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Enbridge Gas Distribution
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VIA COURIER AND RESS

May 23, 2017

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

**Re: Enbridge Gas Distribution Inc. ("Enbridge")
Application for the Renewal of the Franchise Agreement
Town of Collingwood – EB-2017-0159 - Revised Application**

Further to Enbridge Gas Distribution's revised franchise application dated April 27, 2017, attached please find the revised application for the Town of Collingwood which includes a Confidentiality request.

As the Franchise Agreement between the Town of Collingwood and Enbridge is set to expire on June 23, 2017, Enbridge wishes to apply to the Ontario Energy Board (the "Board") for an order granting approval of a new franchise agreement for the Town of Collingwood.

Enclosed please find two paper copies of the following:

- The aforementioned application;
- Schedule A – A map showing the location of the Town of Collingwood;
- Schedule B – The Certificate of Public Convenience and Necessity FBC 96 for the Town of Collingwood dated April 17, 1957;
- Schedule C – The current Town of Collingwood By-Law 97-30 and Franchise Agreement dated June 23, 1997;
- Schedule D – The signed Resolution No 099-17 from the Town dated March 13, 2017, the form of the By-law, and the proposed franchise agreement.

The application has been filed through the Board's Regulatory Electronic Submission System ("RESS"). The confirmation has been included in the package.

As noted in the Application, the Board requested Enbridge to, in addition to the customary information filed in support of franchise renewal applications, file a map of the relevant municipality that identifies all of the existing Enbridge gas mains. Enbridge is therefore

also filing in confidence a separate Schedule “A-1 Confidential” that constitutes the requested map. Enbridge requests confidential treatment of this Schedule by the Board for the following reasons:

- 1) Enbridge does not typically share large-scale gas main maps or information (“Mains Information”) with third parties as Mains Information is considered by Enbridge to be confidential and proprietary information. In the event that Enbridge does share Mains Information with third parties, it does so pursuant to a confidentiality undertaking or license to use the information for restricted purposes and to treat the information as confidential. For example, Enbridge may share Mains Information with municipalities, Ontario One Call and operations service providers for limited purposes. Enbridge also notes that its Mains Information is subject to change on a frequent basis and a static map may only be valid for a short period of time.
- 2) Enbridge submits that the public disclosure of Mains Information poses both a safety and a security risk. Access to Mains Information on the public record may be used by third parties to determine gas system configurations or “road maps” and points of sensitivity or vulnerability that may expose Enbridge to security risks. Further, persons planning developments or excavation projects may attempt to use the Mains Information in substitution for required locates, despite the fact that obtaining locates is required by law. Enbridge experiences well over 1000 damages every year, many of which are caused in part by a failure to obtain proper locates. Publicizing Mains Information may exacerbate this already serious safety concern that Enbridge works very hard to manage and control.
- 3) Mains Information reveals customer information and such information is normally protected from public disclosure by the Board (pursuant to the *Gas Distribution Access Rule* and *Affiliate Relationships Code for Gas Utilities*) and privacy legislation. If Enbridge has a gas main located in a particular right of way or area, a third party could assume that the majority of residents and businesses in that area receive gas service. This would be especially discernable in more isolated areas where there are few businesses or residents. Although Enbridge would not be revealing customer names and addresses directly, such information could easily be compiled with reasonable accuracy when combined with other publicly available information. Enbridge looks forward to receiving direction from the Board in this matter.

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The contact information for this matter follows below:

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Clerk

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Attn: Mark Wilson
Sr Advisor Municipal Affairs

Sincerely,

[original signed]

Lorraine Chiasson
Regulatory Coordinator

Attachment

cc: Guri Pannu – EGD, Legal Counsel, Regulatory
Mark Wilson – EGD, Sr. Advisor, Municipal Affairs
Tom Jedemann – EGD, Sr. Operations Manager