

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

September 6, 2024

**EB-2024-0200 St. Laurent Project Leave to Construct
CAFES Ottawa Interrogatories to Applicant**

Dear Ms. Marconi:

In accordance with OEB direction, please find attached CAFES Ottawa's interrogatories to the Applicant. The following appendices have been filed in parallel.

CAFESOttawa_IR_AppendixA_StLaurentArticle_20240906
CAFESOttawa_IR_AppendixB_EnbridgeAdvertisement_20240906
CAFESOttawa_IR_AppendixC_OttawaHydroCEOmessage_20240906

Respectfully submitted on behalf of CAFES Ottawa.



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Cc: Enbridge Regulatory (via EGIRegulatoryproceedings@enbridge.com)
All Parties (via email)
Angela Keller-Herzog, CAFES Ottawa (via email)

ONTARIO ENERGY BOARD

Enbridge Gas Inc.

**St. Laurent Pipeline Replacement Project
Leave to Construct**

CAFES OTTAWA INTERROGATORIES

September 6, 2024

**Submitted by: Michael Brophy
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Toronto, Ontario M4G 3H4**

1-CO-1

Please provide a copy of all presentation, memos and related materials made to Enbridge management, Board of Director and Committees (including the Capital Committees) on the proposed St. Laurent project.

1-CO-2

Has Enbridge completed a forward-looking forecast (i.e. 2050 or beyond) of natural gas annual consumption and/or peak demand for the Ottawa or the area served by the SLP? If no, why not. If yes, please provide a copy.

1-CO-3

Has Enbridge completed a forward-looking forecast (i.e. 2050 or beyond) of natural gas annual consumption and/or peak demand in Quebec or area served by the SLP? If no, why not. If yes, please provide a copy.

1-CO-4

Has Enbridge conducted analysis of projected gas demand in the commercial and industrial sectors out to 2050 or beyond? If no, why not. If yes, please provide a copy.

1-CO-5

Has Enbridge assessed the impact of variation in heating degree days due to climate change over the lifetime of the project? If no, why not. If yes, please provide a copy.

1-CO-6

Has Enbridge undertaken an analysis of energy/climate plans in Quebec (including Gatineau which is served by Enbridge's affiliate Gazifere)? If no, why not? If yes, please provide a copy of the analysis.

1-CO-6

Please provide a copy of the agreement Enbridge Gas Distribution (Ontario utility) has with Gazifere (and any other parties taking gas outside the Ontario franchise area) with a commitment for gas demand/volumes. Please confirm the term of the agreement if not included in the document.

1-CO-7

Please provide Enbridge's current best estimate of the cost of RNG vs. natural gas (by m3 and GJ). Please provide the source of the information.

1-CO-9

What share of existing natural gas demand in Ottawa does Enbridge believe can be enabled by hydrogen? Where does Enbridge intend to source this hydrogen? Please provide any supporting documentation Enbridge has to support the volumes and sources that could be leveraged.

1-CO-10

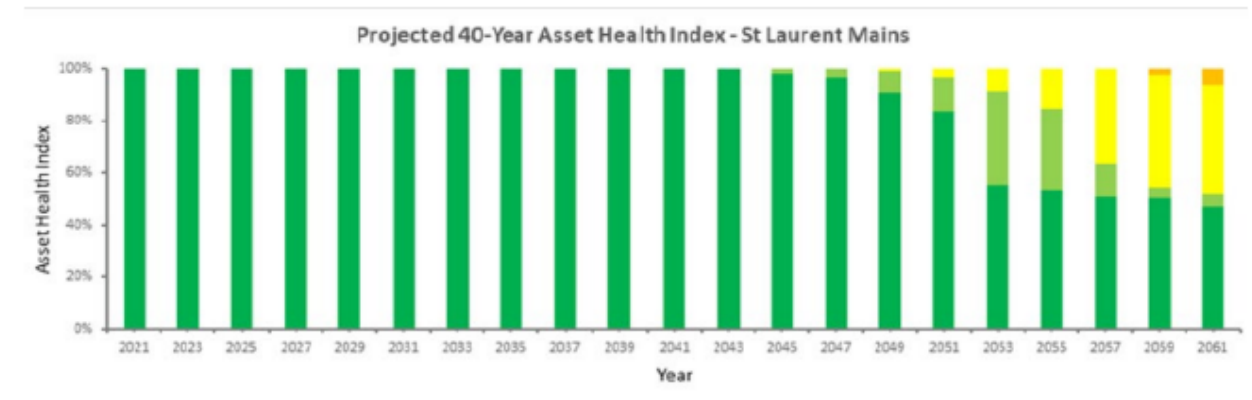
Reference: The results of the physical inspection, integrity assessments, and QRA demonstrate that not only is urgent mitigation required, but also maintaining the status quo as a permanent mitigation strategy is unacceptable because of the current condition and risks associated with the pipeline. If the status quo continues, Enbridge Gas will take extraordinary measures to reduce the operating risk, which will also result in a significant impact on customers. [A/2/2, Page 2]

- a) Please explain what "extraordinary measures to reduce the operating risk" Enbridge will need to take and provide the timeline and cost estimate.
- b) Please explain why Enbridge has not mitigated any of these risk prior to 2024 if they are of concern to Enbridge.
- c) Has Enbridge notified the public of any risks associated with the urgent condition issues for the existing St. Laurent (Extra High Pressure) pipeline? If yes, please provide a copy of all material specific to the urgent risks associated with the current pipeline.
- d) Please provide a copy of all stakeholder (including public, TSSA, etc.) and City of Ottawa (Councillor, Committee, Council, Mayor's Office, etc.) presentations and communications pertaining to the current condition of the existing St. Laurent pipeline.
- e) Please provide a copy of all stakeholder (including public, TSSA, etc.) and City of Ottawa (Councillor, Committee, Council, Mayor's Office, etc.) presentations and communications pertaining to the proposed new St. Laurent pipeline (if not already provided in part d above).

1-CO-11

Reference: St. Laurent Asset Health Index from 2022 [EB-2020-0293 B/1/1, Page 42]

Figure 17: St. Laurent Pipeline Asset Health Index



Please provide an updated version of the St. Laurent Asset Health Index or confirm this is the latest version.

1-CO-12

- Please provide details on the number, duration and scope of integrity digs along the SLP from 2022 – present.
- Please provide a copy of all complaints received from stakeholders (e.g. City, businesses, residents, commuters, etc.) impacted by the integrity digs from 2022 – present.

1-CO-13

- Please provide a copy of the public lobby registry for all Enbridge staff meetings with City of Ottawa officials from April 2022 to present. If any of the Enbridge meetings outlined in the Application are not part of the lobby registry, please explain which ones and why.
- Please provide details on any funding provided by Enbridge (directly or indirectly) to the City of Ottawa or its municipal entities (e.g. councilors, Mayor, community housing, etc.) from April 2022 to present. Please also include which Enbridge account was the source of the funding (e.g. IRP, DSM, Capital, O&M, etc.).

1-CO-14

References:

In mid-October 2023, one of the four ward councillors engaged by Enbridge Gas (Tim Tierney) advised that he was going to put forward a motion supporting the Project and the establishment of an energy task force to the City's Environment and Climate Change Committee, of which he is a member. Enbridge Gas proposed amendments to the councillor's motion.

CBC Article [CAFESOttawa_IR_AppendixA_StLaurentArticle_20240906]

CBC Interview – Councillor Tierney November 22, 2023 [[What's at stake if Ottawa does not back the replacement of an aging natural gas pipeline? | Ottawa Morning with Robyn Bresnahan | Live Radio | CBC Listen](#)]

- a) Please provide a copy of the amendments Enbridge proposed to the draft motion from Councillor Tim Tierney.
- b) Was the Motion passed by City Council? If yes, please provide a copy of the final Motion passed by City Council and record of it passing. If not, why not?
- c) The CBC article and interview referenced above indicates "Tierney said he supports the city's intentions, but after speaking with Enbridge he became concerned that stalling the pipeline replacement could put his residents at risk of a catastrophic power loss.". Please explain what information Councillor Tierney was given to suggest that there was a risk of catastrophic pipeline loss.
- d) The CBC article noted identified Enbridge spokesperson Leanne McNaughton concurred, saying "this does need to be replaced immediately just due to it being an operation for over 60 years.". Please provide the basis for Enbridge publicly indicating that the existing St. Laurent pipeline does not need to be replaced in an urgent manner.

1-CO-15

Reference: CAFESOttawa_IR_AppendixB_EnbridgeAdvertisement_20240906

The Enbridge advertisement noted above was published after the Councilor Tierney radio interview suggesting a catastrophic failure could occur in the St. Laurent pipeline in the winter of 2023/24. Was other advertisement in Ottawa done in relation to the St. Laurent pipeline or to support the proposed project. If yes, please provide a copy.

1-PP-15

Reference: In late November 2023, Enbridge Gas gave a presentation to the Mayor's Breakfast Series that had 250 members of the public in attendance (and was also televised live) to more broadly discuss the need for the Project. The Mayor and three councillors were in attendance at this event. In early December 2023, Enbridge Gas sent a letter through the Ottawa Board of Trade's monthly newsletter to its 5,500 email recipients. At the same time, Enbridge Gas placed newspaper advertisements in the Ottawa Citizen, Ottawa Sun, and le Droit to help members of the public understand the rationale behind the Project. [B/2/1, Page 4]

Please provide copies of the materials (presentation, advertisements, letter, etc.) as referenced above.

1-CO-16

References:

Enbridge identified the need to replace the existing St. Laurent Pipeline through ongoing operations and maintenance (O&M) activities (i.e., inspection and monitoring). The pipeline was originally constructed in four phases in 1958, 1962, 1985, and 1992, and integrity monitoring indicates that the pipeline condition is deteriorating as a result of its age. Enbridge has determined that replacing the pipeline is the best option for maintaining safe and reliable natural gas service to existing customers. [Exhibit F, Tab 1, Schedule 1, Attachment 1, Page 19]

The SLP was originally commissioned between 1958 and 1959 at a pressure of 1,200 kPa (175 psi). [B/1/1, Page 4]

- a) Please reconcile the information indicating that SLP was built between 1959-1992, vs. 1958-1959.
- b) Please provide the lengths constructed during each period.

2-CO-17

Enbridge suggests that Hydro Ottawa is not prepared for fuel switching for space heat to replace gas demand. Has Enbridge evaluated the costs and benefits of upgrading the electricity systems relative to the costs and benefits of the pipeline project? If no, why not. If yes, please provide a copy.

2-CO-18

What share of existing natural gas demand in Ottawa does Enbridge believe can be enabled by renewable natural gas? Where does Enbridge intend to source this renewable natural gas? Please provide any supporting documentation Enbridge has to support the volumes and sources that could be leveraged.

2-CO-19

Please provide the level of DSM and IRP results in Ottawa by year out to 2050 included in the Application's assumptions.

2-CO-20

Reference: A/2/1, Page 3, Table 1

Please explain why the risk to property damage is cited for maintaining the existing pipeline but not for constructing the proposed pipeline. Is Enbridge able to correct the oversight in Table 1?

1-CO-21

References:

Hydro Ottawa letter [B/3/1, Attachment 2] &
CAFESOttawa_IR_AppendixC_OttawaHydroCEOmessage_20240906

- a) Please provide the correspondence related to Enbridge's request for the Hydro Ottawa letter noted above.
- b) Did Enbridge provide a draft letter or summary of details to include in the letter. If no, how did Hydro Ottawa know what was requested by Enbridge. If yes, please provide the materials.
- c) Hydro Ottawa's CEO highlights in its most recent annual report that Hydro One is undertaking the necessary future actions to align with the City's Climate Change Master Plan and Energy Evolution goals. Please reconcile that future commitment with the information in the Hydro Ottawa letter filed by Enbridge.
- d) In the scenario outline where gas consumption drops by 76% by 2050, how will the cost for the proposed Project be allocated to remaining customers? What will be the impact to any remaining Rate 1 customers and those in Ottawa.

4-CO-22

Reference: As discussed in Exhibit G, Tab 1, Schedule 1, as of the date of this filing, Enbridge Gas is in continuing negotiations with landowners regarding land rights required for the Project. [A/2/2, Page 10]

Please explain which portions of the project are outside the municipal right of way and why easements are required.

4-CO-23

Given that portions of the SLP will be not be located on St. Laurent Blvd., what work will be required to connect existing customers on St. Laurent Blvd? Will St. Laurent Blvd have to be (partially or fully) closed for this work?

4-CO-24

- a) Has Enbridge undertaken an assessment for the property damage impacts related to installing 11.2 km of new pipeline and abandoning (which could include removing per City of Ottawa request) 14.4 km of existing pipeline, compared to the impact of isolated repairs along the existing pipeline, if required? If no, why not. If yes, please provide a copy of those materials and analysis.
- b) What information has been provide directly to homes and businesses along the proposed route pertaining to potential impacts noted in part a. Please provide copies of materials directly provided to all homes and business along the proposed route.

4-CO-25

- a) Please confirm that Enbridge intends to abandon in place the current St. Laurent pipeline should the OEB approve the proposed pipeline. If not, please explain.
- b) Does Enbridge have approval from the City of Ottawa to abandon the existing pipeline in place? If yes, please provide a copy.
- c) Please provide the costs estimate of abandoning the existing pipeline in place vs. removing the existing pipeline.