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November 13, 2019

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto ON
M4P 1E4

Dear Ms. Long,

**RE: EB-2019-0172 Enbridge Windsor Pipeline LTC
Energy Probe Submission on FRPO's Request for Additional Discovery**

In Procedural Order No.2 the OEB ordered that OEB staff, Enbridge Gas and intervenors file written submissions on the merits of FRPO's request for additional discovery with the OEB and serve them on all parties by November 14, 2019. The following is the submission of Energy Probe.

Enbridge Gas applied for a leave to construct order from the OEB for approximately 64 km of NPS 6 gas pipeline, to replace a section of the existing Windsor NPS 10 pipeline and short sections of NPS 8 pipeline located in the Municipality of Chatham-Kent and the County of Essex.

The need for the project according to the evidence is the existence of multiple integrity and depth of cover issues and the age of the pipeline some of which was installed in the 1930s, 1940s and 1950s. There is very little evidence on the record that the OEB can rely on to support that claim by Enbridge Gas. For example, there is no Integrity Report from an independent expert. What evidence is provided is of a summary nature.

There is a reference to a "history of leakage" but no details are provided as to the number of leaks and their frequency.

There is a mention of the "depth of cover issues" with the only explanation that there are "sections that have poor depth of cover with less than 0.6m" but no information about how many sections and their location. Some information is provided in response to an interrogatory by Board Staff. It is disclosed that there are only 19 km of pipe at the depth of cover of less than

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0.6m and that there 23 locations with exposed pipe. The Board still does not know if these 19km are concentrated in a particular section or are throughout the entire length of the existing pipeline.

There is a statement that “portions of the older vintage pipe are not weldable”. There is no information about which portions and the material issues with them.

There is a statement that “sections of this pipeline are not located in easement”. No details are provided regarding the length of the sections or their location.

There is a mention of “inoperable mainline valves”. No details are provided.

Since integrity is the only justification for this project, Energy Probe believes that there is insufficient evidence on the record for the OEB to approve it.

In addition to the lack of evidence on integrity, there is also insufficient evidence on alternatives as FRPO pointed out in its letter.

Accordingly, Energy Probe supports FRPO’s request for a Technical Conference.

Respectfully submitted on behalf of Energy Probe.

Original signed by

Tom Ladanyi
Consultant to Energy Probe