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

Attention: Ms. Nancy Marconi, Registrar

Dear Ms. Marconi:

**Re: Enbridge Gas Inc. (EGI)
OEB File No. EB-2022-0086 - Dawn to Corunna Replacement Project
TransCanada PipeLines Limited (TCPL) Interrogatories**

Enclosed are the interrogatories of TransCanada PipeLines Limited. Should you have any questions, please contact the undersigned.

Yours truly,
TransCanada PipeLines Limited

Original signed by

Namrita Sohi
Legal Counsel
Canadian Law, Natural Gas Pipelines

cc: Adam Stiers, Enbridge Gas Inc.
Tania Persad, Enbridge Gas Inc. Counsel
Charles Keizer, Torys

Enclosure

Number: TCPL-EGI-1

Reference: i) Exhibit B, Tab 1, Schedule 1, Page 3 of 31, Paragraph 6.
ii) EB-2021-0148, 2022 Rates (Phase 2) Application, Exhibit B, Tab 2, Schedule 1, Appendix G, Page 4 of 4.

Preamble: In Reference i), EGI states that if the Dawn to Corunna Replacement Project (the Project) meets the criteria for rate recovery through the Incremental Capital Module (ICM) mechanism then EGI may file an ICM request for cost recovery as part of EGI's 2023 Rates (Phase 2) application.

In Reference ii), EGI provides a table showing the Derivation of 2022 Incremental Capital Module Rates by Rate Class, including the ICM Revenue Requirement, Forecast Usage, and the resulting ICM Rate.

Request:

- a) If the Project is approved and is found to be fully eligible for ICM treatment, please confirm whether EGI would expect an ICM rate rider to apply to Rate 332, Rate M12, Rate M12-X, or Rate C1 rate classes for cost recovery associated with the Project.
- b) If EGI expects an ICM rate rider to apply to any of the rate classes identified in a), please quantify the ICM rate riders that EGI currently anticipates would apply to such rate classes by providing a table in similar form as that provided in Reference ii). Please list all assumptions made in the analysis.
- c) If the Project is approved but is not found to be eligible for ICM treatment, please explain how the costs associated with the Project would be treated by EGI and how such treatment could impact the rates paid by customers, including the rate classes identified in a).

Number: TCPL-EGI-2

Reference:

- i) Exhibit B, Tab 1, Schedule 1, Page 6 of 31, Paragraph 15 and 16.
- ii) Exhibit B, Tab 1, Schedule 1, Page 8 of 31, Paragraph 18.
- iii) Exhibit B, Tab 1, Schedule 1, Page 7 of 31, Figure 2.

Preamble: In Reference i), EGI describes how the Corunna Compressor Station (CCS) is a part of the Dawn Hub which connects to transmission pipelines that transport gas from storage to downstream markets. EGI also describes the storage pools and storage pool pipelines served by the CCS.

In Reference ii), EGI describes the existing NPS 30 transmission pipelines known as TR1 and TR2 which connect the CCS to the Dawn Hub Operations Centre.

In Reference iii), EGI shows a map of the Dawn Hub and Storage Facilities including interconnected pipelines upstream and downstream of the facilities.

Request:

- a) Do any of the upstream pipelines shown in Reference iii) (i.e., Bluewater, ANR, GLGT, Great Lakes Canada, Vector, Michcon, Panhandle) connect to or serve the CCS facility either directly or indirectly, without first delivering to the Dawn Hub Operations Centre? If so, please provide details of such upstream pipeline connections to the CCS, including the connection sizes and capacities, and explain how the CCS is served by these pipelines.
- b) If approved and put into service as applied for, how will the Project affect the capacities, throughput or operations of the storage pool pipelines, the TR1 or TR2 NPS 30 pipelines, the Sarnia Industrial Line (SIL), each of the upstream pipelines identified in a), or the Dawn-Parkway transmission system? Please explain and quantify any such capacity, throughput, pressure, receipt and delivery, or other operational effects.

- c) Please provide a table quantifying the monthly gas flows into and out of each of the CCS and the Dawn Hub Operations Centre since 2018 up to March 2022.
- d) Please explain whether EGI expects the monthly gas flows into and out of each of the CCS and the Dawn Hub Operations Centre to be impacted as a result of the Project. If monthly flow impacts are expected, please quantify such impacts in a similar table as provided for in c) and explain the reasons for the impacts.

Number: TCPL-EGI-3

- Reference:**
- i) Exhibit B, Tab 1, Schedule 1, Page 3 of 31, Paragraph 5.
 - ii) Exhibit B, Tab 1, Schedule 1, Page 2 of 31, Figure 1.
 - iii) Exhibit B, Tab 2, Schedule 1, Page 7 of 8, Paragraph 15.
 - iv) Exhibit B, Tab 2, Schedule 1, Page 7 of 8, Table 1.
 - v) Exhibit C, Tab 1, Schedule 1, Attachment 2, Page 57 of 66.
 - vi) EB-2022-0072, 2022 Annual Gas Supply Plan Update, Page 18, Figure 8.
 - vii) Exhibit C, Tab 1, Schedule 1, Page 24 of 25, Paragraph 48.

Preamble:

In Reference i), EGI describes how the project is designed to maintain design day storage capacity/deliverability and equivalent injectability; is being driven by system reliability, obsolescence, and employee safety concerns; and will not create any incremental design day space and/or deliverability.

In Reference ii), EGI shows a map of the Dawn to Corunna Replacement Project. For the purposes of this interrogatory, the facilities at the Corunna Compressor Station, the facilities at the Dawn Hub Operations Centre, and the three 20 km pipelines connecting the two facilities (two existing NPS 30 lines and one proposed NPS 36 line) will be referred to as the “Dawn to Corunna System”.

Reference iii) describes how EGI expects the forecast storage requirements for bundled in-franchise customers to be in excess of the allocated cost-based storage space. EGI also projects forecast customer demand to increase, meaning the requirement for storage space in excess of the allocated cost-based storage is expected to continue for the foreseeable future.

In Reference iv), EGI presents a table showing the in-franchise storage requirement forecast out to 2024/25. The table shows a storage requirement for the EGD Rate Zone in excess of the available cost-based storage.

In Reference v), ICF states that the CER is projecting continued long-term growth in Ontario gas demand for residential, commercial, and industrial customers.

In Reference vi), EGI presents evidence prepared by ICF for the purposes of the 2022 Annual Gas Supply Plan Update showing significant growth in Ontario natural gas demand out to 2045.

In Reference vii), EGI states that constructing an NPS 36 pipeline will enable Enbridge Gas to maintain regulated withdrawal capacity of 1.89 PJ/d; maintain regulated injection capacity of 0.84 PJ/d; and maintain the regulated working capacity of 99.4 PJ.

Request:

- a) Does EGI expect more injection and withdrawal capacity will be required in the future for the Dawn to Corunna System or to serve the EGD Rate Zone if the forecast growth in References iii) through vi) materializes? If so, when would EGI expect such an expansion of injection and withdrawal capability to be necessary, and how much incremental capacity could be required? Please provide answers for the period to the year 2024/25, and for the period from 2024/25 to 2045.
- b) If the answer to a) is yes, please explain EGI's expectations for where the gas supply for such an expansion would be sourced, and how such gas would be transported to the Dawn to Corunna System or the EGD Rate Zone.
- c) Given the forecast growth in References iii) through vi), please explain why EGI is proposing to maintain design day storage capacity/deliverability and equivalent injectability as stated in Reference i) rather than proposing to create incremental design day space and/or deliverability to meet future requirements?
- d) Did EGI consider the future expandability of the Dawn to Corunna System when evaluating the Project and its alternatives? Please explain why or why not, and what factors were considered.
- e) If EGI were to expand the Dawn to Corunna System beyond the capacity envisioned in the Project, what facility upgrades might be contemplated to increase injection and withdrawal capacity?
- f) If the project is completed as applied for (maintaining the capacities listed in Reference vii) by retiring seven compressor units and

constructing 20km of NPS 36 pipeline), please quantify the maximum injection and withdrawal capacities that could be added in the future by installing incremental compression at the CCS?

- g) Is EGI aware of any storage expansion projects in the Dawn area that could drive a need for incremental injection/withdrawal capacity for the Dawn to Corunna System? If so, please describe the location, capacity, and timeline of such projects.