



PUBLIC INTEREST ADVOCACY CENTRE  
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January 14, 2020

VIA E-MAIL

Christine E. Long  
Registrar and Board Secretary  
Ontario Energy Board  
Toronto, ON

Dear Ms. Long:

**Re: EB-2019-0276 – EPCOR Natural Gas Limited Partnership  
Motion to Review and Vary EB-2018-0336  
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)**

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Please find attached the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

A handwritten signature in black ink, appearing to read 'M Garner', is written in a cursive style.

Mark Garner  
Consultants for VECC/PIAC

Email copy:  
Vince Cooney, ENGLP  
[vcooney@epcor.com](mailto:vcooney@epcor.com)

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For interrogatory clarifications please contact Mark Garner at 647-408-4501 or [markgarner@rogers.com](mailto:markgarner@rogers.com)

**REQUESTOR NAME**                      **VECC**  
**TO:**    **ENGLP**  
**DATE:**                                         **January 14, 2020**  
**CASE NO:**                                    **EB-2019-0276**  
**APPLICATION NAME**                      **Motion to Review and Vary EB-2018-0336**

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**NB: Affidavit of Brian Lippold, December 4, 2019 (Affidavit)**

VECC-1

Reference: Affidavit, page 5

*“The fall 2014 service interruptions arose due to a delayed grain drying season, that overlapped with prolonged periods of sub-zero temperatures, and which created an unsustainable demand for gas from both industrial-commercial customers and residential customers. Consequently, NRG experienced system pressure drops in the Northeast quadrant near Brownsville, to as low as 5 psi. When the pressure drops below 10 psi, there is a serious risk of system outages.”*

- a) Please explain what (if any) customers were interrupted in 2014 due to low pressure issues.
- b) Are seasonal grain (and other crop) drying customers generally or exclusively interruptible load customers? What is the total number of firm and interruptible customers?
- c) Other than the fall/winter 2014 event what other experience has ENGLP had with pressure being below 10 psi in the Brownsville service area?

VECC-2

Reference: Affidavit, page 5 & 15

- a) Please provide a map showing the location of new customers added along the Putnam-Culloden pipeline.
- b) Please identify any attachments forecast over the next two years along the pipeline route. Specifically, please show the location of the anticipated 250 residential customers in the South-West Oxford area.

VECC-3

Reference: Affidavit, page 10

- a) Paragraph 33 at the above reference compares an SNC recommended pipeline to the route chosen by ENGLP (then NRG). Does the route described in paragraph 34 meet the same objectives as set out in the SNC Study?
- b) Did ENGLP do a cost comparison of the projects described in paragraph 33 with that described in paragraph 34? If so, please provide that cost comparison.

VECC-4

Reference: Affidavit, page 13

- a) Mr. Lippold explains that he felt compelled to address the risks associated with low pressure in the Brownsville area prior to another winter season. Was the Putnam-Culloden pipeline completed prior to the 2015 winter season?

VECC-5

Reference: Affidavit - general

- a) Other than expanding pipeline where any demand side options explored to mitigate low pressure issues? If so, what options were considered and why were they rejected.

VECC-6

Reference: Affidavit, page 17

- a) What project might have been completed in 2015 to alleviate the need for NRG Corp supplied gas to the Southeast quadrant of the ENGLP (NRG) distribution system?
- b) What was the incremental (delta) total cost of NRG Corp supplied gas in each of 2015 through 2019? That is, what was the annual premium paid for natural gas in each of those years.

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