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BY EMAIL

December 13, 2024

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 Limited Certificate of Public Convenience and Necessity
for Norfolk County
OEB Staff Interrogatories
EB-2024-0239**

In accordance with Procedural Order No. 1, please find attached the Ontario Energy Board (OEB) staff interrogatories in the above proceeding. The applicant and intervenors have been copied on this filing.

EPCOR Natural Gas Limited Partnership's responses to interrogatories are due by January 7, 2025.

Any questions relating to this letter should be directed to Natalya Plummer at natalya.plummer@oeb.ca or at 416-440-7654. The OEB's toll-free number is 1-888-632-6273.

Yours truly,

Natalya Plummer
Advisor, Natural Gas

Encl.

OEB Staff Interrogatories
EPCOR Natural Gas Limited Partnership
EB-2024-0239

Please note, EPCOR Natural Gas Limited Partnership is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff interrogatories and any other supporting documentation, do not include personal information (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's *Rules of Practice and Procedure*.

OEB STAFF-1

Reference: Application, page 5, para 2 and 5
Application, page 6, paras 6 and 7
Application, page 9, para 16
Application, page 10, para 21

Preamble:

ENGLP is currently providing natural gas service to the EZ Grow Greenhouse Facility. The EZ Grow Greenhouse Facility requires additional gas volumes for the winter growing season. ENGLP states that the most economical and efficient solution from a timing and supply perspective to meet the demand is to construct a new 2.5 km polyethylene pipeline at Lots 2 and 3 (excluding municipal addresses 220 and 230 8th Concession Road) and Concession 7- North Part of Lot 2 in Norfolk County, the area in which ENGLP has requested a certificate

ENGLP states that although the EZ Grow Greenhouse Facility is located within its franchise area and certificate territory, undertaking upgrades to its assets would be much more costly than a new pipeline.

The proposed pipeline would traverse Enbridge Gas's certificate area. ENGLP states that it has no intention of supplying any customers in Enbridge Gas's certificate territory even though the proposed pipeline would traverse Enbridge Gas's certificate territory. ENGLP further states that the certificate is limited to the new pipeline and would not interfere with any of Enbridge Gas's interests within its service territory.

ENGLP submits that Enbridge Gas has advised that it would take several months to evaluate whether it can supply the EZ Grow Greenhouse which is unviable to the EZ Grow Greenhouse's requirements.

Question(s):

- a) Please clarify whether the certificate request is for all of Concession 7- Lot 2 or only the north part of Concession 7- Lot 2.
- b) Please file any communication provided by Enbridge Gas outlining that it does not object to the construction of the proposed pipeline and associated facilities in its certificate area.
- c) To the best of ENGLP's knowledge, please provide the location of the nearest Enbridge Gas distribution pipeline to the proposed pipeline and associated facilities.

OEB STAFF-2

Reference: Application, page 5, para 5
Application, page 6, para 7
Application, page 7, para 8
Application, page 9, para 17

Preamble:

ENGLP states that the EZ Grow Greenhouse facility requires additional volumes of natural gas by November 1, 2024. ENGLP further states that it completed an upgrade on February 14, 2024, for an intermediary amount but to reach the required demand, ENGLP is proposing to supply the required natural gas by using Clearbeach Resources Inc. (Clearbeach Resources Inc.) who will construct the proposed 2.5 km pipeline and then sell the proposed pipeline to ENGLP.

ENGLP states that Clearbeach Resources has an excess capacity of natural gas and that it will enter into a System Gas Supply Agreement with ENGLP to supply the additional gas volumes to the EZ Grow Greenhouse Facility. ENGLP states that the proposed pipeline does not meet the LTC threshold.

Question(s):

- d) Please discuss whether the EZ Grow Greenhouse facility received the additional volumes of natural gas it required by November 1, 2024.
- e) Please describe the anticipated timing for the completion and in-service date of the proposed pipeline.
- f) Please provide the proposed operating pressure of the pipeline and confirm that the length of the proposed pipeline has not changed. If not confirmed, please provide the new proposed length for the pipeline.

- g) Please outline the cost of the proposed pipeline and associated facilities in comparison to ENGLP undertaking upgrades to its assets. Please also discuss whether ENGLP customers will pay for the cost of the proposed pipeline and associated facilities and whether the costs for the proposed pipeline and associated facilities have been approved in another proceeding.
- h) Please provide the details on any cost and timing proposals provided by Enbridge Gas to serve the EZ Grow Greenhouse Facility.

OEB STAFF-3

Reference: Application, page 10

Preamble:

ENGLP has applied for a limited Certificate for Norfolk County. The *Ontario Energy Board Act, 1998* permits the OEB, when making an order, to “impose such conditions as it considers proper.”

Question:

- a) OEB staff has prepared draft conditions of approval, set out below. If ENGLP does not agree to any of the draft conditions of approval noted below, please identify the specific conditions that ENGLP disagrees with and explain why. For conditions in respect of which ENGLP would like to recommend changes, please provide the proposed changes and an explanation of the changes.

EPCOR Natural Gas Limited Partnership (ENGLP)

Application for a Limited Certificate of Public Convenience and Necessity for Norfolk County

DRAFT CONDITIONS OF APPROVAL

1. ENGLP shall give the OEB notice in writing of the:
 - a. Commencement of construction, at least ten days prior to the date construction commences;
 - b. Planned in-service date, at least ten days prior to the date the facilities go into service;
 - c. Date on which construction was completed, no later than 10 days following the

- completion of construction; and
- d. In-service date, no later than 10 days after the facilities go into service.
2. ENGLP shall advise the OEB of any change to the proposed facilities as described in its application and evidence, prior to implementing the change.
 3. ENGLP shall designate one of its employees as project manager who will be responsible for the fulfillment of these conditions. ENGLP shall provide the employee's name and contact information to the OEB. The project manager will be responsible for the fulfillment of the conditions of approval on the site.
 4. The OEB's designated representative for the purpose of these Conditions of Approval shall be the OEB's Manager of Natural Gas.