

Enbridge Gas Distribution Inc.

Application for

**Leave to Construct Natural Gas Pipeline
Dow Moore, Corunna and Seckerton Pipeline
Project**

EB-2010-0302

Board Staff Interrogatories

1. Reference: Pre-filed evidence Exhibit A, Tab 3, Schedule 1, Page 1

According to the pre-filed evidence, the proposed pipeline construction is part of the series of storage enhancement projects which "...may culminate in an increase of storage capacity of approximately 17.5 Bcf".

What is the time-line for developing the full 17.5 Bcf of incremental storage? How will this 17.5 Bcf of new storage capacity be incorporated in the next Cost of Service and/or IRM applications to be filed with the Board in 2010?

2. Reference: Pre-filed evidence Exhibit A, Tab 3, Schedule 1, Page 1

Enbridge stated that this pipeline expansion would enable Enbridge to offer approximately 4.5 Bcf of incremental storage services. Enbridge held an open season in March and November 2010 and "is currently in the process of finalizing terms of contracts for 4.5 Bcf capacity.

What is the anticipated timeline for finalizing and executed the contracts for the 4.5 Bcf of storage services commencing in 2011?

3. Reference: Pre-filed evidence Exhibit A, Tab 3, Schedule 1, Page 2
Decision with Reason, NGEIR, EB-2005-0551, page 102, November 7, 2006.

The NGEIR decision directed the following:

“All of Enbridge’s current storage assets (storage facilities and contracts) are required to serve its in-franchise customers. Thus, all of Enbridge’s storage-related transactional services revenues today are derived from “utility assets.” If and when Enbridge increases the capacity of its Tecumseh storage facilities, it will be necessary for the company to adopt a method of allocating storage-related Transactional Services revenues between utility and non-utility assets.”

Enbridge noted that, “Consistent with the NGEIR Decision, these projects are being funded by Enbridge’s shareholders...” Enbridge put on the record that it is preparing a report on the cost allocation between regulated and unregulated storage services which would be filed with the Earnings Sharing Mechanism proceeding.

What is the planned timing for filing Enbridge’s report on cost allocation between regulated and unregulated storage services? Please discuss how will the report implement Board’s ruling in the NGEIR decision that Enbridge “adopt a method of allocating storage-related Transactional Services revenues between utility and non-utility assets”.

4. In light of the fact that Enbridge is currently contracting storage from Union Gas Limited to provide storage to its in-franchise customers, please discuss the rationale for offering incremental storage capacity to the market as opposed to freeing up the contracted capacity to provide storage to Enbridge’s in-franchise customers.
5. Reference: Letter of Comment sent to the Board, dated February 5, 2011, from Mr. Tom Wilson and Mr. Joe Wellington, Attachment A to these IRs

In response to the Notice, the Board received a letter of comment, dated February 5, 2011, from Mr. Tom Wilson on his own behalf and on behalf of Mr. Joe Wellington who are storage landowners in Coruna Pool. The landowners raise several concerns with communication with Enbridge regarding the proposed project.

- a. Please describe the current status of communication between Enbridge and Mr. Wilson and Mr. Wellington.
 - b. What is Enbridge's plan to improve communication and address the concerns of these landowners in relation to proposed storage enhancement?
6. Reference: Reference: Pre-filed evidence Exhibit B, Tab 2, Schedule 1, Appendix B

Please provide an updated and anticipated timeline for obtaining approvals and permits related to the proposed pipeline from other agencies.

7. Reference: Reference: Pre-filed evidence Exhibit B, Tab 2, Schedule 3, Pages 1-5, Addendum to the Environmental Report

In the Addendum to the Environmental Report, dated December 16, 2010 ("Addendum") Stantec included an e-mail from the MNR dated December 9, 2010. The e-mail recommended that Stantec obtain more information, either by field survey or from secondary sources, on the following: (i) Species at Risk ;(ii) Significant Wildlife Habitats;(iii) Significant woodlands; (iv) Significant wetlands; (v) Significant valleylands (vi) Petroleum resources.

Please describe if the MNR's recommendations for additional information have been or will be addressed by Enbridge and/or Stantec. Please file copies of communication with the MNR on this matter.

Please explain whether any of the information and survey requirements indicated by the MNR will potentially affect the construction schedule. If so, how will Enbridge adapt the construction schedule to accommodate the surveys?

8. Please comment on the proposed draft conditions of approval prepared by Board Staff. Please note that Board Staff may propose modifications or additions to these conditions depending on the information provided by Enbridge in response to these IRs.

EB-2010-0302

Enbridge Gas Distribution Inc. Leave to Construct Application

Board Staff Proposed Draft

Conditions of Approval

1 General Requirements

- 1.1 Enbridge Gas Distribution Inc. ("Enbridge") shall construct the facilities and restore the land in accordance with its application and the evidence filed in EB-2010-0302 except as modified by this Order and these Conditions of Approval.
- 1.2 Unless otherwise ordered by the Board, authorization for Leave to Construct shall terminate December 31, 2011, unless construction has commenced prior to that date.
- 1.3 Enbridge shall implement all the recommendations of the Environmental Report filed in the pre-filed evidence, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee ("OPCC") review.
- 1.4 Enbridge shall advise the Board's designated representative of any proposed material change in construction or restoration procedures and, except in an emergency, Enbridge shall not make such change without prior approval of the Board or its designated representative. In the event of an emergency, the Board shall be informed immediately after the fact.
- 1.5 Within 15 months of the final in-service date, Enbridge shall file with the Board Secretary a Post Construction Financial Report. The Report shall indicate the actual capital costs of the project and shall explain all significant variances from the estimates filed in the proceeding.

2 Project and Communications Requirements

- 2.1 The Board's designated representative for the purpose of these Conditions of Approval shall be the Manager, Natural Gas Applications.

- 2.2 Enbridge shall designate a person as project engineer and shall provide the name of the individual to the Board's designated representative. The project engineer will be responsible for the fulfillment of the Conditions of Approval on the construction site. Enbridge shall provide a copy of the Order and Conditions of Approval to the project engineer, within seven days of the Board's Order being issued.
- 2.3 Enbridge shall give the Board's designated representative and the Chair of the OPCC ten days written notice in advance of the commencement of the construction.
- 2.4 Enbridge shall furnish the Board's designated representative with all reasonable assistance for ascertaining whether the work is being or has been performed in accordance with the Board's Order.
- 2.5 Enbridge shall file with the Board's designated representative notice of the date on which the installed pipelines were tested, within one month after the final test date.
- 2.6 Enbridge shall furnish the Board's designated representative with five copies of written confirmation of the completion of construction. A copy of the confirmation shall be provided to the Chair of the OPCC.

3 Monitoring and Reporting Requirements

- 3.1 Both during and after construction, Enbridge shall monitor the impacts of construction, and shall file four copies of both an interim and a final monitoring report with the Board. The interim monitoring report shall be filed within six months of the in-service date, and the final monitoring report shall be filed within fifteen months of the in-service date. Enbridge shall attach a log of all complaints that have been received to the interim and final monitoring reports. The log shall record the times of all complaints received, the substance of each complaint, the actions taken in response, and the reasons underlying such actions.
- 3.2 The interim monitoring report shall confirm Enbridge's adherence to Condition 1.1 and shall include a description of the impacts noted during construction and the actions taken or to be taken to prevent or mitigate the long-term effects of the impacts of construction. This report shall describe any outstanding concerns identified during construction.
- 3.3 The final monitoring report shall describe the condition of any rehabilitated land and the effectiveness of any mitigation measures undertaken. The results of the

monitoring programs and analysis shall be included and recommendations made as appropriate. Any deficiency in compliance with any of the Conditions of Approval shall be explained.

4 Other Approvals and Agreements

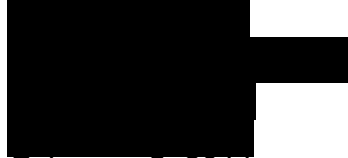
- 4.1 Enbridge shall obtain all other approvals, permits, licences, and certificates required to construct, operate and maintain the proposed project, shall provide a list thereof, and shall provide copies of all such written approvals, permits, licences, and certificates upon the Board's request.

Attachment A

To Board Staff IRs

EB-2010-0302

Tom Wilson



February 5, 2011

Ontario Energy Board
PO Box 2319
2300 Yonge St, Suite 2701
Toronto, ON M4P 1E4

Attention: Board Secretary

Dear Sir or Madam,

EB-2010-0302 Concerns

My name is Tom Wilson, of [REDACTED] In this letter I will be representing myself and Joe Wellington. Both Mr. Wellington and I have some major concerns with this project, which I will briefly outline.

Within the study area I am owner of one property, and I am a tenant farmer of eight others. The following three properties are directly affected by this project:

- [REDACTED]

It seems the Landowner Representative from Enbridge does not have the time to discuss our concerns/issues with this project. A project such as this should have been in the discussion stage with landowners for at least the past 6 months, to discuss the how the landowners/tenants will be impacted. Personally, I have only received one verbal response (regarding crop damage payment).

The project's start date is less than 4 months away and still there have been no written commitments - I have concerns with this. Enbridge has a reputation to finish the job then spend the next year completing settlements.

The study report that was sent out to all interested parties was difficult to read – the mapped routes for the pipelines were supposed to be different colours and our maps were in black and white.

Board Secretary
Re: EB-2010-0302 Concerns
February 5, 2011
Page 2

Enbridge's landowner records still indicate Keith Wilson (my father, who passed in 1997 – his name was removed from the deed in 1998) as landowner. 12+ years later, and still no effort has been made to amend their records.

Lastly, there is a major concern that belongs to Joe Wellington. His property, and that of Nova Chemicals (of which he owns the mineral rights) do not have leases on them with Enbridge. He has a "Direction from the Board" which dictates that he allows Imperial Oil Ltd to store gas and install pipelines. He is agreeable to the "Direction from the Board" but he strongly believes that this project exceeds what he is obligated to allow Enbridge to do. For this, he feels he needs to have direct contact with the board to have a meaningful discussion on this subject. (Because of Joe Wellington's age and health, we request an oral hearing to be held locally at the expense of Enbridge Gas Distribution Inc.)

We thank-you in advance for your attention in this matter.

Respectfully yours,

Tom Wilson & Joe Wellington