

INFORMATION REQUESTS OF  
ENBRIDGE GAS DISTRIBUTION INC. ("ENBRIDGE") FOR  
HUNTER'S GREEN RATE PAYERS ASSOCIATION ("HGRA")

Interrogatory #1

Reference: Submission of Evidence by Harten Consulting, ("Harten") Page 7

*"Dewatering may require a permit under sections 34 and 98 of the Ontario Water Resources Act."*

Section 98 of the Ontario Water Resources Act is provided below.

98. (1) No person shall hinder or obstruct any provincial officer or any employee in or agent of the Ministry or the Agency in the performance of his or her duties under this Act.

(2) No person shall orally, in writing or electronically, give or submit false or misleading information in any statement, document or data, to any provincial officer, the Minister, the Ministry or the Agency, any employee in or agent of the Ministry or the Agency, or any person involved in carrying out a program of the Ministry or the Agency in respect of any matter related to this Act or the regulations.

(3) No person shall include false or misleading information in any document or data required to be created, stored or submitted under this Act.

(4) No person shall refuse to furnish any provincial officer, the Minister, the Ministry, the Agency or any employee in or agent of the Ministry or the Agency with information required for the purposes of this Act and the regulations.

Question:

Is the reference to section 98 correct? If not, what is the proper reference?

Interrogatory #2

Reference: Harten, Exhibit S

The article references the fact the pipe was installed at great depth. Enbridge understands the sewer pipe was installed at depths of up to 50 metres using the

tunnelling construction method. Further, Enbridge understands the diameter of the pipe is up to 3.5 metres in diameter.

Question:

Can HGRA confirm the following information in respect of the project that was referenced, namely:

- a) Please confirm the tunnelling method of construction was used for installation of the pipe. If Enbridge's information is not correct, please provide method of construction.
- b) Please confirm that Enbridge's understanding of the depth of construction is correct. If Enbridge's information is not correct, please provide the depth of construction.
- c) Please confirm Enbridge's understanding of the size of pipe is correct. If Enbridge's information is not correct, please provide the size of pipe.

Interrogatory #3

Reference: Harten, Page 5

"Stantec has concluded that wildlife corridors and linkages have already been fragmented by the existing road network, and that as a result of the marginal habitat provided by the road Row's habitats along the preferred route are not anticipated as a significant wildlife habitat...We disagree with these conclusions..."

Question:

- a) Does Harten have any existing reports to support Harten's position? If so, please file such reports.