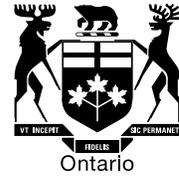


**Ontario Energy
Board**
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto ON M4P 1E4
Telephone: 416- 481-1967
Facsimile: 416- 440-7656
Toll free: 1-888-632-6273

**Commission de l'énergie
de l'Ontario**
C.P. 2319
27e étage
2300, rue Yonge
Toronto ON M4P 1E4
Téléphone: 416- 481-1967
Télécopieur: 416- 440-7656
Numéro sans frais: 1-888-632-6273



BY E-MAIL

August 29, 2018

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
BoardSec@oeb.ca

Dear Ms. Walli:

**Re: OEB Staff Interrogatories
Enbridge Gas Distribution Inc.
Liberty Village Pipeline Project
OEB File No. EB-2018-0096**

Please accept OEB staff's interrogatories to the applicant in this proceeding.

Yours truly,

Original signed by

Ritchie Murray
Project Advisor

Cc (by email):

Andrew Mandyam egdregulatoryproceedings@enbridge.com
Guri Pannu guri.pannu@enbridge.com

**ENBRIDGE GAS DISTRIBUTION INC.
LIBERTY VILLAGE PIPELINE PROJECT LEAVE TO CONSTRUCT
EB-2018-0096**

OEB STAFF INTERROGATORIES

Interrogatory # 1

Ref: Pre-filed Evidence, page 1

Preamble:

Enbridge Gas Distribution Inc. (Enbridge) requests leave to construct a total of approximately 1.2 kilometers nominal pipe size (NPS) 4, 6 and 8-inch natural gas pipeline in the City of Toronto.

Questions:

1. Please provide a reference number for the applicable Municipal Franchise Agreement(s).
2. Please provide a reference number for the applicable certificate(s) of public convenience and necessity.

Interrogatory # 2

Ref: Exhibit A, Tab 1, Schedule 1, page 2
Exhibit C, Tab 1, Schedule 1, page 1

Preamble:

In Exhibit A, the first section (reinforcement section) of pipeline is described as being 900 metres long. In Exhibit C, the first section (reinforcement section) of pipeline is described as being 870 metres long.

Question:

Please explain the reason for the difference in these two lengths.

Interrogatory # 3

Ref: Exhibit F, Tab 1, Schedule 1, page 1
Exhibit F, Tab 1, Schedule 3, Attachments 1-3

Preamble:

According to section 97 of the Ontario Energy Board Act, 1998 (OEB Act), “In an application under section 90, 91 or 92, leave to construct shall not be granted until the applicant satisfies the Board that it has offered or will offer to each owner of land affected by the approved route or location an agreement in a form approved by the Board.”

Enbridge states that the preferred pipeline route is entirely located within the road allowance. Nonetheless, Enbridge filed three forms of agreement it would offer to land owners if required.

Question:

Have these forms of agreement been previously approved by the Ontario Energy Board (OEB); if so, in which proceeding(s)?

Interrogatory # 4

Ref: Exhibit C, Tab 1, Schedule 3, page 1

Preamble:

The amended Environmental Report was submitted to the Ontario Pipeline Coordination Committee (OPCC) on June 13, 2018. At the time of submission of the updated Application, no comments had been received from the OPCC. Enbridge will update the OEB regarding the OPCC review process of the ER should further information become available.

Question:

Please file an update on the comments (in tabular format) that Enbridge has received as part of the OPCC review. 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.

Interrogatory # 5

Ref: Exhibit C, Tab 1, Schedule 4, page 1

Preamble:

A Stage 1 Archaeological Assessment was completed and submitted to the Ministry of Tourism, Culture, and Sport (MTCS) for review. At the time of submission of the updated Application, no comments had been received from the MTCS.

Questions:

1. What is the status of MTCS' review of the Stage 1 Archaeological Assessment?
2. Please provide copies of any correspondence Enbridge has received from MTCS since providing the Stage 1 Archaeological Assessment for review.

Interrogatory # 6

Ref: Exhibit D, Tab 2, Schedule 1, page 1
Exhibit E, Tab 1, Schedule 1, page 2

Preamble:

The estimated Labour and Construction Cost is approximately \$2.8 million representing approximately 95% of the project sub-total (i.e., the project cost less contingency and interest during construction). There is a 25% contingency applied to the project sub-total. The Profitability Index (PI) of the project is 1.0.

Questions:

1. Please explain how the estimate for Labour and Construction Cost was determined.
2. Please explain the need for a 25% contingency.
3. Please compare the total capital cost of this project to one or more comparable projects completed by Enbridge in the last five years.

Interrogatory # 7

Ref: Pre-filed Evidence, page 1

Preamble:

Enbridge applied for leave to construct facilities under section 90 of the OEB Act.

Question:

OEB staff has prepared the draft Conditions of Approval set out on the following page. If Enbridge does not agree to any of the draft conditions of approval noted below, please identify the specific conditions that Enbridge disagrees with and explain why.

For conditions in respect of which Enbridge would like to recommend changes, please provide the proposed changes.

Draft
Leave to Construct Conditions of Approval
Application under Section 90 of the OEB Act
Enbridge Gas Distribution Inc.
EB-2018-0096

1. Enbridge Gas Distribution Inc. (Enbridge) shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in EB-2018-0096 and these Conditions of Approval.
2. (a) Authorization for leave to construct shall terminate 18 months after the decision is issued, unless construction has commenced prior to that date.

(b) Enbridge shall give the OEB notice in writing:
 - i. Of the commencement of construction, at least ten days prior to the date construction commences
 - ii. Of the planned in-service date, at least ten 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 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.
4. Enbridge shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Enbridge 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.
5. Concurrent with the final monitoring report referred to in Condition 6(b), Enbridge shall file a Post Construction Financial Report, which shall indicate the actual capital costs of the project and shall provide an explanation for any significant variances from the cost estimates filed in this proceeding. Enbridge 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 proposes to start collecting revenues associated with the project, whichever is earlier.

6. Both during and after construction, Enbridge shall monitor the impacts of construction, and shall file with the OEB one paper copy and 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's 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, 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, licences, 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's adherence to Condition 3
 - 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, 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