

SCOTT POLLOCK  
T 613.787.3541  
spollock@blg.com

Borden Ladner Gervais LLP  
World Exchange Plaza  
100 Queen St, Suite 1300  
Ottawa, ON, Canada K1P 1J9  
T 613.237.5160  
F 613.230.8842  
blg.com



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June 10, 2022

Nancy Marconi  
Acting Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> floor  
Toronto, ON M4P 1E4

Dear Ms. Marconi

**Re: Enbridge Gas Inc. (“EGI”)  
EGI Natural Gas Pipeline Leave to Construct Application – Dawn to Corunna  
Replacement Project  
Board File #: EB-2022-0086**

Please find attached Canadian Manufacturers and Exporter’s interrogatories in the above-noted proceeding.

Yours very truly

A handwritten signature in blue ink, appearing to read 'Scott Pollock', is written over a light blue horizontal line.

Scott Pollock  
SP/tb

c. Mathew Wilson & Allison Bernholtz (CME)  
Allison Bernholtz (CME)

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Schedule B, and in particular, sections 90 (1) and 97 thereof;

**AND IN THE MATTER OF** an Application by Enbridge Gas Inc. for an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities from the Township of Dawn-Euphemia to St. Clair Township;

**AND IN THE MATTER OF** an Application by Enbridge Gas Inc. for an Order or Orders approving the proposed forms of agreements for Pipeline Easement and Options for Temporary Land Use.

**INTERROGATORIES OF  
CANADIAN MANUFACTURERS & EXPORTERS (“CME”)  
TO ENBRIDGE GAS INC. (“EGI”)**

**Interrogatory CME-1**

**Ref: Exhibit B, Tab 1, Schedule 1, pp. 11 of 31**

At pp. 11, EGI stated that it had “also undertaken comprehensive studies, including a site-wide quantitative risk assessment (“QRA”) to determine the severity of the increasing safety risks.”

- (a) To the extent it is not already placed on the record, please file the QRA study completed relevant to the matters at issue in this application.
- (b) When was the QRA completed?

**Interrogatory CME-2**

**Ref: Exhibit B, Tab 1, Schedule 1, pp. 13 of 31**

At pp. 13, EGI stated “Through such assessment the Company has identified serious and increasing obsolescence and reliability risks associated with CCS compressor units K701-K703 and K705-K708. This is due to both the amount of repair downtime experienced and system shortfall that could result from their failure considering the Company’s dependence upon these facilities to meet peak design conditions.”

- (a) Please describe EGI’s risk analysis process fully. For instance, does EGI use a risk assessment that employs likelihood of occurrence x impact of occurrence = risk, or another metric to evaluate risk.
- (b) As CME understands it, the risk represented by the compressors at issue would have increased steadily as the assets aged and through wear and tear. Please describe

whether there is an objective risk level where EGI determined the risk was too high and replacement was necessary.

- (c) If the answer to (b) is yes, please identify the level of risk that EGI determined was needed before the project was warranted.
- (d) If the answer to (b) is no, please provide the subjective reasons why EGI determined that the risk was too high in 2022 rather than earlier or later.

### **Interrogatory CME-3**

**Ref: Exhibit C, Tab 1, Schedule 1, Attachment 2, p. 6.**

At p. 6, ICF indicated that “Enbridge is proposing to replace this capacity by construction of a new 36-inch diameter steel pipeline between the Corunna Compressor Station in St. Clair Township and the Dawn Operations Centre in the Township of Dawn-Euphemia.”

- (a) Given that ICF completed its report with EGI’s proposed solution in mind, did EGI complete its own internal review of options to determine that it preferred the NPS-36 pipe prior to receiving ICF’s analysis?
- (b) If the answer to (a) is yes, please provide any internal studies or analysis completed by EGI in this regard.
- (c) Please provide any materials related provided to EGI’s board of directors with respect to its own analysis or review of potential options.

### **Interrogatory CME-4**

**Ref: Exhibit C, Tab 1, Schedule 1, Attachment 2, p. 9.**

At p. 9, ICF explained that EGI considers the replacement of firm delivery lost is mandatory in order to maintain the safety and reliability of the system. ICF also explained that EGI considers storage space to be optional. ICF notes that storage space however also increases flexibility and reliability.

- (a) If both firm delivery and storage space increase reliability, please explain why some benefits to reliability are considered mandatory and others are considered optional.
- (b) What impact does the deferral of significant capital spending, such as the \$18.3 million underspend in 2021 due to, *inter alia*, delays in larger projects, have on the project prioritization process going forward?

### **Interrogatory CME-5**

**Ref: Exhibit C, Tab 1, Schedule 1, Attachment 2.**

In its report, ICF included a number of calculations with respect to the cost of various alternatives.

- (a) Did ICF calculate the various monetary figures in its report, or was it provided with any by EGI.
- (b) To the extent that the answer to (a) is yes, please identify which figures were provided by EGI and which were calculated by ICF.