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VIA EMAIL, RESS and COURIER

November 1, 2019

Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Board Secretary:

**Re: EB-2018-0108 – Enbridge Gas Inc. (“Enbridge Gas”)
Don River Replacement Project
Response to Ontario Energy Board (“the Board”) Questions on Request to
Vary No. 1**

On October 15, 2019, Enbridge Gas submitted a Request to Vary Form for the Don River Replacement Project (“the Project”). The Request to Vary involved a change to the schedule for the completion of the tie-ins and therefore the in-service date of the project.

Subsequently on October 24, 2019 Enbridge Gas received a letter from the Board requesting additional information such that a decision can be made on Enbridge Gas’s Request to Vary. Enbridge Gas’s responses to the Board’s questions are below.

1. *An explanation of the operational risks, network constraints, and costs associated with performing the by-pass option*

Enbridge Gas evaluated the operational risks and network constraints associated with constructing a bypass during the winter months in order to attempt to complete the pipeline tie-ins in 2019. The primary risks include: challenges with inserting and obtaining a gas stop due to high flow conditions, potential damage to the bypass due to limited work space, potential third-party damage due to additional fittings being added to the NPS 30 main, potential for resource constraints around the holiday season and the potential for significant customer loss during the heating season should an outage occur on the line while the bypass option is being executed.

Consideration and planning for the construction of the bypass was always within the project scope as an alternative tie-in method, if the planned maintenance shut-down timing could not be met in the original project schedule. The bypass option does not result in significant incremental costs to the overall project. The additional costs would be covered by the project contingency.

2. *An explanation of how Enbridge Gas will mitigate the risks of using the Utility Bridge for an additional 8 months, including how Enbridge Gas will reduce the impact of any outages for customers should the Bridge fail*

Enbridge Gas will not be using the Utility Bridge for an additional eight months. Enbridge was delayed in starting construction of the new NPS 30 pipeline due to permitting delays. In the original plan there were two options to tie-in the pipe: (1) to tie-in during the planned maintenance shut-down of a large volume customer, and (2) to use a bypass if the planned maintenance option was missed in Fall 2019. The permit delays have affected the entire project schedule including the timing of when the pipeline can be tied in. As a result, the earliest that the tie-ins could occur, if the bypass option is utilized, would be December 2019 with completion in Q1 2020. This option was evaluated and eliminated for the reasons discussed above which included consideration to reduce the risk of any customer outages. Therefore, the existing NPS 30 pipeline on the Utility Bridge will be in-service for up to an additional three months. Using the Utility Bridge for up to an additional three months does not outweigh the operational risks and network constraints associated with the bypass option as discussed above.

It is important to note that this Request to Vary does not impact the timing of the Utility Bridge removal which is still planned to commence in December 2021.

3. *A comparison of the risks associated with performing the by-pass option versus the risks associated with prolonged use of the Utility Bridge, including quantitative analysis*

As explained above, the tie-in during the large volume customer's planned maintenance shut down in April 2020 will result in the Utility Bridge being used for up to an additional three months. Due to the risks associated with the bypass option as discussed above, the bypass option is not preferred.

4. *A schedule for the by-pass option*

Due to the permitting delays, the bypass option would be executed starting mid-December 2019 with completion in Q1 2020.

Please contact me if you have any questions.

Yours truly,

(Original Signed)

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