

Ms. Nancy Marconi
Registrar
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

June 10, 2022

**EB-2022-0086 – Dawn to Corunna Replacement Project Leave to Construct
Pollution Probe Interrogatoires**

Dear Ms. Marconi:

In accordance with Procedural Order No. 1 for the above-noted proceeding, please find attached Interrogatories to the Applicant.

Respectfully submitted on behalf of Pollution Probe.



Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Consultant to Pollution Probe
Phone: 647-330-1217
Email: Michael.brophy@rogers.com

Cc: Adam Stiers, Enbridge Regulatory (via email)
Tania Persad, Enbridge Legal (via email)
All Parties (via email)
Richard Carlson, Pollution Probe (via: email)

ONTARIO ENERGY BOARD

**Enbridge Gas Inc.
Dawn to Corunna Replacement
Leave to Construct**

POLLUTION PROBE INTERROGATORIES

June 10, 2022

**Submitted by: Michael Brophy
Michael Brophy Consulting Inc.
Michael.brophy@rogers.com
Phone: 647-330-1217
28 Macnaughton Road
Toronto, Ontario M4G 3H4**

Consultant for Pollution Probe

1-PP-1

Reference: Enbridge Gas Inc. has identified the need to abandon, remove and replace up to seven (7) reciprocating compressor units located at the Corunna Compressor Station (“CCS”)... [Exhibit A, Tab 2, Schedule 1, Page 1 of 4]

- a) Please provide how Enbridge will determine how many of the 7 compressor units would be replaced and the analysis approach behind that decision.
- b) Please explain why all 11 compressor units at this site can't be removed if the new pipeline is constructed.
- c) Please explain what the minimum number of compressors is for this site in order for it to operate and what the storage system impacts are if additional compressors were removed.
- d) Please provide any reports and/or analysis that support retaining 4 compressors at the Corunna site and replacing only 7 compressors due to reliability, obsolescence and safety concerns.

1-PP-2

- a) Is this project part of a broader plan for gas storage assets and operation or a stand-alone project? If it is part of a broader plan, please provide a copy of that document. If not, please explain why this project was not assessed as part of the broader storage system.
- b) Please explain what existing pipelines connected to other compressor stations cannot be used instead of building an additional new pipeline.
- c) Aside from replacing up to 7 compressors, please identify any other benefits that would result from the project (if any).

1-PP-3

Reference: Figure 1 EB-2022-0086, Exhibit B, Tab 1, Schedule 1

- a) Does Figure 1 show all compressor stations in the storage system or only Corunna?
- b) Please provide a version of Figure 1 (or equivalent map) showing all compressor stations in the storage system.
- c) For each compressor station referred to in part b (above), please provide short description of the purpose and how it relates to Corunna.

1-PP-4

- a) Please identify when this project was first identified as being potentially required and explain why the urgency has increased to the point requiring action.
- b) Please provide the reference and excerpt from the most current updated Enbridge Asset Management Plan outlining details on this project and where it ranks against other projects in the current Asset Management Plan.

1-PP-5

Reference: “the Company has experienced continued and increasing compressor unit downtime and long lead repair time.” [Exhibit B, Tab 1, Schedule 1, Paragraph 25]

- a) Please provide a log and related information outlining the downtime for each of the 11 compressors at the Corunna Station.
- b) Please summary what incremental O&M or Capital costs resulted from the downtime and long lead time repair.
- c) Please provide information related to each compressor at the Corunna Station illustrating the magnitude of “increasing compressor downtime”.

1-PP-6

Reference: “Enbridge Gas serves approximately 3.8 million customers in over 500 communities in Ontario through an integrated network of over 84,000 km of natural gas pipelines” [Exhibit B, Tab 1, Schedule 1, Paragraph 13]

Please provide a source reference for the over 500 communities in Ontario served by Enbridge and reconcile this against the total of 444 municipalities that exist in Ontario (of which Enbridge serves a subset).

1-PP-7

Please provide the date of installation and HP rating for each of the 11 compressors at the Corunna Station and indicate which of these units are proposed to be replaced through this project.

1-PP-8

Reference: Enbridge's application references EB-2020-0181, Enbridge Gas Inc. Asset Management Plan 2021-2025, Exhibit C, Tab 2, Schedule 1, pp. 194-195.

- a) The 2021 Asset Management Plan reference provided above indicates that Enbridge is "using 40 years as a guideline for indicating a critical point in an asset's life..." [page 194 of above reference]. Please provide the basis for using 40 years as a guideline.
- b) The graph in Figure 5.5-4: Age Range of Compressor Plant Installation [page 194 of above reference] indicates that 14 compressors exceed the 40 year Enbridge replacement guideline. Please explain why only 7 are being considered for replacement.

2-PP-9

Reference: "Enbridge Gas assessed 4 facility alternatives capable of providing design day storage capacity equivalent to the existing 7 CCS compressor units proposed to be retired and abandoned" [Exhibit C, Tab 1, Schedule 1, Page 18 of 25]

- a) Please provide any documentation and/or analysis conducted that validates that the current design capacity for the Corunna Station is needed to meet future needs over the next 40 years.
- b) Please provide documentation on any IRP analysis and options conducted for this project.
- c) Please confirm that Enbridge did not conduct a 40 year demand forecast to validate the peak demand capacity that would be provided by the project options consider and the proposed project. If Enbridge did conduct that analysis, please provide a copy.

2-PP-10

Please confirm that the Environmental Report only assessed the proposed pipeline option selected by Enbridge and did not compare the other alternatives identified in the Leave to Construct application. If that is incorrect, please provide the references to where all project alternatives were compared from an Environmental and Socio-economic perspective.

2-PP-11

If the proposed pipeline alternative is approved, where will compression for peak storage come from?

3-PP-12

- a) Enbridge is currently coordinating its rebasing application for 2024. Please explain how this project relates (if at all) with rebasing.
- b) Enbridge indicates that if the OEB approves this project, it may be included in Enbridge's 2023 Rates (Phase 2-ICM) application. Will Enbridge proceed with this project if it does not receive ICM funding?

4-PP-13

Please provide an updated project schedule including major milestones including permits and approvals.