Ontario Energy Board | Commission de l'énergie de l'Ontario

BY EMAIL

September 9, 2024

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

Dear Ms. Marconi:

Re: Enbridge Inc.
St. Laurent Pipeline Replacement Project
Ontario Energy Board (OEB) Staff Interrogatories
Ontario Energy Board File Number: EB-2024-0200

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.

Yours truly,

Original Signed By

Zora Crnojacki
Senior Advisor, Natural Gas Applications

Encl.

OEB Staff Interrogatories
Enbridge Gas Inc.
EB-2024-0200

Please note, Enbridge Gas Inc. 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*.

ISSUE 1.0: NEED FOR THE PROJECT

1.0 Staff-1 Ref: Application and Evidence, Exhibit B, Tab 1, Schedule 1 Plus Attachments: Project Need

Preamble:

This is Enbridge's second application for leave to construct the St. Laurent Pipeline system (SLP) replacement project. The first application (File No. EB-2020-0293) was denied on May 3, 2022. The OEB found that there was not sufficient evidence to approve the project. Specifically, the OEB found that Enbridge did not demonstrate that SLP system integrity was compromised to the extent that it required replacement.

The OEB asked Enbridge to examine additional alternatives to full replacement such as development and implementation of in-line inspection and maintenance programs using modern technology.

In its Decision and Order, the OEB found:

> …the need for the Project and the alternatives to the Project have not been appropriately assessed. Enbridge has not demonstrated that the pipeline integrity is compromised, and that pipeline replacement is required at this time. The OEB urges Enbridge to thoroughly examine other alternatives such as the development and implementation of an in-line inspection and maintenance program using available modern technology, and propose appropriate action based on its finding as part of its next rebasing application.[1]

Enbridge suggests that, in the current application, the need for the Project is underpinned by the need to mitigate the risks of declining pipeline integrity of the St.

[1] EB-2020-0293 Decision and Order, May 3, 2022, page 3

Laurent Pipeline system that is based on improved, pipeline-specific extensive inspection and quantitative risk assessment. Enbridge states that it followed the OEB's direction in the decision and applied a Targeted Integrity Program which included collection of historical data and pipeline-specific surveys using modern technology. Based on the results of the Targeted Integrity Program, Enbridge conducted sensitivity analysis, and quantitative risk assessment.

Questions:

a) Beyond the use of the Targeted Integrity Program discussed in the current application, please describe any other differences between the current application and the previously denied application. Please comment on issues related to the proposed route, environmental impacts assessment, land matters, public consultation including consultation with the City of Ottawa, indigenous consultation and any other changes compared.

b) In order to present a high-level summary of the integrity assessment project, please provide the integrity assessment project flowchart starting with the Targeted Integrity Program activities ending with the Quantitative Risk Assessment, Reliability Modelling and evaluation of Full Replacement and Extensive Inspection and Repairs as options to mitigate the risks. Please show how the project components relate to each other indicating time sequence, inputs and outputs (i.e. integrity assessment data, benchmarks).

c) Please include a complete list of all references, standards and codes used to assess the SLP integrity.

1.0 Staff-2

Ref: Exhibit B, Tab 1, Schedule 1, paragraph 11, page 5
Exhibit A, Tab 2, Schedule 2, paragraph 9, page 6

Preamble:

The SLP system is a critical component of Enbridge's natural gas distribution network in the National Capital Region. Enbridge stated that approximately 168,000 customers on networks downstream of the SLP system in Ottawa, Ontario and Gatineau, Quebec are served by the SLP and potentially exposed to reliability risk.

The SLP is supplied from a single source, the St. Laurent Control Station, and consists of steel mains primarily installed in 1958 and 1959. It is an integral part of the natural gas network that supplies, directly or indirectly, natural gas to approximately 168,000

customers in the City of Ottawa and in Gatineau, Quebec. Enbridge noted that the SLP system is the main source of supply for Gazifere.

Questions:

a) Please provide approximate number of customers served by the SLP:
   a. in the City of Ottawa
   b. in Gatineau
   c. other service areas of Gazifere

b) What portion of the cost of the Project will be carried by Enbridge's ratepayers and what portion will be carried by Gazifere's ratepayers?

c) Please describe any agreements or other regulatory mechanism to allocate the cost of the Project between Enbridge's ratepayers and Gazifere's ratepayers.

1.0 Staff-3

Ref: Exhibit B, Tab 1, Schedule 1, paragraph 8 and 9 pages 3 and 4, Figure 1. St. Laurent Pipeline Map

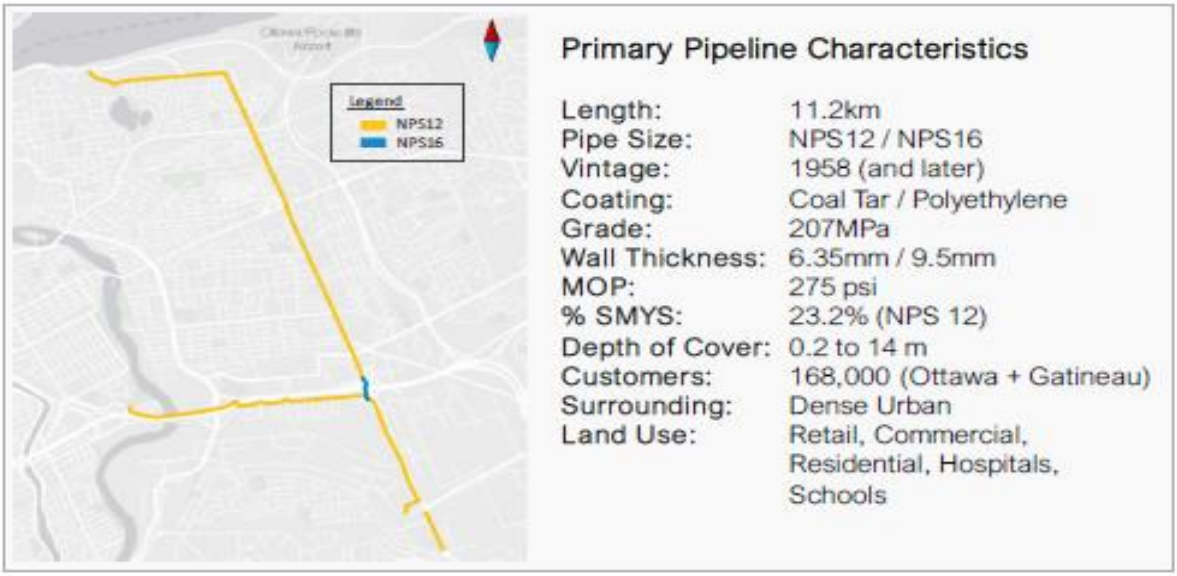
Preamble:

The SLP system is comprised of 10.8 km of NPS 12 steel pipe and 0.4 km of NPS 16 steel pipe. St. Laurent Pipeline system is a one-way feed from the St. Laurent Control Station to the Rockcliffe Station. The pipeline was constructed between 1958 and 1959. It is a coated steel pipe with the following specifications:

i. Wall Thickness = 6.35 mm and 9.5 mm
ii. Coating = Polyethylene (PE) (13%) / Coal Tar (87%)
iii. Grade = 207 MPa

A map of the pipeline system and an overview of its primary characteristics are shown in Figure 1.

Figure 1: St. Laurent Pipeline Map



The new replacement pipelines (total length of approximately 17.6 km) and ancillary facilities are proposed to replace 14.4 km of the existing pipelines along St. Laurent Avenue, Sandridge Road, and Tremblay Road in the City of Ottawa. The existing pipelines are proposed to be abandoned and replaced with approximately:

- 10.0 km of NPS 12 XHP ST;
- 2.5 km of NPS 16 XHP ST;
- 0.3 km of NPS 6 XHP ST;
- 0.9 km of NPS 6 Intermediate Pressure (IP) Polyethylene (PE); and
- 3.9 km of NPS 4 IP PE.

Questions:

a) Enbridge provided that the Specified Minimum Yield Strength (SMYS) for the existing NPS 12 is 23.2%. What is the SMYS for the existing NPS 16 segment?

b) Enbridge replacement pipelines include about 4.8 km of IP PE pipelines. Which sections of the SLP system are proposed to be replaced by these pipelines? In response to the question, please file a map indicating the existing pipelines being replaced by PE IP pipelines and the location of the proposed replacement.

c) What is the SMYS of the existing IP PE pipelines planned to be replaced? Please explain if the need to replace these pipelines is based on their integrity decline. If so, how and when is the decline established or predicted and which repair measures are currently being implemented?

1.0 Staff-4

Ref: Exhibit B, Tab 1, Schedule 1, paragraph 2, page 1, and paragraph 13 and 14, pages 6-7

Preamble:

Beginning in June 2022, following a denial of the previous SLP Replacement application in May 2022, Enbridge commenced a Targeted Integrity Program, a comprehensive assessment of the reliability and condition of the SLP, which included:

- SLP's Operating History data
- Assessment of current condition applying the following methods to collect pipeline-specific data by:
    - i) In-line inspection (ILI)
    - ii) Field excavations
    - iii) Non-Destructive Examinations (NDE)

- Quantitative Risk Assessment
    - a. Risk Modelling
    - b. Reliability Modelling

Question:

Please discuss the rationale to not implement the Targeted Integrity Program prior to May 2022? Please refer to the outcomes of "2018-2027 Asset Management Plan (AMP)" published in 2018.

1.0 Staff-5

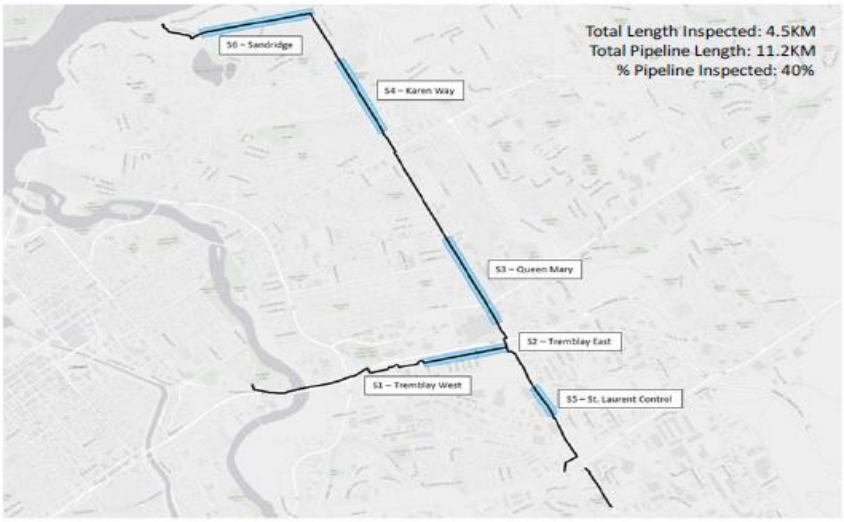
Ref: Exhibit B, Tab 1, Schedule 1, paragraph 14, page 6, Table 1. Inspections and Surveys and Figure 2. Robotic Crawler ILI Extents and Locations

Preamble:

Enbridge noted that robotic crawler ILI and Non-Destructive Examinations provided the "most definitive" results regarding the condition of the existing pipeline.

Data collected by robotic crawler MFL-LDS cover 4.5 km or 40% of the total length of the SLP.

Figure 2: Robotic Crawler ILI Extents and Locations



Questions:

a) Please discuss the reasons for not using ILI and Non-Destructive Examinations prior to June 2022?

b) Referring to the map in Figure 2, please explain the method for selecting the locations for ILI.

c) Please discuss and explain the rationale of using pipeline-specific ILI data along 40% of the SLP length to extrapolate and assess the condition of the entire SLP.

1.0 Staff-6

Ref: Exhibit B, Tab 1, Schedule 1 paragraphs 31-33, pages 16-17, and page 17, Table 3: Integrity Dig Findings

Preamble:

Enbridge conducted Non-Destructive Excavations at 13 locations (including one where NDE assessment was not completed). These locations were at ILI launch sites or ILI driven except for five where operational concerns were determined). A total of 212 anomalies were found (i.e. corrosion, gouging, arc burns welded defects). Enbridge stated that over 100 of the anomalies were significant enough to require pipeline repairs in compliance with Enbridge's Operating Standards and CSA Z662 Oil and Gas Pipeline Systems (CSA Z662-19).

Questions:

a) Please specify the characteristics of the identified anomalies and explain why these require repair under:

   i) Enbridge's operating standards
   ii) CSA Z662-19

b) As part of the response please provide excerpts of sections and clauses of Enbridge's Operating Standards and CSA Z662-19 which call for the repairs of these anomalies.

1.0 Staff-7

Ref: Exhibit B, Tab 1, Schedule 1, paragraph 43, pages 26 and 27, Table 5: Integrity Related Repairs

Preamble:

Enbridge stated that "numerous" pipeline repairs and replacements were required based on the results of field inspections and findings of the Targeted Integrity Program. Enbridge filed a summary of the repairs indicating the repair type and targeted defects (see Table 5: Integrity Related Repairs). Enbridge noted that 162-meter segment at dig at Tremblay Road was abandoned and replaced in November 2022. In that instance, ILI detected metal loss of the pipeline wall which was equal to or exceeded 80% of wall thickness.

Questions:

a) Please discuss the significance of the metal loss equal to or greater than 80%?

b) What was the continuous length of the metal loss equal to or greater than 80% along the replaced segment of the pipeline?

c) Please specify any other segments examined either by ILI or/and by a dig that has the metal loss of similar depth and length as the replaced segment.

d) Please refer to longitudinal corrosion and depth of wall loss that represent the risk of pipeline rupture for a pipeline that operates at the same SMYS as SLP system? Please discuss this in terms of any repair requirements set by CSA Z662-19 or other standards, operating rules or regulations.

1.0 Staff-8

Ref: Exhibit B, Tab 1, Schedule 1, paragraph 46, pages 28-29, Table 6: Leak/Repair Summary

Preamble:

Enbridge reported ten leaks which were repaired between 2007 and 2023. Nine of the leaks were at valves, fittings and service connections which Enbridge assessed represent no potential hazard. One leak was on a pipeline main and Enbridge assigned level seven to the potential hazard of this fault. Enbridge further noted that in urban environments hard surfaces and buildings which represents a higher risk of a gas leaks in confined spaces and increased risk of a build up to explosive levels.

Questions:

a) Please comment on the cause of leaks on a pipeline versus the leaks at valves/fittings and service connection.

b) When was the leak, which was assigned level seven, on the pipeline identified?

c) Considering that Enbridge detected only ten leaks from 2007 to 2023, what is the probability of leaks occurring in the future? What is the correlation between the probability of leaks and high level of safety and reliability risks on the SLP?

d) Please discuss historical occurrences of gas explosions or similar catastrophic events that occurred in the SLP system since 1958 when it first was in service?

1.0 Staff-9

Ref: Exhibit B, Tab 1, Schedule 1, paragraph c), page 30 and Figures 15 and 16: Pipeline Failure on NPS 20 Distribution Main Operating at 175 psi

Preamble:

The Maximum Operating Pressure of the SLP system is 1900 kPa (275 psi) which is above the lower pressure pipelines that operate around 345 kPa (50 psi). Figures 15 and 16 show photos of pipeline failure on NPS 20 pipeline operating at 175 psi.

Questions:

a) Please indicate the SMYS of the pipeline shown as an example of pipeline failure of NPS 20 and operating at 175 psi?

b) Describe the direct cause of the pipeline failure and of road surface collapse in the example provided in Figures 15 and 16.

c) What time of the year and which year did the failure occur? Was there a loss of service, and if so, for how many customers and how long did it last?

1.0 Staff-10

Ref: Exhibit B, Tab 1, Schedule 1, paragraphs 49-54, pages 33-37, Figure 17: SLP Reliability versus Targets (LLS and ULS targets combined)

Preamble:

Enbridge concluded in its Quantitative Risk Analysis (QRA) that 8.8.km of the 11.2 km SLP pipeline (79%) fail the acceptable CSA Z662-Annex O reliability thresholds. Enbridge noted that the segments that fail the Leakage Limit State (LLS) and Ultimate Limit State (ULS) along the SLP pipeline are non-continuous. The location of these segments is shown red in Figure 17 below.

Figure 17: SLP Reliability vs. Targets (LLS and ULS targets combined)

Enbridge applied three sets of evaluation criteria to determine if immediate interventions or risk mitigation measures are required for continued safe operation of the SLP:

1. CSA Z662-19 Annex O Reliability Targets: LLS (small leaks) and ULS (large leaks and ruptures).

2. Pipeline and Hazardous Materials Administration (PHMSA) USA incident database for distribution pipelines. Referring to the PHMSA Enbridge applied a US CFR 191.3 definition of significant incident. The PHMSA defines a significant incident as incident resulting in fatalities or hospitalization or incident where operator incur costs of $129,300 USD (2022 dollars).

3. Enbridge Standard Operational Risk Assessment Matrix (ORAM) which maps Health and Safety, Financial and Operational Reliability risks related to the condition of SLP.

Questions:

a) Please provide a relevant excerpt from CSA Z662-19: Annex O, Reliability Thresholds.

b) In the Canadian regulatory context, referring to CSA Z662-19, what are the SMYS values to define transmission pipeline versus distribution pipelines for the purpose of integrity monitoring and mitigation of risks? Which clauses of CSA Z662-19 apply directly to the pipeline of the same operational design as SLP?

c) Considering SMYS of the SLP what are the criteria that justify applying US PHMSA rates of significant incidents to assess the risk of incidents on the SLP?

d) Please define and describe benchmarks and targets of Health and Safety, Financial, and Operational Reliability Risks used in the ORAM for risk assessment of the SLP.

1.0 Staff -11

Ref: Exhibit D, Tab 1, Schedule 1, page 9

Preamble:

According to Enbridge's proposed construction schedule Project construction is expected to take approximately 21 months, starting in April 2025. The SLP is expected to be in service by December 2026.

Table 1
Overall Proposed Construction Schedule

Expected LTC Approval	January 2025
Receipt of Permits and Approvals	April 2025
Commence Construction	April 2025
Expected In-Service	December 2026
Completion of Construction	December 2026
Completion of Site Restoration	October 2027
Final Inspection	March 2028

Questions:

a) How is Enbridge planning to proceed with maintaining the safe and reliable service on the SLP, in the event of a delay of the construction commencement due to delays in permits and approvals?

b) If the OEB does not grant its approval for a Full Replacement of the SLP, how is Enbridge planning to maintain safe and reliable service on the SLP?

1.0 Staff-12

Ref: Exhibit D, Tab 1, Schedule 1

Preamble:

On April 29, 2024, Enbridge filed with the Technical Standards and Safety Authority (TSSA) an application for the approval of the design of the proposed facilities.

Questions:

a) Please provide any update on the review of that application by TSSA. Please file a correspondence between Enbridge and TSSA and any relevant documentation to date regarding the TSSA's review of the Project.

b) If TSSA approval has not yet been received, when does Enbridge anticipate receiving it?

1.0 Staff-13

Ref: Exhibit B, Tab 3, Schedule 1, Energy Transition, pages 10-17, EB-2024-0111, Exhibit JT 1.19

Preamble:

Enbridge describes its probabilistic analysis of customer disconnection, as a proxy for the useful life of the Project. Enbridge defines an asset's useful life as the lesser of the asset's depreciable life, or the length of time an asset could be needed to supply gas. For the latter, Enbridge assumes that 100% disconnection is required, noting that it cannot choose to discontinue gas services to customers along its pipeline system, even if only one customer remains.

Questions:

a) Does Enbridge believe that some level of disconnection (or reduction in demand) less than 100% (e.g., a 75% reduction in customers or in demand, relative to the demand level the asset was originally sized to serve) could also be used to estimate an asset's expected useful life, as system pruning may be a preferred approach once an asset reaches this level of underutilization? Why or why not?

1.0 Staff-14

Ref: Exhibit B, Tab 3, Schedule 1, Energy Transition, page 13

Preamble:

Enbridge describes its probabilistic analysis of customer disconnection, as a proxy for the useful life of the Project. Enbridge uses data from the Home Energy Rebate Plus (HER+) program to develop a lower bound for the probability of customer disconnection (1%).

Questions:

a) Enbridge notes that the disconnection probability was based on customers that participated in HER+ from Jan 1, 2023, to March 22, 2024. At what date was the customer's connection status assessed, and does Enbridge intend to continue tracking the connection status of these participants into the future, to determine if the disconnection percentage increases over time?

b) Does the HER+ data allow Enbridge to determine the disconnection percentage for the subset of HER+ heat pump purchasers who installed a cold-climate heat pump? If so, please provide.

1.0 Staff-15

Ref: Exhibit B, Tab 3, Schedule 1, Energy Transition, pages 21, 27-28

Preamble:

Enbridge describes the electrification assumptions for Ottawa regarding space heating in the electricity Integrated Regional Resource Plan (IRRP) process, noting that the IRRP reference scenario electricity demand forecast, "Moderate B", assumes 76% of space heating will be provided by electricity in 2050.

Questions:

Please clarify why Enbridge believes that the Ottawa IRRP's reference case "Moderate B" is "an unlikely and highly aggressive option" (p. 28). To the best of Enbridge's knowledge, why have Hydro Ottawa and the IESO adopted this scenario as the reference scenario if it is unlikely to occur?

ISSUE 2:0: PROJECT ALTERNATIVES

2.0 Staff-16

Ref: Exhibit C, Tab 1, Schedule 1, pages 3, Table 1: Initial Assessment of Risk Mitigation Alternatives

Preamble:

Enbridge initially evaluated six alternatives and selected two for further evaluation:

A. Full Replacement
B. Extensive Inspection and Repair

These two alternatives were comparatively assessed based on: approximate reduction of Health and Safety risk, Operational Reliability risk, and Financial risks (i.e., cost of property damage, emergency repair, restoring service to customers). Considerations Enbridge applied to comparative assessment of risk mitigation alternatives - Full Replacement vs Extensive Inspection and Repair are:

i. Public Safety and Residual Risks
ii. Public Disruption and Nuisance
iii. Financial Assessment (NPV)
iv. Uncertainty of Plan and Outcomes
v. Other Considerations (i.e., long-term uncertainty impacts, potential for using the pipeline for future low-carbon initiatives etc.)

Question:

Please rank the weight (i.e., importance) of the five sets of criteria applied to evaluate Full Replacement versus Extensive Inspection and Repair risk mitigation alternatives.

2.0 Staff-17

Ref: Exhibit C, Tab 1, Schedule 1, page 8, Table 2: Work Requirements; Exhibit C. Tab 1, Schedule 1, page 19, Table 7: Summary of NPVs for Alternative A and B with Various Useful Lives; Exhibit B, Tab 1, page 8

Preamble:

Enbridge describes the work requirements associated with Alternative A (Full Replacement) and Alternative B (Extensive Inspection and Repair), one of which is of continued and expanded use of the Crawler in-line inspection tool and discusses its financial assessment (net present value or NPV assessment) of Alternative A and Alternative B under three different time horizons.

To address risk of stranded assets within scenarios of energy and electrification transition, Enbridge compared NPVs under three assumptions for useful life of the SLP: Case A (63 years), Case B (42 years) and Case C (31 years). Enbridge noted that abandonment costs were not included in the NPV analysis, as both alternatives would require a similar level of pipeline abandonment and incur comparable costs.

Table 7
Summary of NPVs for Alternative A and B with Various Useful Lives

NPV ($ millions)	A – Full Replacement	B - Extensive Inspection and Repair	$ Difference (A – B)
Case A (63 years)	$(134)	$(253)	+$119
Case B (42 years)	$(134)	$(179)	+$45
Case C (31 years)	$(134)	$(140)	+$6

Questions:

a) Please provide the NPV analyses that underpin this discussion.

b) Please describe the key assumptions and rationale as to the costs used in the NPV analysis (e.g., the assumed costs associated with the work requirements described in Table 2: Works Requirements).

c) What are the costs that were incurred to date using the Crawler in-line inspection tool to capture condition data on 4.5 km (40%) of the total pipeline system?

d) Why does Alternative B entail inspection of 70% of the total pipeline system using the Crawler in-line inspection tool, and not 100% (e.g., are there technical challenges associated with inspecting the remaining 30% of the system, are these segments determined to be low-risk, etc.)?

2.0 Staff-18

Ref: Exhibit C, Tab 1, Schedule 1, page 20

Preamble:

Enbridge states that Alternative B (Extensive Inspection and Repair), by retaining original sections of the pipeline, could significantly constrain future low-carbon initiatives, like hydrogen blending, in comparison with Alternative A (full replacement).

Question:

What level of hydrogen blending does Enbridge understand to be technically feasible under Alternative A (full replacement)?

2.0 Staff-19

Ref: Exhibit C, Tab 1, Schedule 1, pages 21-25; EB-2022-0200 – 2024 Rates Application, Response to City of Ottawa Letter of Comment (Letter of July 27, 2023)

Preamble:

Enbridge describes its consideration of non-facility alternatives to the Project, including Integrated Resource Planning alternatives (IRPAs).

Previously, in its July 27, 2023, response to a City of Ottawa letter that noted concerns with Enbridge's consideration of IRPAs, Enbridge indicated that "the Better Homes Loan Program was and will be considered as an IRPA in relation to the St. Laurent project, and it may also be considered as an IRPA in conjunction with future infrastructure needs being considered in the City of Ottawa".

Questions:

a) Please describe the intent of Enbridge's statement in this letter (e.g., was Enbridge considering supplemental funding for incentives or promotion of these programs?). How was the Better Homes Loan Program (or other City of Ottawa programs) considered as part of Enbridge's consideration of IRPAs in relation to the Project?

ISSUE 4:0: ENVIRONMENTAL IMPACTS

4.0 Staff-20

Ref: Exhibit F, Tab 1, Schedule 1, Plus Attachments; Exhibit F, Tab 1, Schedule 1, Attachment 3, Appendix D

Preamble:

Enbridge retained Dillon Consulting Limited (Dillon) to complete an Environmental Report (ER), which assessed the existing bio-physical and socio-economic environment in the study area, the alternative routes, the proposed preferred route, public consultation program, impact assessment, and proposed mitigation measures to minimize the impacts of the project. The project ER was finalized in June 2020 and ER Amendment 1 was completed in November 2020.

ER Amendment 2 was completed in January 2024 and provides an additional assessment on the additional segments added to the proposed pipeline routes.

The ER amendment was submitted to the Ontario Pipeline Coordinating Committee (OPCC) and other stakeholders for review and comment on October 27, 2023.

The description of consultation activity with the federal National Capital Commission (NCC) provided in Appendix D of the ER notes that federal approval is required for the project and that a Federal Land Use, Design and Transaction Approval (FLUDTA) level 1 or 2 application is required prior to a decision and a federal determination under the Impact Assessment Act (IAA). Enbridge notes that the IAA and FLUDTA have been accepted.

Questions:

a) Please file an update of the comments provided in Appendix D of ER, (summarized in tabular format) that Enbridge has received since March 31, 2024. Please include the supporting documentation, (i.e., emails and other correspondence) that is referenced. Please include the dates of communication, the issues and concerns identified by the parties, as well as Enbridge's responses and actions to address these issues and concerns.

b) Please provide an update on whether a federal determination has made for the Project under the IAA. If a determination has not yet been made, what is the anticipated timeline to receive the determination under the IAA?

c) Please provide an update on whether the consultation activity with a member of the public described line item 59.1 of the stakeholder consultation log provided in Appendix D of the Environmental Report has been resolved.

4.0 Staff-21

Ref: Exhibit D, Tab 1, Schedule 1, paragraph 9, page 9

Preamble:

Enbridge states that it is looking at site options for replacing the Rockliffe Control Station and that the exact route for the pipeline at Rockliffe Park is subject to change pending the outcome of the site selection process for the replacement station. Enbridge also states that at the time of filing, the locations under consideration fall within the study area of the Environmental Report.

Questions:

a) Please provide an update on the site selection process for the replacement station at Rockliffe Park and whether there have been any changes to the proposed pipeline route.

b) If there have been changes to the proposed pipeline route at Rockliffe Park, please describe those proposed changes and if any additional easements or approvals are required. Please also provide updated route maps.

c) Please provide further details on the length of the segment of the proposed pipeline at Rockcliffe Park that is subject to change pending the outcome of the site selection process for the replacement station.

d) Please confirm whether the study area of the Environmental Report includes any proposed changes to the proposed pipeline route?

   If the study area of the Environmental Report does not include any proposed changes to the segment of the pipeline at Rockcliffe Park, please explain whether an additional Environmental Report amendment will be made and the timeline for submission of the Environmental Report Amendment to the OPPC, Algonquins of Ontario, Algonquins of Pikwakanagan First Nation and Mohawks of Akwesasne and other stakeholders for review and comment.

e) Please discuss whether any other assessments (i.e., archeological assessment or cultural heritage assessment) are required for any potential proposed changes to the segment of the proposed pipeline at Rockcliffe Park. If other assessments are required, please provide a timeline for when those assessments are expected to be compete.

ISSUE 5:0: ROUTE MAP AND FORM OF LANDOWNER AGREEMENTS

5.0 Staff-22

Ref: Exhibit G, Tab 1, Schedule 1, page 1

Preamble:

The proposed route for the Project follows the public road allowance for most of the proposed pipeline. Enbridge notes that both permanent and temporary easements are required for the Project.

Enbridge also states that an easement for segments of the existing pipeline through Rockcliffe Park on lands owned by the National Capital Commission has expired and that Enbridge will engage with the National Capital Commission to renegotiate any required easement for the preferred pipeline route prior to replacement.

Questions:

a) Please provide an update on the status and prospect of land negotiations where permanent and temporary easements are required. Please include any concerns raised by landowners and Enbridge's responses.

b) What is the status and prospect of negotiations with the National Capital Commission?

c) Please discuss any expected delays with respect to obtaining the required land rights for the Project and its impact to the construction start and in-service dates.

5.0 Staff-23

Ref: Exhibit D, Tab 1, Schedule 1, page 9, paragraph 9,

Preamble:

Enbridge states the exact route for the pipeline at Rockliffe Park is subject to change pending the outcome of the site selection process for the replacement station.

Questions:

a) Are there any additional land rights that Enbridge may require for the new location of the site of Rockliffe Park station? If so, please identify the type of rights and the owners of the land where the rights are potentially needed.

b) Has Enbridge initiated discussions with the landowners of properties where additional rights may be required? What is anticipated timeline for concluding these negotiations?

ISSUE 6:0: INDIGENOUS CONSULTATION

6.0 Staff-24

Ref: Exhibit H, Tab 1, Schedule 1, Attachment 1

Preamble:

Enbridge provided a project description to Ministry of Energy and Electrification (Ministry) on November 7, 2023. The Ministry's delegation letter on December 21, 2023,

identified three Indigenous communities that Enbridge should consult in relation to the project:

- Algonquins of Ontario
- Algonquins of Pikwakanagan First Nation
- Mohawks of Akwesasne

Enbridge notes that the Algonquins of Pikwakanagan First Nation is one of the communities that comprises the Algonquins of Ontario and should be notified separately (in addition to notifying Algonquins of Ontario) for consultation and engagement purposes. The application evidence includes consultation records and correspondence logs.

Questions:

a) Please update the logs on Indigenous consultation activities since April 8, 2024. Please summarize any issues and concerns Algonquins of Ontario, Algonquins of Pikwakanagan First Nation, and Mohawks of Akwesasne and have raised since April 8, 2024.

b) If any issues were raised, please describe Enbridge's plans, actions, and commitments to address these concerns and resolve outstanding issues.

c) Please update the evidence with any correspondence between the Ministry and Enbridge regarding the Ministry's review of Enbridge's Indigenous consultation activities since the application was filed.

ISSUE 7:0: CONDITIONS OF APPROVAL

7.0 Staff-25

Ref: Exhibit I, Tab 1, Schedule 1

Preamble:

Enbridge has applied for leave to construct facilities under section 90(1) of the OEB Act.

The OEB's standard conditions of approval for section 90 applications are provided below.

a) Please comment on the standard conditions of approval. If Enbridge does not agree with any of the standard conditions of approval, please identify the specific conditions that Enbridge disagrees with. Please specify any proposed changes,

amendments or additional conditions to the standard conditions. Explain the rationale for any proposed changes or amendments.

Leave to Construct Application under Section 90 of the OEB Act

Enbridge Inc.
EB-2024-0200
DRAFT
Standard Conditions of Approval

1. Enbridge Inc. shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in EB-2024-0200 and these Conditions of Approval.

2. (a) Authorization for leave to construct shall terminate 12 months after the decision is issued unless construction has commenced prior to that date.
   (b) Enbridge Inc. shall give the OEB notice in writing:
   i. of the commencement of construction, at least 10 days prior to the date construction commences
   ii. of the planned in-service date, at least 10 days prior to the date the facilities go into service
   iii. of the date on which construction was completed, no later than 10 days following the completion of construction
   iv. of the in-service date, no later than 10 days after the facilities go into service

3. Enbridge Inc. shall obtain all necessary approvals, permits, licences, certificates, agreements and rights required to construct, operate and maintain the Project.

4. Enbridge Inc. shall implement all the recommendations of the Environmental Report filed in the proceeding, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.

5. Enbridge Inc. shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Enbridge Inc. shall not make any such change without prior notice to and written approval of the OEB. In the event of an emergency, the OEB shall be informed immediately after the fact.

6. Concurrent with the final monitoring report referred to in Condition 7(b), Enbridge Inc. shall file a Post Construction Financial Report, which shall provide a variance analysis of project cost, schedule and scope compared to the estimates filed in this proceeding, including the extent to which the project contingency was utilized. Enbridge Inc. shall also file a copy of the Post Construction Financial

Report in the proceeding where the actual capital costs of the project are proposed to be included in rate base or any proceeding where Enbridge Inc. proposes to start collecting revenues associated with the Project, whichever is earlier. Both during and after construction, Enbridge Inc. shall monitor the impacts of construction, and shall file with the OEB one electronic (searchable PDF) version of each of the following reports:

a) A post construction report, within three months of the in-service date, which shall:
   i. provide a certification, by a senior executive of the company, of Enbridge Inc. adherence to Condition 1
   ii. describe any impacts and outstanding concerns identified during construction
   iii. describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction
   iv. include a log of all complaints received by Enbridge Inc., including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions
   v. provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licenses, and certificates required to construct, operate, and maintain the proposed project

b) A final monitoring report, no later than fifteen months after the in-service date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:
   i. provide a certification, by a senior executive of the company, of Enbridge Inc. adherence to Condition 4
   ii. describe the condition of any rehabilitated land
   iii. describe the effectiveness of any actions taken to prevent or mitigate any identified impacts of construction
   iv. include the results of analyses and monitoring programs and any recommendations arising therefrom
   v. include a log of all complaints received by Enbridge Inc., including the date/time the complaint was received; a description of the complaint; any actions taken to address the complaint; and the rationale for taking such actions

7. Enbridge Inc. shall designate one of their employees as project manager who will be the point of contact for these conditions and shall provide the employee's name and contact information to the OEB and to all affected landowners and shall clearly post the project manager's contact information in a prominent place at the construction site.