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May 21, 2013

Delivered by Email and Courier

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
26th Floor, Box 2319
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Enbridge Gas Distribution Inc. (“EGD”) Application for Leave to Construct – Greater Toronto Area (“GTA”) Project
Union Gas Limited Application for Leave to Construct – Parkway West and Brantford-Kirkwall/Parkway D Projects
Board File Nos. EB-2012-0451/EB-2012-0433/EB-2013-0074**

We are counsel to Metrolinx in the above-captioned matter. Please find attached Metrolinx’s Interrogatories in this combined proceeding. Paper copies of this letter and the accompanying Interrogatories will be delivered to you by courier, and we will provide a Word version of the Interrogatories to Enbridge and Union.

Should you have any questions or require further information in this regard, please do not hesitate to contact me.

Yours very truly,

BORDEN LADNER GERVAIS LLP

Per:

Original signed by James C. Sidlofsky

James C. Sidlofsky

cc: Mary Martin, Metrolinx
Shari Lynn Sprat (EGD)
Scott Stoll (Aird & Berlis LLP)
Mary Jane Patrick (Union)
Karen Hockin (Union)
Crawford Smith (Torys LLP)

TOR01: 5189010: v1

EB-2012-0451
EB-2012-0433
EB-2013-0074

IN THE MATTER OF an application by Enbridge Gas Distribution Inc. for: an order or orders granting leave to construct a natural gas pipeline and ancillary facilities in the Town of Milton, City of Markham, Town of Richmond Hill, City of Brampton, City of Toronto, City of Vaughan and the Region of Halton, the Region of Peel and the Region of York; and an order or orders approving the methodology to establish a rate for transportation services for TransCanada Pipelines Limited;

AND IN THE MATTER OF an application by Union Gas Limited for: an Order or Orders for pre-approval of recovery of the cost consequences of all facilities associated with the development of the proposed Parkway West site; an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in the Town of Milton; an Order or Orders for pre-approval of recovery of the cost consequences of all facilities associated with the development of the proposed Brantford-Kirkwall/Parkway D Compressor Station project; an Order or Orders for pre-approval of the cost consequences of two long term short haul transportation contracts; and an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in the City of Cambridge and City of Hamilton.

INTERROGATORIES OF METROLINX

DELIVERED MAY 21, 2013

B.2 – Metrolinx 1:

Reference: Union Application Schedule A; Section 11; and Schedule 1-1

Questions:

- (a) Please list all crossings of GO Transit/Metrolinx rail lines and facilities (including, without limitation, stations, access roads, and parking lots and structures) being proposed by Union.
- (b) If Union proposes to route its proposed facilities along any GO Transit/Metrolinx rail lines, please identify the locations in which it is proposed that this will take place.
- (c) With respect to both (a) and (b) above, in the event that Union is proposing to cross GO Transit/Metrolinx rail lines and/or facilities, or is

proposing to route its proposed facilities along any GO Transit/Metrolinx rail lines:

- (i) Please describe all anticipated temporary and permanent impacts of the construction and operation of the proposed pipeline on existing and planned GO Transit facilities. The description of impacts should include, without limitation, all anticipated disruption in train travel and reductions in access to and use of parking facilities. Facilities should include, without limitation, GO train lines, Park and Ride lots and current and future GO stations.
- (ii) Please advise as to how Union will address any impacts on GO Transit/Metrolinx facilities.
- (iii) Please provide all available detailed engineering plans, construction plans with laydown areas, and planned depths of pipe in the vicinity of GO Transit facilities, including stations, Park and Ride lots and track crossings.

C.2 – Metrolinx 2:

Reference: Union Application Schedule A; Section 8; and Schedule 1-1

Questions:

- (a) Please list all crossings of GO Transit/Metrolinx rail lines and facilities (including, without limitation, stations, access roads, and parking lots and structures) being proposed by Union.
- (b) If Union proposes to route the proposed pipeline along any GO Transit/Metrolinx rail lines, please identify the locations in which it is proposed that this will take place.
- (c) With respect to both (a) and (b) above, in the event that Union is proposing to cross GO Transit/Metrolinx rail lines and/or facilities, or is proposing to route its proposed facilities along any GO Transit/Metrolinx rail lines:
 - (i) Please describe all anticipated temporary and permanent impacts of the construction and operation of the proposed pipeline on existing and planned GO Transit facilities. The description of impacts should include, without limitation, all anticipated disruption in train travel and reductions in access to and use of parking

facilities. Facilities should include, without limitation, GO train lines, Park and Ride lots and current and future GO stations.

- (ii) Please advise as to how Union will address any impacts on GO Transit/Metrolinx facilities.
- (iii) Please provide all available detailed engineering plans, construction plans with laydown areas, and planned depths of pipe in the vicinity of GO Transit facilities, including stations, Park and Ride lots and track crossings.

D.2 – Metrolinx 3:

Reference: EGD I Exhibit B – Routing and Environmental (as updated February 12, 2013)

Questions:

- (a) Please list all crossings of GO Transit/Metrolinx rail lines and facilities (including, without limitation, stations, access roads, and parking lots and structures) being proposed by EGD I.
- (b) If EGD I proposes to route the proposed pipeline along any GO Transit/Metrolinx rail lines, please identify the locations in which it is proposed that this will take place.

D.2 – Metrolinx 4:

Reference: Ex.B/T2/S1/Att.4/p.4 – Updated Segment A Mitigation Measures (as updated 20130212)

Preamble:

According to the February 2013 Environmental Report Amendment, EGD I has made changes to Segment A. The changes include (among others) reducing the length of that Segment by changing the start point and relocating the proposed Parkway West Gate Station and associated tie-in.

Questions:

- (a) Please confirm that with the proposed changes to Segment A, the Lisgar GO Station and related facilities (including, without limitation, the station,

access roads, and parking lots and structures erected on the station lands) will no longer be affected by the proposed pipeline.

- (b) Please advise as to whether EGDI's changes to Segment A create any need for Union Gas to cross GO Transit/Metrolinx rail lines and facilities (including, without limitation, stations, access roads, and parking lots and structures) and/or route any portion of the proposed Union pipeline along any GO Transit/Metrolinx rail lines. If the changes will require Union to cross GO Transit/Metrolinx rail lines and facilities and/or route any portion of the proposed Union pipeline along any GO Transit/Metrolinx rail lines, please identify the affected facilities and lines.

D.2 – Metrolinx 5:

Reference: Ex.B/T2/S1/Att.1/Section 7/pdf page 411 of 753 – second page of May 2012 “Common Questions Raised and Responses Provided at the First Set of Open Houses”

Preamble: At the referenced page, the following Question and Answer are provided:

- Q.** Will the proposed pipeline interfere with planned transit expansion projects (e.g. TTC Subway expansion to York University or the 407 Transitway)?
- A.** The project team is working with the Ministry of Transportation, 407 ETR Group, Metrolinx, York Regional Transit and Toronto Transit Commission to make sure that any interactions between the proposed pipeline routes and transit (existing and planned) are managed and dealt with appropriately.

Question:

- (a) Please advise as to how GO Transit/Metrolinx planned track and station expansions will be addressed by EGDI.

D.2 – Metrolinx 6:

Reference: Ex.B/T2/S1/Att.1/Section 9/pdf pages 424-428 of 753 – Meeting Summary from Pre-Consultation meeting with GO Transit and Metrolinx

Questions:

- (a) Please describe the trenchless technologies mentioned in this summary and explain how they will avoid impacts on GO Transit/Metrolinx facilities.

- (b) Please describe all anticipated temporary and permanent impacts of the construction and operation of the proposed pipeline on existing and planned GO Transit facilities. The description of impacts should include, without limitation, all anticipated disruption in train travel and reductions in access to and use of parking facilities. Facilities should include, without limitation, GO train lines, Park and Ride lots and current and future GO stations (for example, the future GO station planned for the area near the start point of Segment A as shown in the map accompanying the meeting summary, the planned station on the 407 Transitway at Bathurst Street, the existing South Parking Lot for the Langstaff GO Station and the Hurontario/Hwy 407 Go Park and Ride Lot).
- (c) Please discuss how the planned expansion of the GO tracks at the Bramalea GO station (from two tracks to three) and on the west side of Keele Street south of Hwy. 407 (from one track to two) will be provided for by EGDI.
- (d) Please provide all available detailed engineering plans, construction plans with laydown areas, and planned depths of pipe in the vicinity of GO Transit facilities, including stations, Park and Ride lots and track crossings.