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August 2, 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 related to the updated (July 22, 2013) EGDI evidence in this combined proceeding, delivered in accordance with Procedural Order No. 6. Please note that two of the questions are directed to Union.

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: 5297850: 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 ON
JULY 22, 2013 UPDATED ENBRIDGE GAS DISTRIBUTION INC.
EVIDENCE IN RELATED TO SEGMENT A OF THE GTA PROJECT**

DELIVERED AUGUST 2, 2013

B.2 – Metrolinx 7 updated:

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

EGDI evidence update filed July 22, 2013 in EB-2012-0451, and more particularly Exhibit A, Tab 2, Schedule 4, p.5, para.7 updated July 22, 2013 (description of Update No. 6).

Preamble: In its June 7, 2013 response to Interrogatory B.2 – Metrolinx 1, Union advised that “Union is not proposing any crossings or construction parallel to any GO Transit/Metrolinx rail lines or other facilities.”

In its July 2013 evidence update, EGDI has proposed to lengthen Segment A of its proposed pipeline by reinstating the original route at the western end of the line and adding a 1.5 km route extension to southwest

of the Derry Road and Highway 407 intersection in the Town of Milton in order to meet the proposed Union Gas Parkway West Station site at its revised location.

Questions:

- (a) Please confirm that Union is not proposing any crossings or construction parallel to any GO Transit/Metrolinx rail lines or other facilities notwithstanding the reinstatement of the original route of Segment A of the EGD I pipeline for 5 km at the western end of the line and the proposed 1.5 km extension of Segment A, and any revisions to the location of Union facilities. If Union is now proposing crossings or construction parallel to any GO Transit/Metrolinx rail lines or other facilities, please answer questions (b) through (d).
- (b) 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.
- (c) 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.
- (d) With respect to both (b) and (c) 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 8 updated:

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

EGDI evidence update filed July 22, 2013 in EB-2012-0451, and more particularly Exhibit A, Tab 2, Schedule 4, p.5, para.7 updated July 22, 2013 (description of Update No. 6).

Preamble: In its June 7, 2013 response to Interrogatory C.2 – Metrolinx 2, Union advised that “Union is not proposing any crossings or construction parallel to any GO Transit/Metrolinx rail lines or other facilities.”

In its July 2013 evidence update, EGD has proposed to lengthen Segment A of its proposed pipeline by reinstating the original route for 5 km at the western end of the line and adding a 1.5 km route extension to southwest of the Derry Road and Highway 407 intersection in the Town of Milton in order to meet the proposed Union Gas Parkway West Station site at its revised location.

Questions:

- (a) Please confirm that Union is not proposing any crossings or construction parallel to any GO Transit/Metrolinx rail lines or other facilities notwithstanding the reinstatement of the original route of Segment A of the EGD pipeline for 5 km at the western end of the line and the proposed 1.5 km extension of Segment A, and any revisions to the location of Union facilities. If Union is now proposing crossings or construction parallel to any GO Transit/Metrolinx rail lines or other facilities, please answer questions (b) through (d).
- (b) 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.
- (c) 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.
- (d) With respect to both (b) and (c) 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 9 updated:

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

EGD I Exhibit B – Routing and Environmental (as updated July 22, 2013)

Preamble: In its June 7, 2013 response to Interrogatory D.2 – Metrolinx 3, EGD I provided its list of 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 based on its proposed route for the GTA Project.

In its July 2013 evidence update, EGD I has proposed to lengthen Segment A by reinstating the original route for 5 km at the western end of the line and adding a 1.5 km route extension to southwest of the Derry Road and Highway 407 intersection in the Town of Milton in order to meet the proposed Union Gas Parkway West Station site at its revised location.

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 in those portions of Segment A that have been reinstated and/or added in EGD I's July 22, 2013 evidence update.
- (b) If EGD I proposes to route the proposed pipeline along any GO Transit/Metrolinx rail lines in that portion of Segment A reinstated and/or added in EGD I's July 22, 2013 evidence update, please identify the locations in which it is proposed that this will take place.

D.2 – Metrolinx 10 updated:

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

Ex.B/T2/S1/Att.1/p.150 – September 20, 2012 Final GTA Project Environmental Report

Preamble: According to the February 2013 Environmental Report Amendment, EGD I had made changes to Segment A that included (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.

In its response to Interrogatory D.2 – Metrolinx 4, EGD I confirmed that with those 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) would no longer be affected by the proposed pipeline.

In its July 22, 2013 update, EGD I has proposed to reinstate the originally proposed route and add a 1.5 km route extension.

Questions:

- (a) Please describe all anticipated temporary and permanent impacts of the construction and operation of the portion of Segment A proposed to be reinstated and/or added in EGD I's July 22, 2013 evidence update on existing and planned GO Transit facilities including, without limitation, the Lisgar GO Station and related facilities (including, without limitation, the station, access roads, and parking lots and structures erected on the station lands). 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.
- (b) Please advise as to how EGD I intends to address these impacts.
- (c) Please advise as to whether EGD I's changes to Segment A in the July 22, 2013 EGD I evidence update 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) In the event that any are now available, 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 11 updated:

References: 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”

EGDI response to Interrogatory D.2 – Metrolinx 5

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.

In its response to Interrogatory D.2 – Metrolinx 5, EGD I stated:

“EGDI will design and construct the proposed pipeline for all known and currently available GO Transit/Metrolinx planned track and station expansions in accordance with the TC E-10, *Standards Respecting Pipeline Crossing Under Railways*, the CSA Z662-11, *Oil and Gas Pipeline Systems* Canadian Standards Association, and Enbridge’s Policy and Procedural Manual, which meets or exceed the aforementioned standards.”

Question:

- (a) Please advise as to whether this statement also applies to the manner in which any GO Transit/Metrolinx planned track and station expansions in the portion of Segment A proposed to be reinstated and/or added in EGD I’s July 22, 2013 evidence update will be addressed by EGD I.
- (b) If the statement is not applicable to any GO Transit/Metrolinx planned track and station expansions in the reinstated and/or added areas, please advise as to how they will be addressed by EGD I.