

**Board Staff Interrogatories
Application
Enbridge Gas Distribution Inc.
Chatham D Designated Storage Pool Amendment
December 22, 2014**

1. References:

Pre-filed Evidence, Exhibit B, Tab 1, Schedule 1, page 5, paragraph 10; and Exhibit C, Tab 1, Schedule 1, page 1 paragraph 2; Exhibit C, Tab 1, Schedule 4, Landowner Key Map.

Preamble:

According to the pre-filed evidence, Enbridge is in discussions with the Municipality of Chatham-Kent to obtain a lease for the areas under municipal right-of-way. These municipal areas are located in the existing Designated Storage Area ("DSA") and in the proposed amended area.

Questions:

- a) Please discuss the status and prospects of discussions with the Municipality of Chatham-Kent regarding the agreement related to the municipal lands within the boundaries of the proposed amended DSA.
- b) Please include the form of easement agreement that Enbridge would offer to the Municipality.
- c) What are the differences, if any, between a form of easement agreement offered to private landowners and a form offered to the Municipality?

2. References: Pre-filed Evidence, Exhibit B, Tab 1, Schedule 1, page 5, paragraph 14; Exhibit B, Tab 1, Schedule 3, "Sproule Report"

Preamble:

According to the pre-filed evidence, the "Sproule Report" was completed as a supporting geological evidence for Enbridge's application. Enbridge also noted that it met with the Ministry of Natural Resources ("MNRF")¹ as part of consultation on the proposed amendment of the DSA boundaries.

Questions:

- a) Was the "Sproule Report" provided to the MNRF for review? If so, what were the MNRF's comments, if any?
- b) When did the meetings between Enbridge and the MNRF take place and what was the purpose of the meetings?
- c) Did the MNRF issue to Enbridge any formal document (e.g. Record of Technical Data Reviewed for a Proposed Gas Storage Area) in which it confirmed its agreement with the proposed amendment of the DSA boundaries? If so, please explain the process for obtaining such document and file a copy in response to this interrogatory.

¹ Now Ministry of Natural Resources and Forestry ("MNRF")