

June 17, 2016

BY RESS & COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

**Re: Union Gas Limited (“Union”)
Leamington Expansion Project
Board File #EB-2016-0013**

Attached please find Union Gas Limited (“Union”) Reply Submissions regarding Union’s Proposed Leamington Expansion Project.

Sincerely,

[original signed by]

William T. Wachsmuth
Senior Administrator, Regulatory Projects
:sb
Encl.

cc: L. Gluck, OEB
M. Millar, OEB
All Intervenors

Union Gas Limited

UNION REPLY SUBMISSION

June 15, 2016

**Union Gas Limited
Leamington Expansion Project
EB-2016-0013**

Introduction

Union Gas Limited (“Union”) received a reply submission from the Ontario Energy Board Staff (“OEB or Board”) regarding Union’s proposed Leamington Expansion Project. Board Staff submissions supported the proposed project. Board Staff have also requested that Union respond to specific issues they have identified.

Lands Issues

Union has discussed the location of the SECTR facilities and the location of Union’s proposed natural gas pipeline with Hydro One Networks Inc. (“Hydro One”) on a number of occasions since the oral hearing. As committed to by Union at the oral hearing an AC Interference Study was completed to assess the co-location of the proposed Leamington Expansion pipeline and the SECTR facilities. This study was filed with the OEB on May 19, 2016. It was also provided to Hydro One for their review. A meeting was held on May 30, 2016 between Union and Hydro One to review the study and its findings. After the meeting a number of changes were made to the study at the request of Hydro One and a final study was submitted to the OEB on June 7, 2016. In particular, the study identified that in the site specific circumstances, a separation distance of four meters is acceptable between the pipeline and the base of the hydro towers. Hydro One did not dispute this finding and confirmed its’ acceptance of the study to the Board in a letter dated June 3, 2016.

Union will be constructing the pipeline in the location identified in its’ pre-filed evidence, which will ensure a four meter separation from the SECTR facilities. Union does not believe that it is necessary to add a Conditions of Approval to confirm what it has committed to do in evidence, testimony, and in correspondence subsequent to the oral hearing.

Cultural Heritage Study

The Ministry of Tourism, Culture and Sport (“MTCS”) identify in the OPCC review that the cultural heritage assessment did not encompass the full foot print of the project. Union retained AECOM to re-evaluate and resubmit a cultural heritage assessment. This assessment has been completed and was sent to MTCS in May of 2016. Union expects a response from MTCS in the near future. Union confirms that it will be a Conditions of Approval that Union is required to obtain all permits and approvals and can confirm that they will all be in place for construction.

Conditions of Approval

Union confirms that it can accept all of the proposed Conditions of Approval attached to Board Staff Interrogatory 7, with the exception of 2.b.i.

Condition 2.b.i. requires Union provide the OEB with 10 days notice prior to construction. As identified in Schedule 10 of the pre-filed evidence construction was proposed to start in early June. With the delays that have occurred to date, Union would propose to start construction within three days of the

OEB decision. Union therefore requests that the 10 days written notice be removed from the Conditions of Approval.

For the reasons stated above in the Lands Issues section, Union does not believe it is necessary to add an additional condition related to separation between the proposed pipeline and the SECTR facilities.

Timing of Approval

In Union's pre filed evidence at Schedule 10 construction of the pipeline was proposed to start in early June to take advantage of dry summer conditions for construction of the the proposed facilities and to ensure that an in-service date of November 1 could be achieved. As it now appears that all of the issues that have been raised in relation to the the project have been addressed, Union respectfully requests that the Board issue its decision and order regarding the project by June 30, 2016 and provide reasons for the decision at a later date.