



Enbridge Gas Inc.
50 Keil Drive North
Chatham, Ontario, Canada
N7M 5M1

December 13, 2024

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

Dear Ms. Marconi:

**Re: EPCOR Natural Gas Limited Partnership
Application for a Certificate of Public Convenience and Necessity (Norfolk County)
Enbridge Gas Interrogatories to EPCOR
Ontario Energy Board File Number: EB-2024-0239**

Pursuant to Procedural Order No. 1 to the above noted proceeding, Enbridge Gas hereby submits its interrogatories to EPCOR Natural Gas.

Should you have any questions on this submission, please do not hesitate to contact me.

Yours truly,

Patrick McMahon
Technical Manager
Regulatory Research and Records
patrick.mcmahon@enbridge.com
(519) 436-5325

c.c. (email only): Tim Hesselink, EPCOR Natural Gas Limited Partnership
Tayler Meagher, EPCOR Natural Gas Limited Partnership
Annette Demaiter, 1390204 Ontario Inc.
Chris Demaiter, 2670338 Ontario Inc.
Natalya Plummer, OEB
Richard Lanni, OEB

ENBRIDGE GAS INC.
INTERROGATORIES TO EPCOR NATURAL GAS LIMITED PARTNERSHIP

1. **Reference:** EPCOR Application, pages 5 – 6

“5. EZ Grow requires additional supply of [REDACTED] m³/hr of natural gas to the EZ Grow Facility by November 1, 2024 for the winter growing season, but ENGLP’s current infrastructure is unable to supply this requested volume. In order to meet this request, on February 14, 2024, ENGLP completed an upgrade to a [REDACTED]” pipeline to allow for an intermediary amount of [REDACTED] m³/hr. However, to reach the [REDACTED] m³/hr demand, ENGLP has determined that the most economical and efficient solution from a timing and supply perspective is to construct the New Pipeline and subsequently supply the natural gas to EZ Grow from ENGLP’s existing natural gas distribution infrastructure. A letter of support from EZ Grow is included in Appendix “A”.”

“7. Under ENGLP’s proposed plan, Clearbeach will construct and sell the New Pipeline to ENGLP in order to supply the additional volumes of natural gas to EZ Grow. Clearbeach will construct approximately 2.5 km of [REDACTED]” polyethylene pipe from its existing gas infrastructure through to EZ Grow. A regulating station will be installed at the EZ Grow Facility to reduce pressure to serve the customer, and provide the necessary information from a billing and gas supply perspective. No OEB approvals are needed for this regulating station, as it is located within ENGLP’s Franchise Area and CPCN territory. ENGLP and Clearbeach will have agreements in place regarding construction and quality specifications/standards for the New Pipeline.”

Questions:

- (a) Please confirm whether or not EZ Grow Facility was able to receive additional supplies of gas by November 1, 2024. If yes, then please provide details of the additional supplies provided.
- (b) Please provide a table showing a breakdown of the total cost of the various components of the proposed project including reinforcements needed and a calculation showing that no contribution in aid of construction is required.
- (c) Please confirm whether or not EZ Grow will pay the full cost of the upgrade to the pipeline completed on February 14, 2024 to allow for an intermediary amount to be provided to the EZ Grow Facility.
- (d) Please confirm whether or not the operations of EPCOR and Clearbeach Resources Inc. are affiliated in any way.
- (e) Please confirm that Clearbeach does not have any employees, but rather operates using contractual arrangements with a Lagasco Inc. company pursuant to which personnel and services are provided to Clearbeach in connection with the management, operation and maintenance of Clearbeach’s oil and gas wells and associated infrastructure.
- (f) Please confirm that EPCOR’s application is considered a bypass of Enbridge Gas’ system.
- (g) Please confirm whether the service proposed to be provided by EPCOR to the EZ Grow Facility is firm service or interruptible service or a combination of the two.
- (h) Has a study been conducted on how much gas is still in the wells that will supply the proposed pipeline being constructed by Clearbeach? If yes, please provide details of the study, including an explanation as to how long Clearbeach will be able to supply EPCOR and the EZ Grow Facility (assuming typical annual usage).
- (i) What is the anticipated construction schedule for the proposed facilities to provide additional service to the EZ Grow Facility?

2. **Reference:** EPCOR Application, page 7

“8. Clearbeach has indicated that it has an excess capacity of natural gas for which it will enter into a System Gas Supply Agreement with ENGLP to supply the additional gas volumes to EZ Grow. This increase in peak demand is referenced in ENGLP’s Gas Supply Plan in EB-2024-0139, filed May 31, 2024.”

Question:

Please confirm that EPCOR will have programs / systems / policies in place to monitor the quality of the gas being provided to the end use customer. Please details of these programs / systems / policies.

3. **Reference:** EPCOR Application, page 9

“17. ENGLP confirms that: no contribution in aid of construction is required; none of the leave-to-construct thresholds in subsection 90(1) of the OEB Act are triggered by the New Pipeline construction; and that Clearbeach is a competent builder and operator. In addition to this CPCN approval, ENGLP and Clearbeach will obtain all requisite approvals required under all applicable laws to construct the New Pipeline and facilitate the transfer of the asset to ENGLP to supply gas to EZ Grow.”

Questions:

- (a) Please confirm that the proposed pipeline will be included in EPCOR’s annual leak survey plan and sign markers will be installed from a damage prevention / emergency contact perspective and to clearly identify the pipeline.
- (b) Does the “transfer of the asset to ENGLP to supply gas to EZ Grow” reference mean that there will be financial compensation given to Clearbreach and the cost of which would be recovered in rates charged by EPCOR to its customers?

4. **Reference:** EPCOR Application, page 10

“19. ENGLP has also included a draft CPCN as Appendix “F”, which includes the following lots and concessions in Norfolk County representing the New Pipeline to the EZ Grow Facility: Concession 7: Lots 2 and 3 (excluding municipal addresses 220 and 230 8th Concession Road); and, Concession 7: North Part of Lot 2.”

Questions:

- (a) Please confirm that the EZ Grow Facility will be the only customer served by the proposed facilities.
- (b) Please provide details of any other permits, environmental screenings/reviews, etc. that EPCOR has or will be acquiring / undertaking related to this application.

5. **Reference:** EPCOR Application, page 8

“12. ENGLP hereby applies to the OEB for a limited CPCN covering the area of the New Pipeline. ENGLP proposes that the OEB follow the same process as in proceeding EB-2021-0238 when issuing a new CPCN for the New Pipeline. In EB-2021-0238, the OEB issued Six Nations a new certificate for the expanded service area within Enbridge’s CPCN territory, which cancelled and superseded Six Nations’ and Enbridge’s prior certificates. A new certificate excluding Six Nations’ new service areas was also granted to Enbridge, which cancelled and superseded Enbridge’s prior certificate.

13. ENGLP proposes that the portions of the 2019 CPCN and 2021 CPCN covering the area for the New Pipeline be superseded and replaced by a new CPCN.”

Questions:

- (a) Please confirm that EPCOR currently only has one CPCN (EB-2017-0108-B1 issued October 17, 2019) in place for areas it is permitted to serve within Norfolk County.
- (b) Please confirm that an amendment to the EB-2017-0108-B1 CPCN would accomplish EPCOR’s objective for his application.
- (c) Please confirm whether and how the proposed additional service area within Norfolk County will impact the EB-2021-0238-E CPCN issued to Six Nations Natural Gas on December 16, 2021, and the EB-2021-0238-H CPCN issued to Enbridge Gas on December 16, 2021.
- (d) Please provide updates to the maps contained in Appendix E titled “EPCOR CFCN Certificate Area - Norfolk Township” and “EPCOR Infrastructure - Norfolk Township” which highlight the area proposed to be added to EPCOR’s CPCN service area in Norfolk County through this application.