

July 25, 2017

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")
2018 Sudbury Replacement Project
Board File # EB-2017-0180**

Further to the interrogatories received in the above noted matter, please find attached two copies of Union's responses.

Sincerely,



Mary Jane Patrick
Analyst, Land Services
Encl.

cc: Zora Crnojacki
Nancy Marconi

EB-UNION GAS LIMITED

Answers to Interrogatories from Board Staff

Interrogatory # 1

Ref: Evidence page 1, paragraphs 1 and 4, page 5-6, paragraphs 20-24: “Growth”

Preamble:

The 2018 Sudbury Replacement Project (Project) involves replacement of two sections of the existing 10 inch diameter pipeline with a 12 inch diameter pipeline. The Project need is primarily to address integrity issues and to an extent to provide additional capacity to the system by upsizing the new pipeline. Union Gas estimated that the increased capacity will be about 5% of the total capacity of the Sudbury System. Union Gas noted that the Project is a continuation of 3 previous Sudbury system replacement projects approved by the OEB (EB-2015-0042; EB-2016-0122, and EB-2016-0222).

Questions:

- a) Please discuss the anticipated timeline for acquiring new loads by customer class (general service growth and contract customers) to be served by the incremental capacity related to upsizing the proposed pipeline.
- b) Is the existing 10 inch pipeline at full capacity? How much of the total new 12 inch pipeline capacity is a replacement of the existing 10 inch pipeline capacity?
- c) How much of the total new 12 inch pipeline capacity (including incremental 10,488 m³/hour) does Union Gas forecast using in the next 10 years?
- d) Has Union Gas incorporated in forecast demand over the next 10 years the ongoing and anticipated decline in customer usage as a result of Ontario government’s Cap and Trade Program and the Climate Change Action Plan?

Response:

- a) The Sudbury general service growth is predicted to be approximately 1400 m³/hr/year, which would utilize the incremental capacity in approximately 8 years. Currently no contract customer has made a request to expand their natural gas service. Union will work with each contract customer in the event they wish to increase their loads.

- b) The existing pipeline is currently operating at approximately 98% of its full load capacity. Based on a ratio of cross-sectional area approximately 71% of the 12 inch pipeline capacity is replacing the existing 10 inch pipeline capacity.
- c) Union Gas expects to use all the incremental capacity in the next 10 years.
- d) No. The impacts of Cap and Trade and the Climate Change Action Plan on facility sizing have not been determined. While annual customer usage is predicted to decline there has been no confirmation that peak hour demands will decline as well. Peak hour demands are used to size facilities.

UNION GAS LIMITED

Answers to Interrogatories from Board Staff

Interrogatory # 2

Ref: Evidence page 1, paragraphs 1 and 4, pages 5-6

Preamble:

Union Gas noted that the Project is a continuation of 3 previous Sudbury system replacement projects approved by the OEB (EB-2015-0042; EB-2016-0122, and EB-2016-0222).

Questions:

- a) Please discuss and explain Union Gas' approach to regional planning of its Sudbury System expansion and replacement.
- b) Did Union Gas consider filing a single application requesting approval of the 4 replacement/expansion projects (i.e. EB-2015-0042; EB-2016-0122; EB-2016-0222; EB-2017-0180)? If not, why not? Please discuss if such a comprehensive approach could be more effective in terms of planning incremental system capacity.
- c) Please indicate how much incremental capacity was provided to the Sudbury system by each of the three approved and completed Sudbury replacement projects (EB-2015-0042; EB-2016-0122, and EB-2016-0222).

Response:

- a) Union Gas determines system expansion projects based on future growth forecasts and/or signed contracts from Commercial/Industrial customers requesting natural gas service.

Replacement projects are assessed on an individual basis as part of the pipeline integrity and municipal replacement programs.

- b) Union was not able to file the four referenced projects completed in the past with the current project due to the specific requirements of the individual cases.

The EB-2015-0042 project was an integrity project that needed to be completed in 2015 to ensure the safe operation of the Sudbury system. The EB 2016-0122 project was a growth project where the Proposed Facilities were primarily required to serve the proposed loads requested by Victoria Mine. The EB-2016-0222 project was a class location project where it was necessary to replace the pipeline to ensure compliance

with the CSA code. The EB-2017-0180 project was required to comply with a move order given to Union by the City of Greater Sudbury.

- c) The incremental capacity provided by projects EB-2015-0042, EB-2016-0122 and EB-2016-0222 were 414m³/hr, 690m³/hr and 1242 m³/hr respectively.

UNION GAS LIMITED

Answers to Interrogatories from Board Staff

Interrogatory # 3

Ref: Evidence page 7, paragraph 32, pages 7-8, paragraphs 31-32: "Project Cost and Economics"

Preamble:

Union Gas estimated the total capital costs for the Project at \$74M. Union Gas stated that the incremental estimated cost of upsizing the pipeline from 10 inch to 12 inch diameter is \$1.5 M. Union Gas did not complete a Discounted Cash Flow (DCF) analysis for the Project, explaining that this Project is needed to address primarily the integrity issues and that the cost of the upsizing is not significant. Union Gas also explained that the upsize will provide incremental capacity for new, anticipated contracts (not acquired at this time). Union Gas also indicated that the increase in pipeline size will decrease the pipeline maintenance costs.

Questions:

- a) Please provide a breakdown of capital costs for comparable projects currently in-service and recently approved by the OEB.
- b) Please indicate the timing and the method for recovery of the construction costs for the Project.
- c) Is the estimate of \$ 1.5 M incremental cost based on the assumption that all costs (except materials) will be the same regardless of the difference in diameter of the replacement pipeline?
- d) Please discuss if the increased size of the replacement pipeline affects the requirements for new easements?
- e) Please explain the approach to recovering the of \$1.5 M estimated costs associated with upsizing the pipeline.
- f) Given that the considerable length of the existing pipeline in the rest of the Sudbury System will still be 10 inch diameter; does Union expect a significant decrease in maintenance costs from the Project? What is the estimated reduction in maintenance cost resulting from the Project?

Response:

a)

Case #	Project name	Length	Diameter	Cost	Cost /meter
EB-2015-0042	Sudbury NPS 10 Replacement Project	.7 Km	NPS 12	\$ 2.0 M	\$2857.00
EB-2016-0122	2016 Sudbury Replacement Project	.85 Km	NPS 12	\$ 2.2 M	\$ 2588.00
EB-2016-0222	Sudbury Maley Replacement Project	2.8 Km	NPS 12	\$ 6.3 M	\$ 2250.00
Eb-2017-0180	2018 Sudbury Replacement Project	20 Km	NPS 12	\$ 74 M	\$ 3700.00*

*Variations in cost per metre are significantly influenced by specific project scope parameters. The 2018 Sudbury Replacement Project has large proportions of rock excavation, wetland management, a specialized Cathodic Protection design and bypass installations, which are all costly activities that are not present to the same extent or not present at all in the previously approved OEB projects as indicated in the table. It is the influence of this construction scope that has increased the cost per metre for the 2018 Sudbury Replacement Project.

- b) Union will be seeking cost recovery of the Sudbury Replacement Project as part of its 2019 rates application.
- c) No, the estimate of \$1.5 M incremental cost to install a NPS 12 over a NPS 10 considers both the material and contractor costs for these specific diameter pipelines.
- d) Union is able to construct the Proposed Facilities in the existing easement. The increased size of the new pipeline does not require the existing easement to be enlarged.
- e) Union will be seeking cost recovery of the Sudbury Replacement Project as part of its 2019 rates application.

- f) The length of the NPS 10 pipeline portion of the Sudbury Transmission system is longer than the proposed replacement but it is this portion of the NPS 10 Sudbury Transmission system that is experiencing a concentration of integrity issues driven by the unique localized terrain features and localized influences from the mining activities in the Sudbury Basin. The replaced pipeline section will remove known integrity issues eliminating the need to repair the existing pipeline. The current forecast for managing known integrity concerns in this section of the Sudbury transmission system is \$8-\$10 million over the next several years. Replacing the current pipeline will also address future integrity concerns that over time will require additional repairs and future maintenance expenditures as the current pipeline continues to experience external corrosion. Having a single diameter NPS 12 pipeline will improve the effectiveness of future inline inspections.

UNION GAS LIMITED

Answers to Interrogatories from Board Staff

Interrogatory # 4

Ref: Evidence pages 15-16, paragraphs 63-67 “Landowners”, Schedule 10, Schedule 11 “Pipeline Easement”

Preamble:

Details about type, size and location of all required easements are in Schedule 10 of the evidence. In addition to land rights, Union Gas will also need to obtain various crossing permits.

Union Gas indicated that the Coniston to Frood section requires 61 temporary land use easements, eight new permanent easements and possibly two new permanent easements for crossing Hydro One owned lands.

For the Azilda to Waldon section, Union Gas needs permanent and temporary easements along the entire segment.

According to section 97 of the *Ontario Energy Board Act, 1998* (OEB Act), “In an application under section 90, 91 or 92, leave to construct shall not be granted until the applicant satisfies the Board that it has offered or will offer to each owner of land affected by the approved route or location an agreement in a form approved by the Board.” Union Gas will therefore require the OEB’s approval of the form of easement agreement that it has offered or will offer to the affected landowners.

Union Gas stated that for 3 areas along the Azilda to Waldon section the exact location of the final easement will be determined after construction of the pipeline is completed. Union has stated that based upon previous discussions with Vale Canada Limited, who is the only landowner affected by this matter, it does not anticipate landowner objections to this approach.

Questions:

- a) Please confirm that the entire Project is located within the boundaries of the Greater City of Sudbury.
- b) What is the current status and prospect of communication and negotiations with all the landowners of properties where permanent easements and temporary land use rights are needed?
- c) What is the status of acquiring the crossing permits and other approvals Union Gas needs to complete the construction of the Project?

- d) Is the form of easement agreement Union Gas has offered or will offer to all directly affected landowners approved by the OEB and if so in which proceeding?
- e) In the form of easement agreement in in the evidence the consideration is set at \$2. Please confirm that \$2 is put in essentially as a placeholder, and that the actual amount of compensation will be different subject to negotiations with the landowners.
- f) Please explain Union Gas' approach to obtaining land rights for areas along the Azilda to Waldon section where the exact locations of the required land will not be known until construction is completed. Please confirm that Vale is the only affected landowner in these 3 areas?

Response:

- a) Confirmed.
- b) There have not been any objections to the project from any of the landowners.

Comprehensive Agreements have been delivered to 94% of the properties along the route of the Proposed Facilities; the remaining agreements will be delivered in the next month. Union has received signed documents back from 23% of the landowners.

It should be noted that over half of the properties where land rights are needed, encompassing over 85% of the length of the project, will come from Vale Canada Limited and the City of Greater Sudbury. Vale Canada Limited and the City of Greater Sudbury have both agreed to grant the necessary land rights to Union.
- c) Crossing permits are required from Hydro One and Canadian Pacific Railway ("CPR"). Drawings and application have been submitted to Hydro in July of 2017 for their review and approval. Application and drawings to CPR will be made in September.
- d) The form of easement was previously approved in the Panhandle Reinforcement Project EB-2016-0186
- e) Confirmed.
- f) Vale Canada Limited has agreed to grant Union Gas the specific land rights after construction has taken place. The location for the detailed route of the pipeline is currently in discussions and will be jointly decided by Union and Vale Canada Limited.

UNION GAS LIMITED

Answers to Interrogatories from Board Staff

Interrogatory # 5

Ref: Evidence, Schedule 9 “Map of Pipeline Route and Land Rights Required”
page 47-48 , Schedule 10

Preamble:

The maps in the Schedule 9 do not indicate the location of the existing pipeline. Also, there are certain areas where there is no clarity regarding the easements location or does not match the listing of easements in Schedule 10.

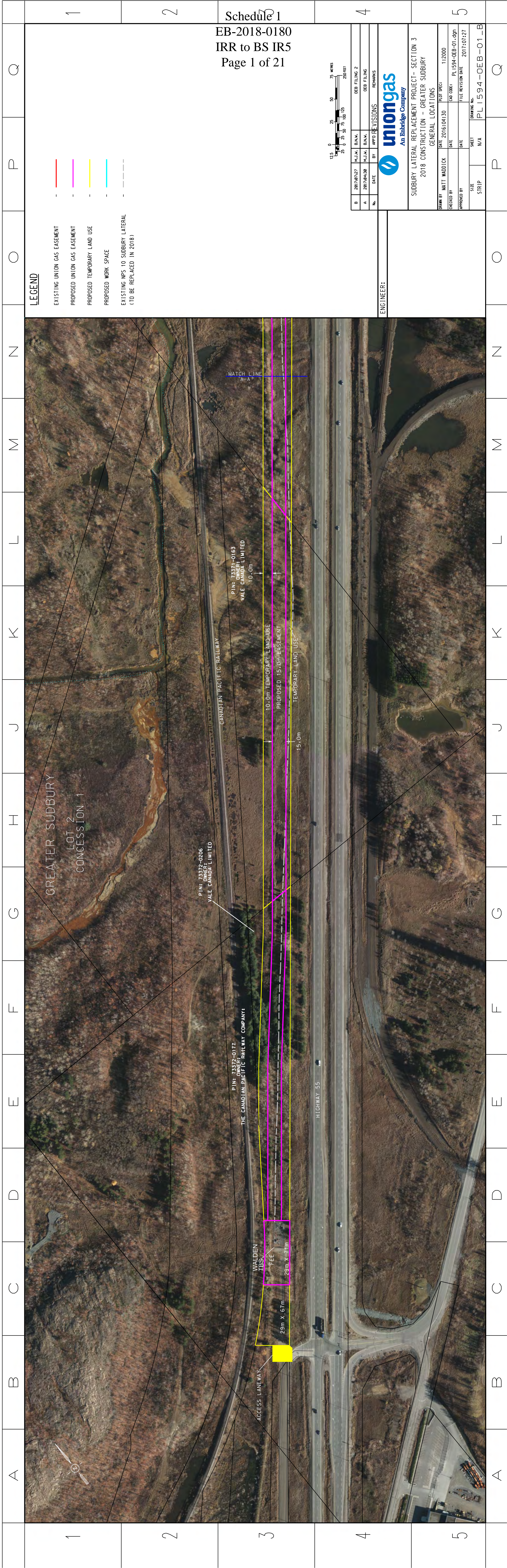
Questions:

- a) Please mark the location of the existing pipeline on the maps included in the evidence.
- b) The proposed pipeline in the map seems close to a house on Dorchester Crescent but this location is not listed in Schedule 10. Please explain and reconcile.
- c) There also seems to be an easement going through a house on Agincourt Avenue. Please explain.
- d) The map on page 48 shows an easement that seems to go right across the driveways of homes on Brookview Glen. However Brookview Glen is not listed in Schedule 10. Please explain.

Response:

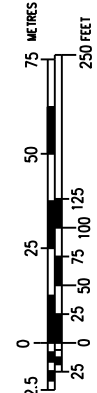
- a) Attached as Schedule 1 is mapping that shows the existing pipeline.
- b) Union’s existing easement and the additional temporary lands required to construct the Proposed Facilities in this location are on property owned by the City of Greater Sudbury. The house on Dorchester Crescent is on the lot adjacent to the City of Greater Sudbury’s property. The City of Greater Sudbury’s property in this location is listed as File# S22 in Schedule 10.
- c) The existing easement while near the house does not go through the house. It should be noted that the house was constructed after Union’s pipelines were constructed. Union has had discussions with this landowner regarding the project and they have not raised any objections.

- d) Union can confirm that the existing easement does go across the driveways in this location. The existing pipeline was constructed, and in place before the driveways were constructed. Union has had discussions with the property owner and is developing an access plan to ensure that people have access to their homes during construction. The property is listed as File# S36 in Schedule 10.



LEGEND

- EXISTING UNION GAS EASEMENT
- PROPOSED UNION GAS EASEMENT
- PROPOSED TEMPORARY LAND USE
- PROPOSED WORK SPACE
- EXISTING NPS 10 SUDBURY LATERAL (TO BE REPLACED IN 2018)

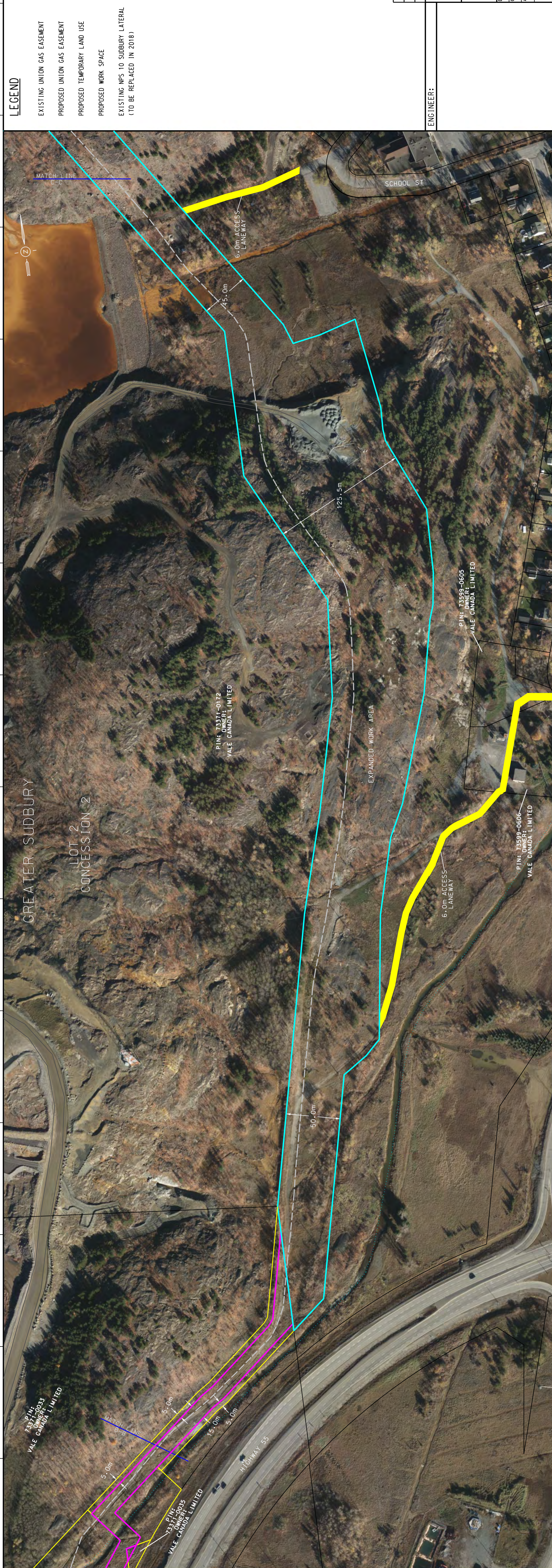


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A	2017/04/30	M.J.W.	B.N.W.	OEB FILING
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SUDBURY LATERAL REPLACEMENT PROJECT - SECTION 3
2018 CONSTRUCTION - GREATER SUDBURY
GENERAL LOCATIONS

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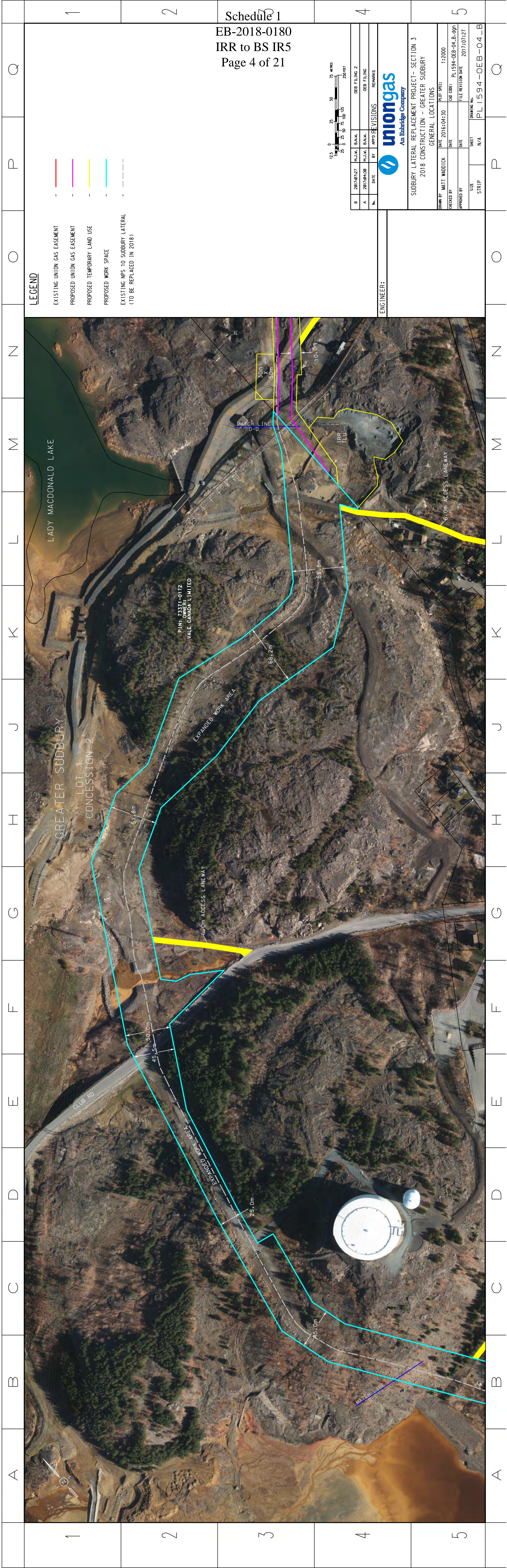
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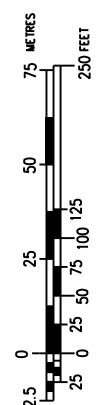
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2018 CONSTRUCTION - GREATER SUDBURY
GENERAL LOCATIONS

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LEGEND

- EXISTING UNION GAS EASEMENT
- PROPOSED UNION GAS EASEMENT
- PROPOSED TEMPORARY LAND USE
- PROPOSED WORK SPACE
- EXISTING NPS 10 SUDBURY LATERAL (TO BE REPLACED IN 2018)

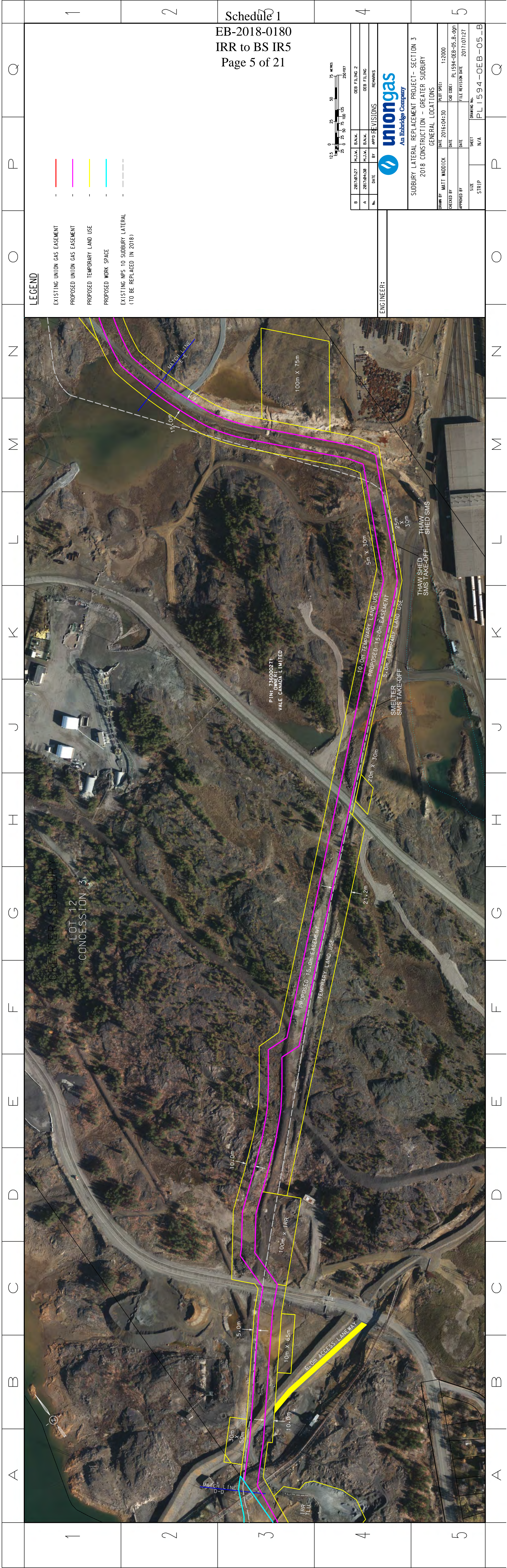


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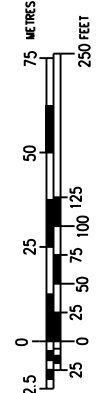
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2018 CONSTRUCTION - GREATER SUDBURY
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LEGEND

- EXISTING UNION GAS EASEMENT
- PROPOSED UNION GAS EASEMENT
- PROPOSED TEMPORARY LAND USE
- PROPOSED WORK SPACE
- EXISTING NPS 10 SUDBURY LATERAL (TO BE REPLACED IN 2018)



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SUDBURY LATERAL REPLACEMENT PROJECT- SECTION 3
2018 CONSTRUCTION - GREATER SUDBURY
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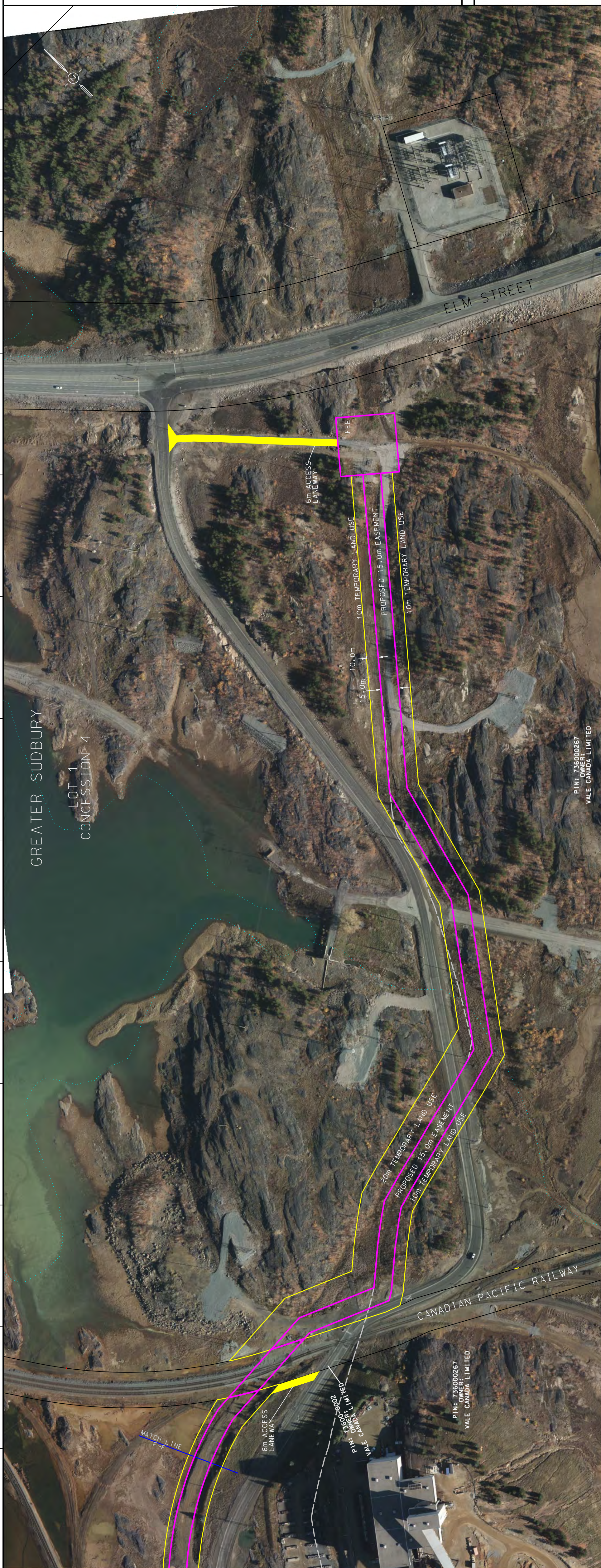
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PROPOSED UNION GAS EASEMENT

PROPOSED TEMPORARY LAND USE

RESPONSE WORK SPACE

EXISTING NPS 10 SUDBURY LATERAL
TO BE REPLACED (IN 2018)



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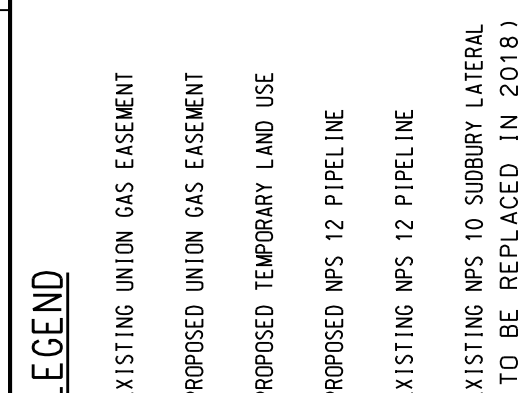
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SUDBURY LATERAL REPLACEMENT PROJECT- SECTION 3
2018 CONSTRUCTION - GREATER SUDBURY
GENERAL LOCATIONS

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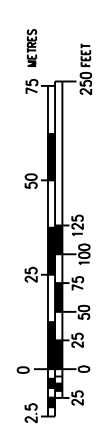
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LEGEND

- EXISTING UNION GAS EASEMENT
- PROPOSED UNION GAS EASEMENT
- PROPOSED TEMPORARY LAND USE
- PROPOSED NPS 12 PIPELINE
- EXISTING NPS 12 PIPELINE
- EXISTING NPS 10 SUDBURY LATERAL (TO BE REPLACED IN 2018)



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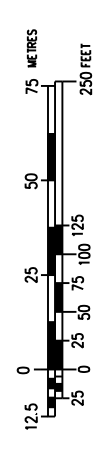
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- EXISTING UNION GAS EASEMENT
- PROPOSED UNION GAS EASEMENT
- PROPOSED TEMPORARY LAND USE
- PROPOSED NPS 12 PIPELINE
- EXISTING NPS 12 PIPELINE
- EXISTING NPS 10 SUDBURY LATERAL (TO BE REPLACED IN 2018)

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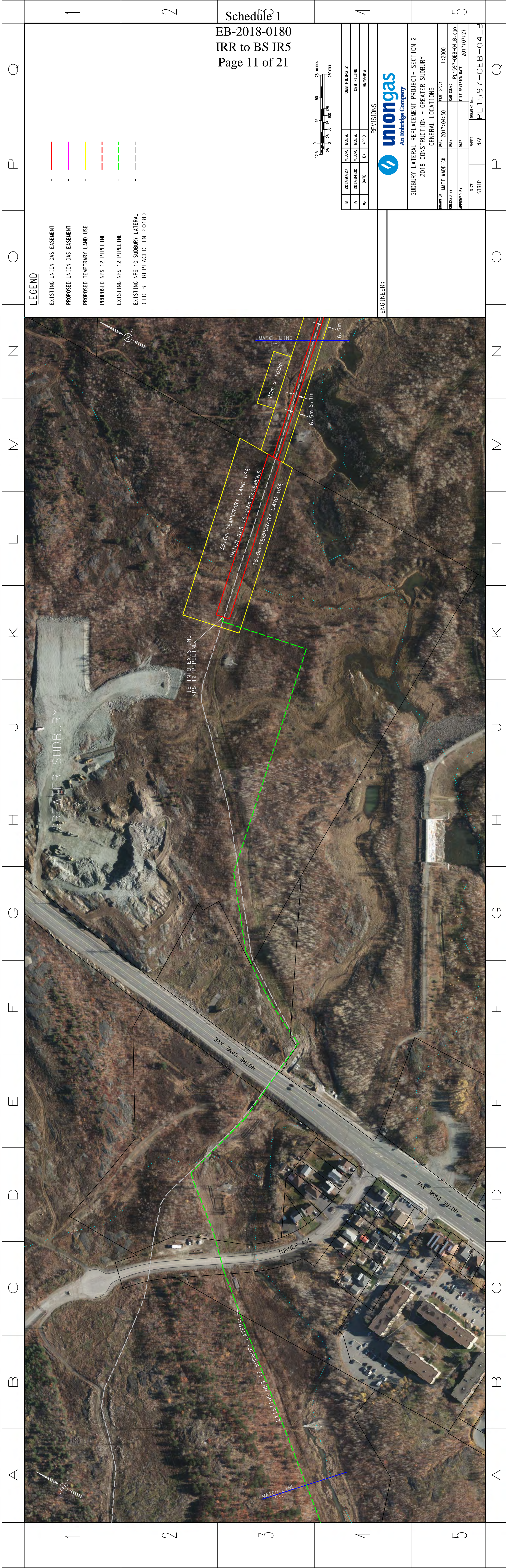
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GENERAL LOCATIONS

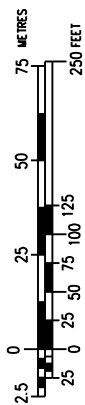
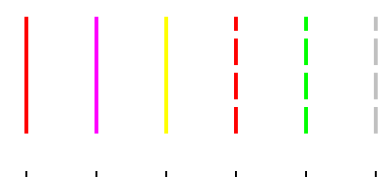
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- PROPOSED NPS 12 PIPELINE
- EXISTING NPS 12 PIPELINE
- EXISTING NPS 10 SUDBURY LATERAL (TO BE REPLACED IN 2018)



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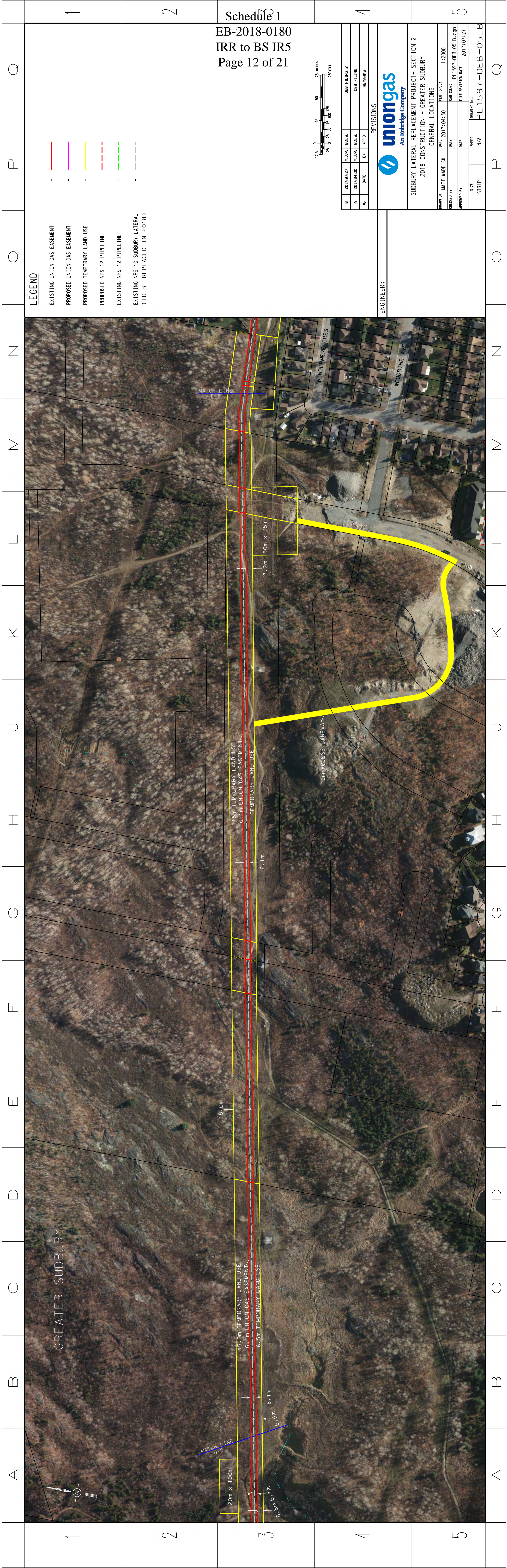
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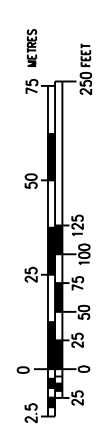
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- EXISTING UNION GAS EASEMENT
- PROPOSED UNION GAS EASEMENT
- PROPOSED TEMPORARY LAND USE
- PROPOSED NPS 12 PIPELINE
- EXISTING NPS 12 PIPELINE
- EXISTING NPS 10 SUBDURY LATERAL (TO BE REPLACED IN 2018)



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2018 CONSTRUCTION - GREATER SUDBURY
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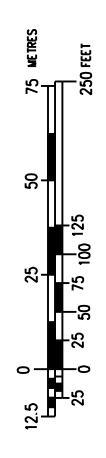
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- EXISTING UNION GAS EASEMENT
- PROPOSED UNION GAS EASEMENT
- PROPOSED TEMPORARY LAND USE
- PROPOSED NPS 12 PIPELINE
- EXISTING NPS 12 PIPELINE
- EXISTING NPS 10 SUBDURY LATERAL (TO BE REPLACED IN 2018)



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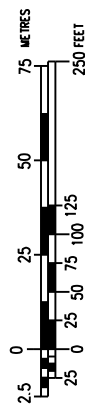


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LEGEND

- EXISTING UNION GAS EASEMENT
- PROPOSED UNION GAS EASEMENT
- PROPOSED TEMPORARY LAND USE
- PROPOSED NPS 12 PIPELINE
- EXISTING NPS 12 PIPELINE
- EXISTING NPS 10 SUBURBY LATERAL (TO BE REPLACED IN 2018)



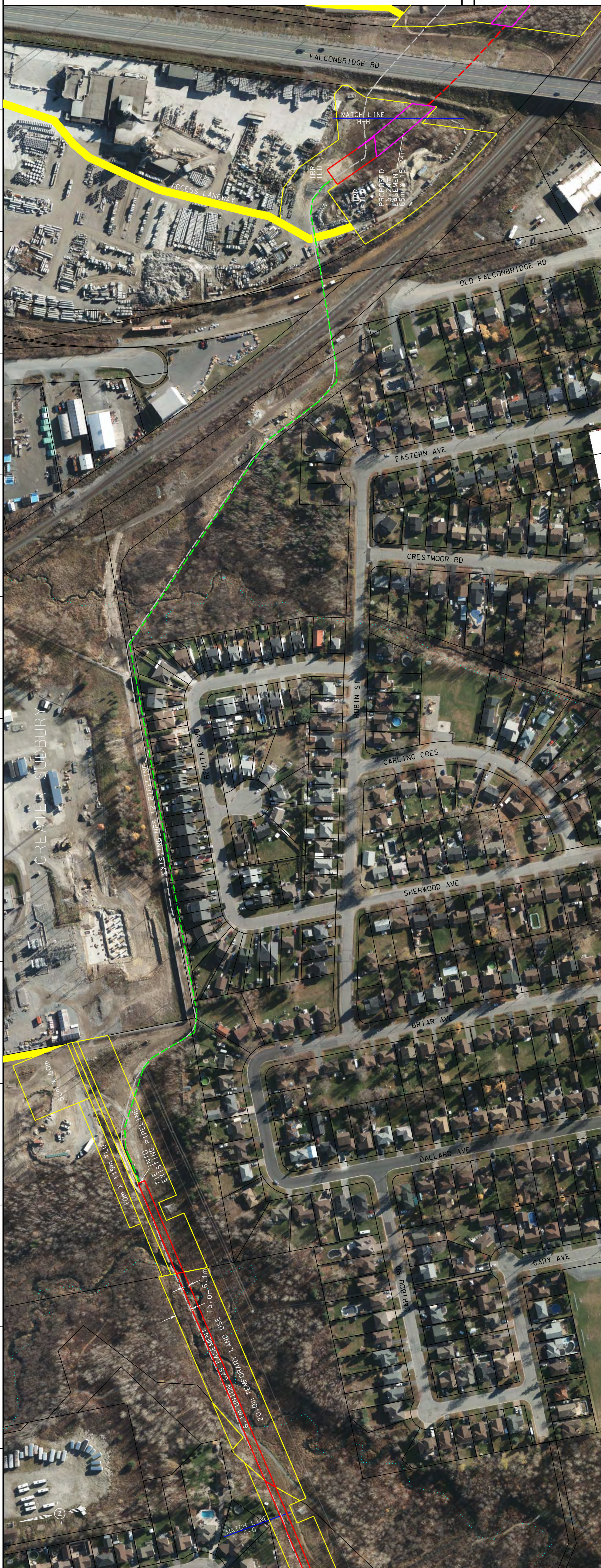
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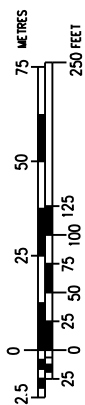
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2018 CONSTRUCTION - GREATER SUBURBY
GENERAL LOCATIONS

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LEGEND

- EXISTING UNION GAS EASEMENT
- PROPOSED UNION GAS EASEMENT
- PROPOSED TEMPORARY LAND USE
- PROPOSED NPS 12 PIPELINE
- EXISTING NPS 12 PIPELINE
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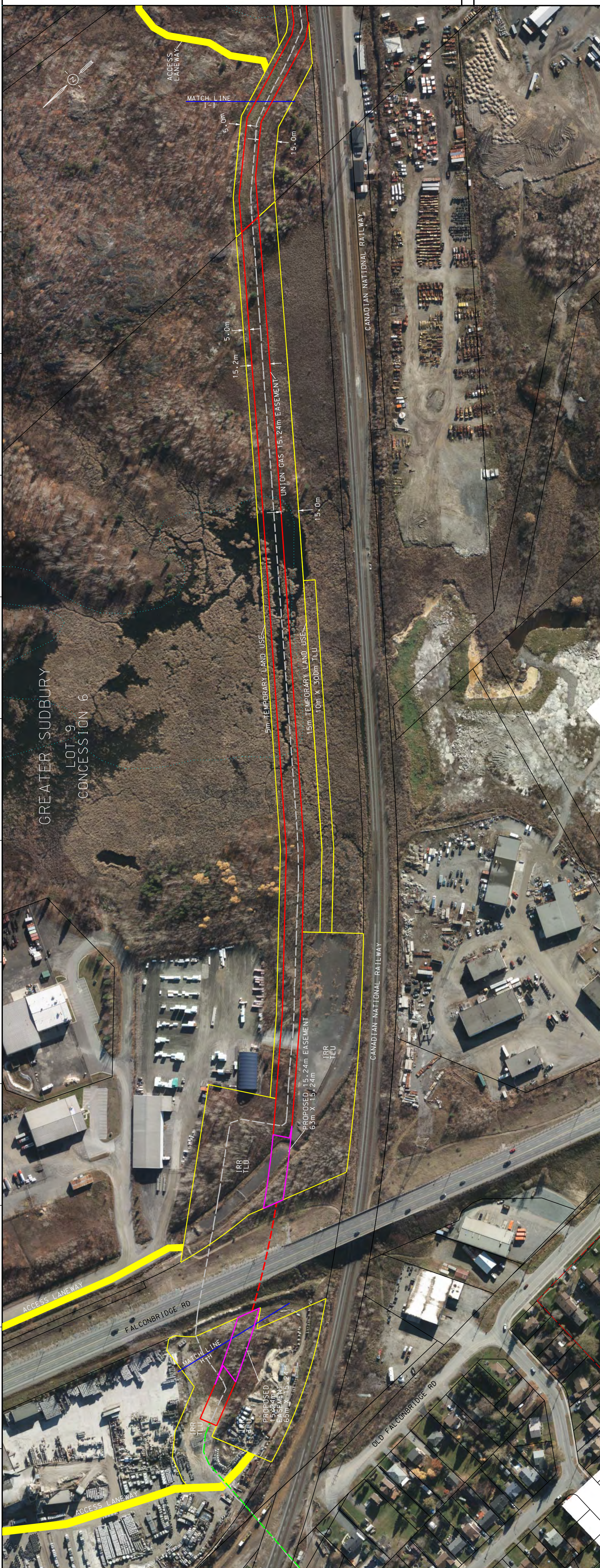
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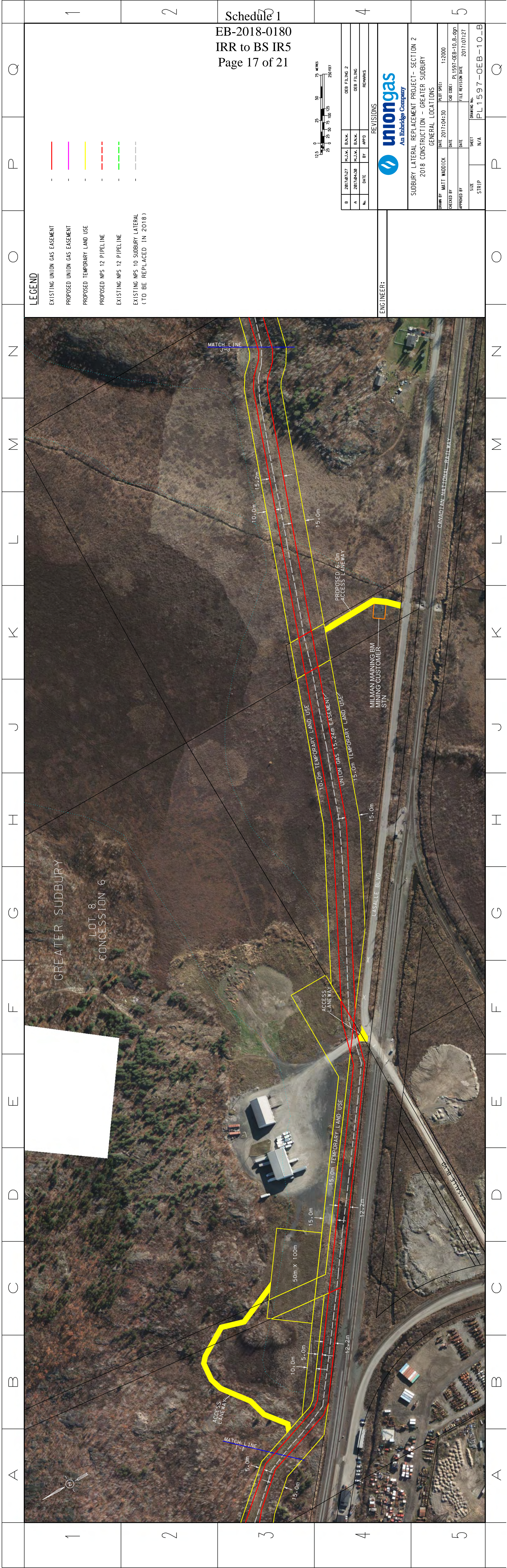
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2018 CONSTRUCTION - GREATER SUBURBY
GENERAL LOCATIONS

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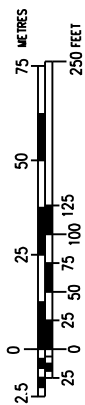




LEGEND

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- PROPOSED TEMPORARY LAND USE
- PROPOSED NPS 12 PIPELINE
- EXISTING NPS 12 PIPELINE
- EXISTING NPS 10 SUDBURY LATERAL (TO BE REPLACED IN 2018)

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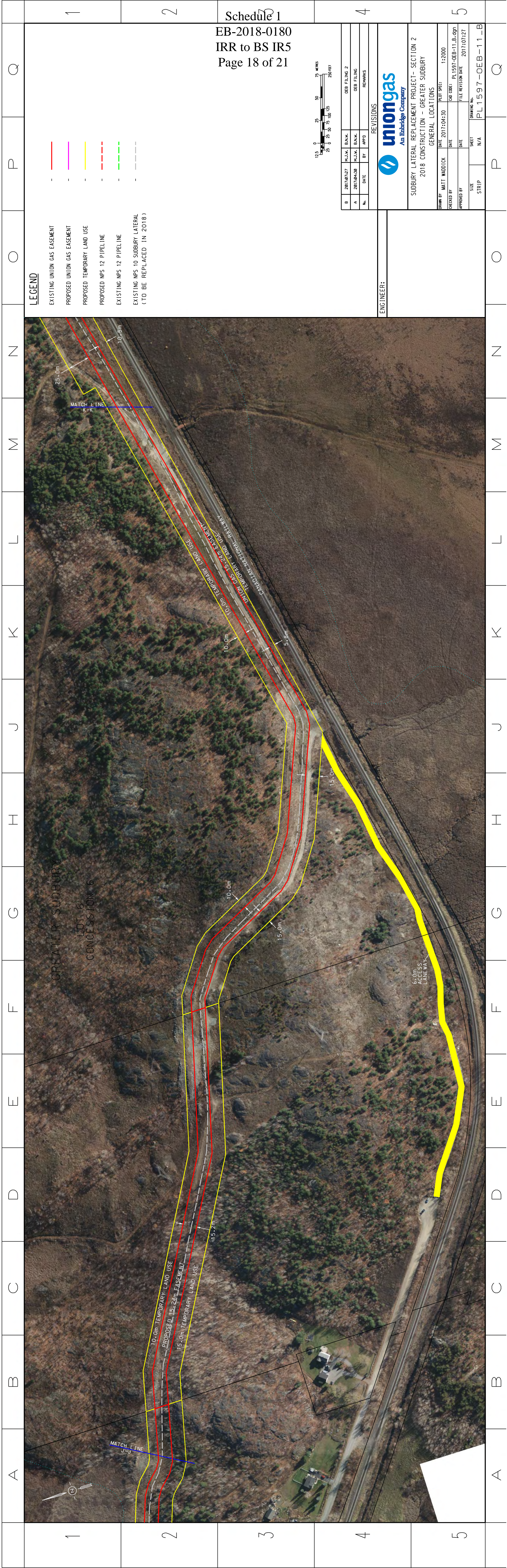
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SUDBURY LATERAL REPLACEMENT PROJECT- SECTION 2
2018 CONSTRUCTION - GREATER SUDBURY
GENERAL LOCATIONS

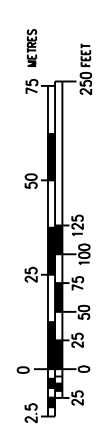
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LEGEND

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A	2017/04/20	M.J.M.	B.N.W.	OEB FILING
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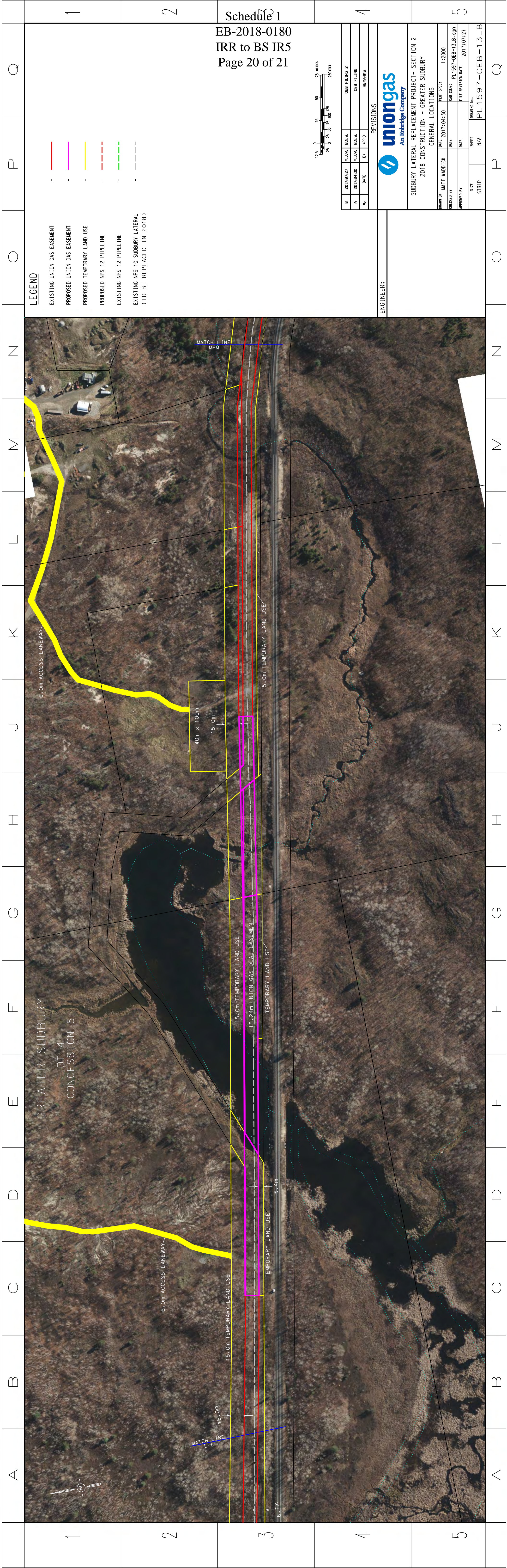
REVISIONS



SUDBURY LATERAL REPLACEMENT PROJECT- SECTION 2
2018 CONSTRUCTION - GREATER SUDBURY
GENERAL LOCATIONS

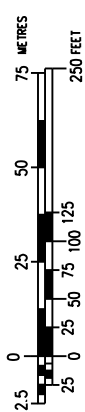
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LEGEND

- EXISTING UNION GAS EASEMENT
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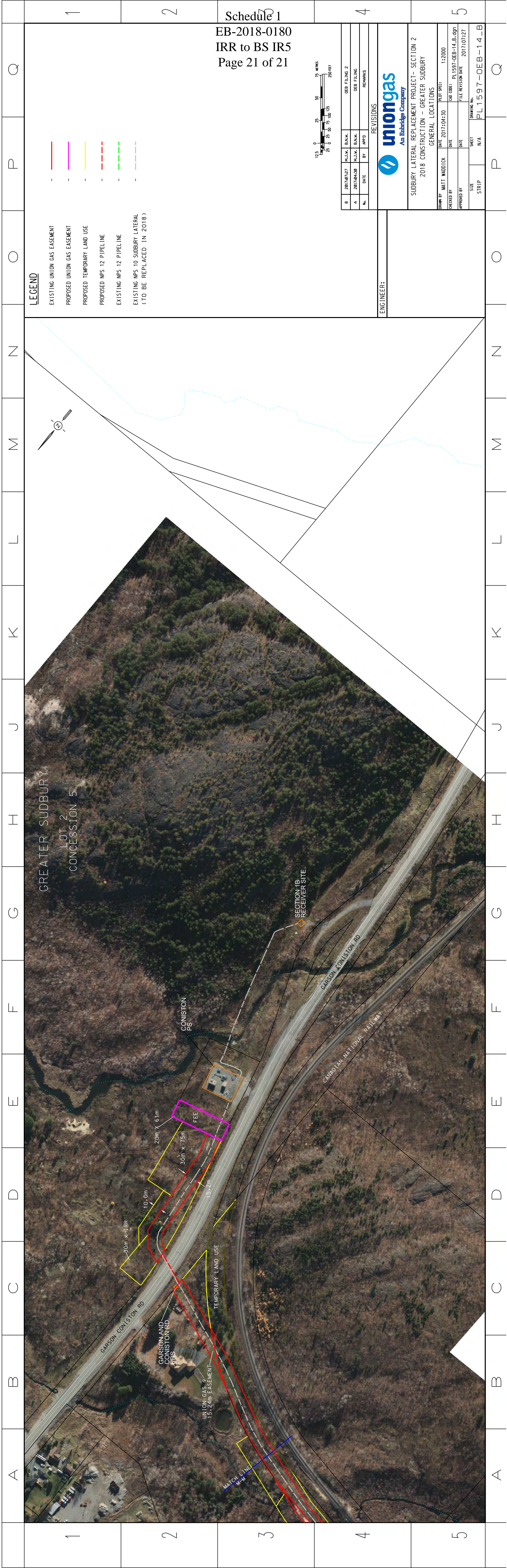
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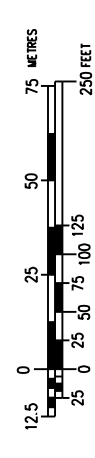
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LEGEND

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- EXISTING NPS 12 PIPELINE
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B	2017/07/27	M.J.M.	B.N.W.	OEB FILING 2
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UNION GAS LIMITED

Answers to Interrogatories from Board Staff

Interrogatory # 6

Ref: Evidence Schedule 13,” Letter by the Ministry of Energy to Union Gas, dated September 29, 2016”, Schedule 14 “Indigenous Consultation Report, 2018 Sudbury Replacement Project “

Preamble:

The 2016 edition of the OEB Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario (OEB Environmental Guidelines) sets out new streamlined procedures and protocols for Indigenous consultation and the duty to consult on natural gas pipeline projects that are subject to the OEB’s approval. Union Gas is required to adhere to these procedures and protocols and to file the required documentation with the OEB as part of its evidence in support of its application.

In a letter dated September 29, 2016 the Ministry of Energy stated that it “...is unable to make a definitive assessment as to whether or not the duty to consult is triggered...”

Questions:

- a) Please comment on the statement by the Ministry of Energy in Schedule 13 “...is unable to make a definitive assessment as to whether or not the duty to consult is triggered...” and indicate if there is any additional communication from the Ministry of Energy regarding the determination if the duty to consult is triggered and if the Ministry formally delegated the duty to consult to Union Gas.
- b) What other documents (related to the Duty to Consult delegation and environmental assessment) does Union Gas anticipate the Ministry will issue to Union Gas in accordance with the OEB Guidelines?
- c) What is the expected timing of Union Gas filing these documents with the OEB?
- d) Please provide an update on any Indigenous consultation undertaken since the application was filed. Identify any concerns raised in the consultation and describe how Union Gas is planning to address any concerns raised by First Nations and Métis affected by the proposed project.

Responses:

a) b) c)

Union provided the MOE with a copy of the Indigenous consultation report on April 26, 2017. In recent discussions with MOE, Union has been informed that the report is currently being reviewed and that Union will receive a letter from MOE in the next month. This letter will inform Union if there is a duty to consult, and provide MOE's comments regarding the consultation activities that Union has completed to date. Union also expects this letter to comment on the proposed consultation activities that Union is proposing to undertake between OEB approval and completion of construction.

d) Attached as Schedule 1 please find a copy of the Indigenous consultation log

2018 Sudbury Replacement Project

Summary of Consultation with First Nations and Métis Nation of Ontario

Purpose of consultation	Date	Contact method	Notes
Project Commencement	January 28, 2016	Email	Notified about the start of a new pipeline project, including the purpose, timing and location of the project, and solicited background information.
Information letters Ministry of Energy	September 14, 2016	Letter	notification of the project commencement and contact information
	September 29, 2016	Letter	received notice from MOEnergy fo the delegation fo communities to consult
Information sesssion #1	November 11, 2016	Letter	letters to inform of the open house for the communities, project description and meetings with project staff
informaton session #1	November 30, 2016	meeting	met with the Whitefish FN to review the project and discuss next steps
information session #1	December 1, 2016	meeting	met with the Region 5 of the MNO to review the project and discuss next steps
information session #1	December 1, 2016	email	wahnapiatae FN email to request copy of Shape files
information session #1	December 1, 2016	Email	North Channel Metis, follow up letter to request a meeting, copy of project description resent
contact #2	December 19, 2016	conference call	wahnapiatae FN Stefanie Recollect, Cheryl Recollect, Matt Waddick and wendy Landry discussion on area of project, shape files and action to follow up in march.
contact #2	December 23, 2016	email	Whitefish FN email from Robert Paishwagon request for more maps.
Atikameksheng Anishnawbek /Whitefish First Nation	November 30, 2016	In Person	Met with the Whitefish FN to review the project and discuss next steps
	December 23, 2016	email	Whitefish FN email from Robert Paishwagon request for more maps
	February 3, 2017	Email	Email regarding planning Open House in community
	February 10, 2017	Email	Atikameksheng Anishnawbek responded to email
	February 15, 2017	Email	Atikameksheng Anishnawbek email with regards to planning Open House dates set
	February 21, 2017	Email	Open House dates, email and follow up calls for logistical planning
	March 27, 2017	Email	Email regarding monitors and Open House dates. Response received same day
	March 30, 2017	Email	Email confirming dates of Open House
	May 10, 2017	In person	Open House completed in community. Great feedback
	May 12, 2017	Email	Email received with invoice for costs of Open House
	May 17, 2017	Email	Email sent with Monitor Agreement attached for the Enviromental Assessment work
	May 19, 2017	Email	Email received with contacts for monitors
	May 1, 2025	Email	Information on Community Job Fair sent, sponsorship sent to community
	June 19, 2017	Email	Email with regards to the job fair
	June 20, 2017	Phone Call	Returned phone call with regards to monitor WSIB coverage
	June 22, 2017	Email	Union Gas received Vendor code information with regards to WSIB
	June 15, 2017	Email	Informing on the donation of books being sent to community
	June 19, 2019	Email	Email confirming phone call
Wahnapiatae First Nation	December 1, 2016	Email	Email to request copy of Shape files
	December 19, 2016	Conference Call	Wahnapiatae FN Stefanie Recollect, Cheryl Recollect, Matt Waddick and wendy Landry discussion on area of project, shape files and action to follow up in march.
	February 21, 2017	Email	Email follow up on consultation plan
	February 22, 2017	Email	Read Receipt received from Stephanie Recollect
	March 10, 2017	Email	Email to Stephanie Recollect on the Feb. 21 request and follow up to reports and participation with monitor for field studies
	March 14, 2017	Email	Response email and update on monitors archeological study and map
	March 30, 2017	Phone Call	Call to discuss Open House planning
	April 4, 2017		Wahnapiatae First Nation requests an Open House in the community explaining project and information
	April 10, 2017	Emails	Three emails exchanged in Open House planning
	May 8, 2017	Email	Email on planning Open House
	May 17, 2017	Email	Completed Monitoring Agreement returned to Union Gas
	May 18, 2017	Email	Safety information and requirements sent to First Nation
	June 13, 2017	Email	Email planning of Open House and logistics
	June 14, 2017	Emails	Three emails about clrification on times for Open House
	June 19, 2017	In Person	Open House held in community. Many people attended. Great interest and questions.
Metis Nation of Ontario	July 19, 2017	Email	Email following up on the Open House and requesting invoice.
	December 1, 2016	In Person	Met with the Region 5 of the MNO to review the project and discuss next steps
	December 1, 2016	Email	North Channel Metis, follow up letter to request a meeting, copy of project description resent
	March 27, 2017		Written offer agreed and paid out, updates will be sent a sproject commences and EA reports to be forwarded once complete.
	April 19, 2017	Mail	Cheque for consultation sent to Sudbury Metis Council. Cashed on April 24
	April 28, 2017	Mail	Cheque for consultation sent to North Bay Metis Council. Cashed on June 1
	May 30, 2017	Mail	Cheque for consultation sent to Mattawa Metis Council. Cashed on June 7

UNION GAS LIMITED

Answers to Interrogatories from Board Staff

Interrogatory # 7

Ref: Evidence page 13, paragraph 55 “Environmental”, Schedule 8, “2018 Sudbury Replacement Project: Environmental Report”

Preamble:

An Environmental Report (ER) was prepared by AECOM on behalf of Union Gas. The ER was completed in accordance to with OEB Environmental Guidelines. The ER was provided to members of the Ontario Pipeline Coordinating Committee (OPCC) for review and comments on April 13, 2017. So far, no comments from the OPCC review are included in the evidence.

Question:

Please file a summary of comments and concerns received from the public consultation and the OPCC review, as well as Union Gas’ responses and planned actions to mitigate each of the issues and address each of the concerns.

Response:

Attached as Schedule 1, is a summary of the comments received as part of the OPCC review. The actual letters received by Union and Union’s response to these concerns are also included.

SCHEDULE 1

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SUMMARY OF OPCC COMMENTS

Stakeholder	Comment Summary	Response Date / Method	Response Summary
Joseph Vecchiolla , Ministry of Infrastructure (MOI) Phone Call on April 19, 2017	Noted USB with the Environmental Report (ER) was missing from the letter sent April 13, 2017.	Jessalyn Oke, AECOM Email dated April 19, 2017 Letter mailed April 19, 2017	Provided a web link to the online version of the ER and mailed a copy of the ER on a USB.
Joseph Vecchiolla , Ministry of Infrastructure (MOI) Email dated April 20, 2017	Unable to access the ER at the web link provided.	Jessalyn Oke, AECOM Email dated April 20, 2017	Explained that the document is large and takes a few minutes to open. Requested they try again.
Joseph Vecchiolla , Ministry of Infrastructure (MOI) Email dated April 20, 2017	Confirmed access to ER at the web link provided.	No response required.	Comment noted.
Michael Allen , ACK Architects on behalf of Butera Property Holdings Inc. Jennifer Ricci cc'd Email dated April 20, 2017	Requested an electronic copy of the ER.	Jessalyn Oke, AECOM Email dated April 20, 2017	Provided a web link to the online version of the ER.
Michael Allen , ACK Architects on behalf of Butera Property Holdings Inc. Jennifer Ricci cc'd Email dated April 20, 2017	Thanked the Project Team for the timely response.	No response required.	Comment noted.
Daniel Barrette , Rainbow Routes Association Email dated April 21, 2017	Confirmed receipt of the ER.	No response required.	Comment noted.

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Paige Campbell, Ministry of Tourism, Culture and Sport (MTCS) Email dated April 25, 2017	Requested a reduced file sized copy of the Stage 1 Archaeological Assessment.	Jessalyn Oke, AECOM Secure file transfer dated May 1, 2017	The followings reports were provided: Stage 1 Archaeological Assessment, Cultural Heritage Report and the corresponding MTCS acceptance letters for each report.
Kerry Whitney, Sudbury District Ministry of the Environment and Climate Change (MOECC) Email dated April 27, 2017	Noted USB with the ER was missing from the letter sent April 13, 2017.	Jessalyn Oke, AECOM Email dated April 28, 2017	Provided a web link to the online version of the ER and mailed a copy of the ER on a USB.
Paige Campbell, MTCS Email dated May 1, 2017	Confirmed receipt of the reports.	No response required.	Comment noted.
Sudbury Bible Fellowship Letter returned on May 8, 2017	The April 13, 2017 letter inviting landowners to review the ER was returned to AECOM. It was returned due to an unknown mailing error.	Jessalyn Oke, AECOM Emailed dated May 8, 2017	An alternate mailing address was unavailable. The letter was re-sent via email.
Gold Rush Trucking Inc., Letter returned on May 8, 2017	The April 13, 2017 letter inviting landowners to review the ER was returned to AECOM. It was returned due to an unknown mailing error.	Jessalyn Oke, AECOM Re-mailed May 8, 2017	An alternate mailing address was found and the letter was re-mailed.

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Wahnapiatae FN Comment received at Open House on May 10, 2017	Union Gas and AECOM met with the community to discuss the Project. Seven (7) community members signed in to the event. One individual asked how the Project considers the agency of the earth and water.	Jessalyn Oke, AECOM Email dated May 29, 2017	Explained that the agency of the earth and water was considered through the various environmental components assessed in the ER, prepared in accordance with the Ontario Energy Board Environmental guidelines. Provided a web link to the online version of the ER.
Environmental Assessment Program, Ontario Region, Transport Canada (TC) Email dated May 11, 2017	Proponents are asked to self-assess their project to determine if an interaction with a federal property / waterway will occur or if an approval or authorization under Acts administered by TC are required.	The email received from Transport Canada is a standardized email provided to all proponents upon receipt of a project notification. No response required.	Comment noted.
Jeff Elkow, MTCS Email dated June 20, 2017	Acknowledged the April 13, 2017 letter and requested a copy of the ER for review and comment.	Faranak Amirsalari, AECOM Email dated June 22, 2017	Provided a web link to the online version and inquired whether a hard copy is needed. Also identified other individuals at the MTCS that have been involved on the Project.
Dan Minkin, MTCS Email June 26, 2017	Provided MTCS review comments on the ER.	Jessalyn Oke, AECOM Email dated June 27, 2017	Requested the MTCS resend their review comments. Attachment was missing from the email.

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Dan Minkin, MTCS Email June 27, 2017	When a proposed undertaking impacts land identified as requiring archaeological fieldwork, this fieldwork should, to the greatest extent possible, be carried out during the environmental assessment process so that its results can inform the evaluation of alternatives.	Jessalyn Oke, AECOM Email dated June 27, 2017	Thanked the MTCS for their comment. Noted that the Stage 2 archaeological investigation is underway and that a report would be provided to the MTCS once available.
Faranak Amirsalari, AECOM Email dated June 28, 2017	Followed-up on the June 22, 2017 email to confirm receipt.	Jeff Elkow, MTCS Email dated June 28, 2017	Confirmed that the online version of the ER was sufficient for the MTCS review.
Gold Rush Trucking Inc., Letter returned	The May 8, 2017 mailing of the April 13, 2017 letter inviting landowners to review the ER was returned to AECOM. It was returned due to an unknown mailing error.	No further follow-up completed.	Alternate mailing information was not available.

UNION GAS LIMITED

Answers to Interrogatories from Board Staff

Interrogatory # 8

Ref: Evidence page 12, paragraph 49

Preamble:

Union Gas stated that blasting and/or hoe-ramming is expected to be required and dewatering of swamps or wet areas may also be required.

Questions:

- a) Discuss the regulatory safety requirements and procedures that Union Gas will have to follow in the event of blasting during construction of the Project.
- b) Referring to the photomosaic route maps in the evidence please identify the locations of areas where blasting may be required.
- c) Describe the measures that Union Gas will take to ensure safety of affected locations.
- d) Regarding dewatering of swamps and wet areas describe the requirements that will have to be followed and identify agencies or other authorities that Union Gas will have to contact to obtain permits.

Responses:

- a) Union Gas will follow the Ontario Provincial Standards: Specification, OPSS.MUNI 120 General Specification for the Use of Explosives; Ontario Provincial Standard Specification, OPSS.ROV 120 General Specification for the Use of Explosives; and Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters.

In addition to those Provincial Standards Union Gas also has the following procedures and specifications that it will use to plan any blasting work: Construction and Maintenance Manual Section 12.6, Blasting Close to Gas Pipelines, Construction and Maintenance Manual Section 17.11, Blasting Information Request, Construction Specification 06, Trenching and Excavation, Construction Specification 07, Rock Excavation.

The above documents will direct Union Gas to hire a Blasting Consultant to work with and manage the Contractor who must develop a Blasting Plan which defines the approach toward any blasting. The Blast Plan will be reviewed and approved by Union's Blasting Consultant. The blast plans will incorporate the following elements: pre and post blast survey for all buildings and structures within 150 metres of the blast area, controlled blasts, monitoring of all blasts to ensure all blast effects remain within set parameters (ground vibrations and air loudness). A hydrologist will be retained that will use geotechnical data to determine the extent of well monitoring in the area around the blast work zone.

- b) The area of rock excavation that may be completed by blasting is the majority of the section of pipe between Walden and Azilda, totaling approximately 7.5 km. While there is the possibility for blasting between Coniston and Frood no specific location has been identified in the engineering design.
- c) Please see Union's response to Board Staff interrogatory 8 a).
- d) Union Gas will obtain all necessary permits from Conservation Sudbury, The Ministry of Natural Resources and Forestry, and The Ministry of Environment and Climate Change to allow for the dewatering of swamps and wet areas.

UNION GAS LIMITED

Answers to Interrogatories from Board Staff

Interrogatory # 9

Ref: Evidence page 1, paragraph 1

Union Gas applied for leave to construct facilities under section 90(1) of the OEB Act. If Union Gas does not agree to any of the draft conditions of approval noted below, please identify the specific conditions that Union Gas disagrees with and explain why.

For conditions in respect of which Union Gas would like to recommend minor changes, please provide the proposed changes.

Responses:

Union can accept the proposed conditions of approval