.

⁵ Exhibit I. FRPO-2 b), vi. 1. b.

⁶ EB-2022-0081 Natural Gas Facilities Handbook, issued March 31, 2022, Section 4.4.2

⁷ EGI_EB-2025-0306_Intervention_Response_01302026

preclude the time spent by intervenors, such as FRPO, to piece together puzzles to test the right sizing of the pipe.⁸

Conclusion

FRPO has no issue with the proposed facilities in the application. Notably, we, once again, encourage the Board to direct 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 the 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,

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⁸ For efficiency, FRPO submitted these concerns in a recent facilities application from which have extracted as an excerpt and have attached for the efficiency and ease for the reader

Excerpt from EB-2023-0343

Project Piping Submissions

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 facilities sizing, 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. FRPO has provided the Board with similar concerns in recent facilities applications.

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.¹

Instead, when the application provides a description of the pipe layouts (in this application in nine separate sections)² and a map shows pipe routing without labelling of sections,³ 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.⁴ From there, one needs to understand how the segments are fed (station location) and the location of the specific sizes of pipes.⁵ With the basic pipe layout and feeding stations (supply) now understood, one needs to construct the customer load amongst the sections (demand).⁶ 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.⁷

¹ EB-2022-0081 Natural Gas Facilities Handbook, issued March 31, 2022

² Exhibit B, Tab 1. Schedule 1, pg. 1-2

³ Exhibit A, Tab 2, Schedule 1, Attachment 1

⁴ Exhibit I.FRPO-1,2

⁵ Exhibit I.FRPO-3 & 9

⁶ Exhibit I.FRPO-4

⁷ OEB_Natural Gas Facilities Handbook_20220331, pg. 32 Project Need 1 b)