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May 1, 2019

Sent By Electronic Mail, RESS Electronic Filing and Courier

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

Dear Ms. Walli:

Re: EPCOR Natural Gas Limited Partnership (“ENGLP”) Southern Bruce Project EB-2018-0263 Leave to Construct Application – ENGLP Responses to Interrogatories

Pursuant to Procedural Order No. 1 in the above noted proceeding, EPCOR Natural Gas Limited Partnership (“**ENGLP**”) hereby submits its responses to interrogatories from OEB Staff, Enbridge Gas Inc. and Industrial Gas Users Association.

Please do not hesitate to contact me if you have any questions.

Sincerely,

[Original signed by]

Bruce Brandell
Director, Commercial Services
EPCOR Utilities Inc.
bbrandell@epcor.com
(780) 412-3720



Interrogatory 1:

Reference: Exhibit A, Tab 2, Schedule 1, page 2
Exhibit A, Tab 5, Schedule 1, page 3

Preamble: *“Based on its Common Infrastructure Plan (CIP) as filed in a competitive process in the South Bruce Expansion Applications, EPCOR Natural Gas Limited Partnership (EPCOR) was selected as the successful proponent to file for leave to construct (LTC) gas facilities in the Southern Bruce Municipalities¹.*

EPCOR has applied to the OEB for an Order granting LTC approximately 75 km of NPS 6 and 8-inch steel pipeline, 45 km of NPS 6-inch polyethylene pipeline and 178 km of NPS 2 and 4-inch polyethylene pipeline as well as six pressure regulating stations (Project) in the Municipality of Arran-Elderslie, the Municipality of Kincardine and the Township of Huron-Kinloss (Southern Bruce Municipalities). The 178 km of NPS 2 and 4-inch polyethylene pipeline is for distribution within the Southern Bruce Municipalities.”

Questions:

- (a) Please provide a chart that compares the CIP parameters as determined through the Staff Progress Report² and the Decision on Preliminary Issues and Procedural Order No. 8³ from the competitive process, with those same parameters that now underpin this application. For example, compare the number of communities to be served as determined through the CIP parameters with the number of communities to be served in this application, the construction schedule filed in the CIP with the construction schedule included in this application, etc. Please explain any differences and provide a reference for where in the application the relevant parameter can be found.
- (b) Please confirm that EPCOR is seeking leave to construct the 178 km of NPS 2 and 4-inch polyethylene pipeline for distribution within the Southern Bruce Municipalities.

¹EB-2016-0137/0138/0139

² Filed on July 20, 2017 in EB-2016-0137/0138/0139

³ EB-2016-0137/0138/0139



Responses:

(a) Table OEB 1-1 compares the CIP parameters as determined through the Staff Progress Report and the Decision on Preliminary Issues and Procedural Order No. 8 from the competitive process, with those same parameters that now underpin this application. In order to be helpful, EPCOR Natural Gas Limited Partnership (referred to as “ENGLP” in the application and these responses) has also included in the chart a detailed list of CIP parameters that were addressed in the Staff Progress Report and the Decision on Preliminary Issues and Procedural Order No. 8 but are outside the scope of this Application and are properly dealt with in ENGLP’s Rate Application (EB-2018-0264). In those cases a reference to that application has been provided for informational purposes only.

Table OEB 1- 1: CIP Parameters

	Col. 1	Col. 2	Col. 3
	Parameter	Description	Reference in Application
1	CRITERIA EPCOR HELD TO		
2	Cumulative 10-Year Revenue Requirement per Unit of Volume	\$0.2209/m ³	EB-2018-0264 ⁴
3	Customer Years	42,569 Customer Years	EB-2018-0264
4	Cumulative 10-Year Throughput Volume	342,186,741 m ³	EB-2018-0264
5			
6	PARAMETERS That Form Basis of CIP Economics		
7	Communities To Be Served	Chesley, Inverhuron, Paisley, Tiverton, Kincardine, Lucknow, Lurgan Beach, Point Clark, Ripley, Bruce Energy Centre Industrial Park	Parameter met. See Exhibit A, Tab 3, Schedule 2 for map of system
8	Construction Schedule	Gas mains to communities served to be constructed within two years from commencement of construction	Gas main parameter has been impacted by approximately 11 months due to change in common assumption regarding OEB timelines impacting construction schedule. See Exhibit A, Tab 6, Schedule 2 for schedule as of February 2019. For most current schedule please see below.

⁴ EB-2018-0264 is ENGLP’s Rate Application for the Southern Bruce utility. Items in the chart that reference the rate application are addressed in the rate application and generally not in this leave to construct.



Col. 1	Col. 2	Col. 3	
Parameter	Description	Reference in Application	
9	10-Year Forecast Horizon	10-year rate stability period	Parameter met. EB-2018-0264 Exhibit 1.2.1 / 10.1
10	Capital Costs	Any capital cost overruns incurred during first 10-years would not be permitted in rate base for year 11 and beyond	Parameter met. EB-2018-0264 Exhibit 1.2.1 / 2.8
11	Revenue Requirement	Gross revenue requirement over the rate stability period associated with the distribution system as detailed in EPCOR's CIP	Parameter met. EB-2018-0264 Exhibit 1.2.1, 3, Exhibit 3, Exhibit 6
12	OM&A Costing Methodology	Base OM&A cost estimates on fully allocated costs	Parameter met. EB-2018-0264 Exhibit 1.2.1, Exhibit 4.3
13	Service Levels	Plan for operations and maintenance that would meet service levels identified in the Gas Distribution Access Rules	Parameter met. EB-2018-0264 Exhibit 1.2.1
14	Other CIP Parameters	Royalty payments to municipalities excluded if not recovered through revenue requirement	Parameter met. EB-2018-0264 No royalty paid to municipalities
15	Capital Structure	Use Union's approved deemed debt/equity ratio	Parameter met. EB-2018-0264 Exhibit 1.2.1, Exhibit 5
16			
17	COMMON ASSUMPTIONS To Allow Board to Compare CIPs		
18	Customer Consumption	Common consumption levels for each mass market segment, except for large commercial or industrial	Parameter met. EB-2018-0264 Exhibit 1.2.1, Exhibit 3.2
19	Construction Schedule	Timelines for OEB decisions	Parameter impacted due to delay in timelines. See revised schedule below and OEB Interrogatory 11a).
20	Government Grants / Municipal Contributions and Aid to Construction	Excluded from CIP	Parameter met. EB-2018-0264 Exhibit 3.2.3
21	Demand Side Management	Excluded from CIP	Parameter met. EB-2018-0264 Exhibit 3.2.3, Exhibit 4.6
22	Cap and Trade Costs	Excluded from CIP	Parameter met. EB-2018-0264 Exhibit 3.2.3
23	Gas Commodity Costs	Excluded from CIP	Parameter met EB-2018-0261 Exhibit 1.2.1
24	Depreciation Rates	Use depreciation rates based on Union's OEB approved rates	Parameter met. EB-2018-0264 Exhibit 4.4
25	Taxes	Use common tax rates. Exclude tax holidays from municipalities	Parameter met. EB-2018-0264 Exhibit 4.5
26	Interest During Construction	Use OEB prescribed rate	Parameter met. EB-2018-0264 Exhibit



Col. 1	Col. 2	Col. 3
Parameter	Description	Reference in Application
		1.2.1
27	Upstream Reinforcement Excluded from CIP	Parameter met. EB-2018-0264 Exhibit 2.8.1
28	Inflation Costs Use same inflation rate	Parameter met. EB-2018-0264 Exhibit 1.2.1



(b) ENGLP is seeking approval for the 75 km of high pressure pipe and 45 km of MDPE pipe forming the backbone of the system. ENGLP is not seeking approval of the referenced 178 km as it is distribution piping that may be constructed pursuant to ENGLP's Certificates of Public Convenience and Necessity, for which leave to construct is not required. ENGLP described the 178 km within its application in order to provide a fulsome description of the overall activities/infrastructure.



Interrogatory 2:

Reference: Exhibit A, Tab 2, Schedule 1, page 4

Preamble: *“EPCOR will enter into franchise agreements with the County of Bruce, the County of Grey, the Municipality of Arran-Elderslie, the Municipality of Brockton, the Municipality of Kincardine, the Municipality of West Grey, the Township of Chatsworth and the Township of Huron-Kinloss. All proposed franchise agreements are based on the Board’s Model Franchise Agreement.”*

Question:

Has (or will) EPCOR entered into any other agreements with the Southern Bruce Municipalities?
If so, please describe the nature of the agreements

Responses:

- (a) ENGLP has no other agreements and has no plans to enter into any other agreements with the Southern Bruce Municipalities.



Interrogatory 3:

Reference: Exhibit A, Tab 3, Schedule 1, Page 6
Exhibit A, Tab 3, Schedule 2, Page 1
EB-2016-0137|-0138|-0139 EPCOR CIP Application, Schedule B, Pages 2 to 9

Preamble: *“Following the comparative evaluation, outlined in the Environmental Report, the preliminary preferred route was confirmed as the Preferred Route as shown in Tab 3, Schedule 2.”*

Questions:

- (a) Please confirm that the Preferred Route as shown in Tab 3, Schedule 2 is identical to that proposed in the CIP. If it is not, please identify and explain the reasons for any differences.

- (b) Please confirm that EPCOR’s distribution pipeline routes remain identical to the routes proposed in the CIP

Responses:

- (a) ENGLP confirms that the Preferred Route as shown in Tab 3, Schedule 2 is identical to that proposed in the CIP.

- (b) ENGLP confirms that the distribution pipeline routes remain identical to the routes proposed in the CIP.



Interrogatory 4:

Reference: Exhibit A, Tab 3, Schedule 1, pages 6 and 7
Exhibit A, Tab 10, Schedule 3, pages 1-5

Preamble: *“EPCOR provided a list of entities with whom land easements and necessary agreements will be coordinated and negotiated. However, the list does not identify with which entities land easements may be required.*

EPCOR identified 17 properties that could be directly affected by construction of the pipeline and associated facilities.”

Questions:

- (c) In tabular form, please identify with which of the entities listed in Exhibit A, Tab 3, Schedule 1 land easements may be required, the nature of the easement (permanent or temporary), and the status of negotiations.
- (d) Has the number of potentially affected properties changed from 17 since EPCOR filed the Application? If so, please provide an updated list of properties in redacted (for the record) and non-redacted forms. For each property, please identify whether the land is to be purchased, or a temporary or permanent easement is required.
- (e) Please provide an update on the status of land use negotiations with potentially affected property owners.
- (f) Please provide a table that lists all permits and approvals that are required to complete the construction of the project, including a description of the purpose or need for each permit and the status of each permit/approval application. Please also provide dates for when EPCOR expects to receive any outstanding permits/approvals required, and what impact any delays in receiving these might have on the schedule.

Responses:

- (c) Table OEB-4-1 below provides an update to the entities listed in Exhibit A, Tab 3, Schedule 1 that includes the land easements required and the nature of the easement as well as the status of negotiations.



(d) The number of potentially affected properties has changed from 17 to 38 since ENGLP filed the Application. Please note that 9 properties are identified as alternatives if the preferred option cannot be secured. Table OEB-4-2 includes the additional properties that have been identified with all the information requested.

(e) Please refer to Table OEB-4-3 as it contains a summary of the status of negotiations. There has not been any negative feedback or comments from any landowners that ENGLP has spoken to. Only one landowner to date is not interested in providing temporary pipe storage for the Project. ENGLP has already secured an alternative temporary pipe storage area.

(f) Please refer to Table OEB-4-4 below.

Table OEB 4- 1

Section	ID	PIN	Registered Owner(s)	Address for Service (Owners)	Encumbrancers	Address for Service (Encumbrancers)	Land Easement Required?	Status of negotiations
4.2	-	-	-	-		-	land not required	
1.3	C	33186-0436	[REDACTED]	[REDACTED]		n/a	Purchase-fee simple	Not contact yet
	C1	33187-0013	[REDACTED]	[REDACTED]	2 mtgs in favour of: St. Stanislaus – St. Casimir’s Polish Parishes Credit Union Limited	220 Roncesvalles Avenue, Toronto ON M6R 2L7	Purchase-fee simple: Alternative if C cannot be acquired.	Not contact yet
	C2	33187-0010	[REDACTED]	[REDACTED]	Mtg in favour of:	Suite 200 – 1133 St. George	Purchase-fee simple: Alternative	Not yet contacted





Section	ID	PIN	Registered Owner(s)	Address for Service (Owners)	Encumbrancers	Address for Service (Encumbrancers)	Land Easement Required?	Status of negotiations
				[REDACTED]	Farm Credit Canada	Boulevard, Moncton, New Brunswick E1E 4E1	if C cannot be acquired.	
1.4	-	33182-0127	The Trustees of the Vesta Congregation of the Methodist Church	The Presbyterian Church in Canada 50 Wynford Drive Toronto, ON M3C 1J7 Canada - The United Church of Canada 3250 Bloor Street West, Suite 200 Toronto ON M8X 2Y4		n/a	Purchase-Fee Simple	Not yet contacted
1.5	P	33181-0760	[REDACTED]	[REDACTED]		n/a	Purchase-Fee Simple	Not yet contacted



Section	ID	PIN	Registered Owner(s)	Address for Service (Owners)	Encumbrancers	Address for Service (Encumbrancers)	Land Easement Required?	Status of negotiations
	P1	33189-0094				n/a	Purchase-fee simple: Alternative if P cannot be acquired.	Not yet contacted
	P2	33189-0017	Calalan Farms Ltd.	1050 Greenock-Brant, Cargill ON N0G 1J0		n/a	Purchase-fee simple: Alternative if C cannot be acquired.	Not yet contacted
1.6	-	33290-0035				n/a	Not required	
1.7	T1	33293-0003	1210987 Ontario Inc.	44221 Bridge Road, R.R.#5 Seaforth ON N0K 1W0	Mtg in favour of: The Toronto-Dominion Bank	56 Main Street South, P.O. Box 520, Seaforth ON N0K 1W0	Purchase-Fee Simple	Not yet contacted
	T2	33287-0130					Purchase-fee simple: Alternative if T1 cannot be acquired.	Not yet contacted
1.8	-	33286-0162	BEC Business & Innovation	1-2351 Huron Street,	Mtg in favour of:	1-2351 Huron Street,	Purchase-Fee	Not yet contacted



Section	ID	PIN	Registered Owner(s)	Address for Service (Owners)	Encumbrancers	Address for Service (Encumbrancers)	Land Easement Required?	Status of negotiations
			Centre Inc.	DANCOR Campus, London ON N5V 0A8	Huron Bio-Energy Inc.	DANCOR Campus, London ON N5V 0A8	Simple	
1.9	I	33293-0134	The Corporation of the Township of Kincardine	Municipality of Kincardine 1475 Concession 5, Kincardine ON N2Z 2X6		n/a	Purchase-Fee Simple	Not yet contacted
	alt 1	33293-0193	The Corporation of the Municipality of Kincardine	Municipality of Kincardine 1475 Concession 5, Kincardine ON N2Z 2X6		n/a	Purchase-fee simple: Alternative if I cannot be acquired.	Not yet contacted
	alt 2	33293-0182	The Corporation of the Township of Kincardine	Municipality of Kincardine 1475 Concession 5, Kincardine ON N2Z 2X6		n/a	Purchase-fee simple: Alternative if I cannot be acquired.	Not yet contacted
	alt 3	33293-0026				n/a	Purchase-fee simple: Alternative if I cannot	Not yet contacted



Section	ID	PIN	Registered Owner(s)	Address for Service (Owners)	Encumbrancers	Address for Service (Encumbrancers)	Land Easement Required?	Status of negotiations
			[REDACTED] [REDACTED]	[REDACTED]			be acquired.	
1.10	K 1	33303-0194	West Ridge on the Lake Inc.	100 Hunter Valley Road, Orillia ON L3V 6H2	Easement: KN15145 in favour of The Hydro-Electric Power Commission of Ontario (now known as Hydro One)	Hydro One Networks Inc. 483 Bay Street, South Tower, 8 th Floor Reception, Toronto ON M5G 2P5	Purchase-fee simple	Not yet contacted
	K 2 & K 3	33303-0866	Ontario Peninsula Farms Ltd.	c/o Nott Farms (Ont.) Ltd., R.R.#4, Clinton ON N0M 1L0		N/a - See notes	Purchase-fee simple: Alternative if K1 cannot be acquired.	Not yet contacted



Table OEB 4- 2

TRACT ID	INFRASTRUCTURE TYPE	PHASE	STATION NAME	SITE ID	SITE TYPE	PIN	LANDOWNER	LANDOWNER CONTACT	CIVIC ADDRESS	OWNERS ADDRESS	AGREEMENT TYPE	AGREEMENT STATUS
8	VALVE SITE	1	N/A	V52	PREFERRED	33290	[REDACTED]	Phone: E-mail: Fax:	N/A	N/A	PURCHASE - FEE SIMPLE	NOT YET CONTACTED
9	PIPE STORAGE AREA	1	N/A	PSA1	PREFERRED	33183-0177	TURUSS (CANADA) [REDACTED]	Name: Jamie Higston, Plant Manager Phone: 519-379-5408 E-mail: Fax:	60 QUEEN STREET NORTH CHESLEY ON, NOG 1L0	60 QUEEN STREET NORTH CHESLEY ON, NOG 1L0	WORK SPACE AREA	LANDOWNER NOT INTERESTED
10	PIPE STORAGE AREA	1	N/A	PSA2	PREFERRED	33290-0030	SNAKE CREEK FARMS LTD.,	Name: Taun Frosst Phone: 226-930-1511 E-mail: sunset.taun@gmail.com Fax:	1895 BRUCE ROAD 20 TIVERTON ON NOG 2T0	N/A	WORK SPACE AREA	AGREEMENT REACHED
11	TEMPORARY LAND USE AREA	1	N/A	TL1	PREFERRED	37187-0052	PUBLIC AUTHORITY HAVING JURISDICTION;	Phone: E-mail: Fax:	N/A	N/A	WORK SPACE AREA	NO AGREEMENT REQUIRED
12	TEMPORARY LAND USE AREA	1	N/A	TL2	PREFERRED	37188-0163	[REDACTED]	Phone: [REDACTED] E-mail: Fax:	N [REDACTED] H 3K0	[REDACTED] 1L0	WORK SPACE AREA	NEGOTIATIONS IN PROGRESS
13	TEMPORARY LAND USE AREA	1	N/A	TL3	PREFERRED	37188	[REDACTED]	Phone: [REDACTED] E-mail: Fax:	N/A	[REDACTED] 1L0	WORK SPACE AREA	AGREEMENT REACHED
14	TEMPORARY LAND USE AREA	1	N/A	TL4	PREFERRED	37216-0051	PUBLIC AUTHORITY HAVING JURISDICTION;	Phone: E-mail: Fax:	N/A	N/A	WORK SPACE AREA	NO AGREEMENT REQUIRED
15	TEMPORARY LAND USE AREA	1	N/A	TL5	PREFERRED	33186	[REDACTED]	Phone: [REDACTED] E-mail: Fax:	[REDACTED] SPACE AREA	[REDACTED]	SPACE AREA	NEGOTIATIONS IN PROGRESS
16	TEMPORARY LAND USE AREA	1	N/A	TL6	PREFERRED	33187	[REDACTED]	Phone: E-mail: Fax:	[REDACTED]	[REDACTED] 1L0	WORK SPACE AREA	AGREEMENT REACHED
17	TEMPORARY LAND USE AREA	1	N/A	TL7	PREFERRED	33182	[REDACTED]	Phone: E-mail: Fax:	[REDACTED]	[REDACTED] A	WORK SPACE AREA	AGREEMENT REACHED



Table OEB 4- 3

TRACT ID	INFRASTRUCTURE TYPE	PHASE	STATION NAME	SITE ID	SITE TYPE	PIN	LANDOWNER	LANDOWNER CONTACT	CIVIC ADDRESS	OWNERS ADDRESS	AGREEMENT TYPE	AGREEMENT STATUS
18	TEMPORARY LAND USE AREA	1	N/A	TL8	PREFERRED	33188	[REDACTED]	Phone: E-mail: Fax:	[REDACTED]	N/A	WORK SPACE AREA	AGREEMENT REACHED
19	TEMPORARY LAND USE AREA	1	N/A	TL9	PREFERRED	33181-0767	THE CORPORATION OF THE COUNTY OF BRUCE;	Phone: E-mail: Fax:	N/A	N/A	WORK SPACE AREA	NEGOTIATIONS IN PROGRESS
20	TEMPORARY LAND USE AREA	1	N/A	TL10	PREFERRED	33290	[REDACTED]	Phone: (C) E-mail: Fax:	N/A	[REDACTED] SPACE AREA	WORK SPACE AREA	AGREEMENT REACHED
21	TEMPORARY LAND USE AREA	1	N/A	TL11	PREFERRED	33238	[REDACTED]	Phone: E-mail: Fax:	[REDACTED]	N/A	WORK SPACE AREA	NOT YET CONTACTED
22	TEMPORARY LAND USE AREA	1	N/A	TL12	PREFERRED	33290	[REDACTED]	Phone: E-mail: Fax:	[REDACTED]	N/A	WORK SPACE AREA	NEGOTIATIONS IN PROGRESS
23	TEMPORARY LAND USE AREA	1	N/A	TL13	PREFERRED	33290-0030	SNAKE CREEK FARMS LTD.;	Name: Toun Frosst Phone: 226-930-1511 E-mail: sunset.taun@gmail.com Fax:	1895 BRUCE ROAD 20 TIVERTON ON N0G 2T0	N/A	WORK SPACE AREA	AGREEMENT REACHED
24	TEMPORARY LAND USE AREA	1	N/A	TL14	PREFERRED	33289	[REDACTED]	Phone: (C) E-mail: Fax:	[REDACTED]	N/A	WORK SPACE AREA	NEGOTIATIONS IN PROGRESS
25	TEMPORARY LAND USE AREA	1	N/A	TL15	PREFERRED	33289	[REDACTED]	Phone: E-mail: Fax:	N/A	N/A	WORK SPACE AREA	NEGOTIATIONS IN PROGRESS
26	TEMPORARY LAND USE AREA	1	N/A	TL16	PREFERRED	33283-0087	PUBLIC AUTHORITY HAVING JURISDICTION;	Phone: E-mail: Fax:	N/A	N/A	WORK SPACE AREA	NO AGREEMENT REQUIRED
27	TEMPORARY LAND USE AREA	1	N/A	TL17	PREFERRED	33283	[REDACTED]	Phone: E-mail: Fax:	N/A	N/A	WORK SPACE AREA	NOT YET CONTACTED



Table OEB 4- 4

TRACT ID	INFRASTRUCTURE TYPE	PHASE	STATION NAME	SITE ID	SITE TYPE	PIN	LANDOWNER	LANDOWNER CONTACT	CIVIC ADDRESS	OWNERS ADDRESS	AGREEMENT TYPE	AGREEMENT STATUS
28	TEMPORARY LAND USE AREA	1	N/A	TL18	PREFERRED	33287	[REDACTED]	Phone: 289-242-9645 E-mail: Fax:	[REDACTED]	[REDACTED]	WORK SPACE AREA	NEGOTIATIONS IN PROGRESS
29	STATION	2	TIVERTON	T1	PREFERRED	33293-0003	1210987 ONTARIO INC.	Phone: E-mail: Fax:	N/A	44221 BRIDGE ROAD RR5 SEAFORTH ON, N0K 1W0	PURCHASE - FEE SIMPLE	NOT YET CONTACTED
30	STATION	2	TIVERTON	T2	ALTERNATIVE	33287	[REDACTED]	Phone: E-mail: Fax:	N/A	[REDACTED]	PURCHASE - FEE SIMPLE	NO AGREEMENT REQUIRED
31	VALVE SITE	2	N/A	VS3	PREFERRED	33286-0162	BEC BUSINESS & INNOVATION CENTRE INC.;	Phone: E-mail: Fax:	N/A	1-2351 HURON STREET DANCOR CAMPUS LONDON ON, N5V 0A8	PURCHASE - FEE SIMPLE	NOT YET CONTACTED
32	STATION	2	INVERHURON	I1	PREFERRED	33293-0134	THE CORPORATION OF THE TOWNSHIP OF KINCARDINE;	Phone: E-mail: Fax:	N/A	MUNICIPALITY OF KINCARDINE 1475 CONCESSION 5 KINCARDINE ON N2Z 2X6	PURCHASE - FEE SIMPLE	NOT YET CONTACTED
33	STATION	2	INVERHURON	I1	ALTERNATIVE	33293-0193	THE CORPORATION OF THE MUNICIPALITY OF KINCARDINE;	Phone: E-mail: Fax:	653 BRUCE ROAD 23 KINCARDINE ON N2Z 2X6	MUNICIPALITY OF KINCARDINE 1475 CONCESSION 5 KINCARDINE ON N2Z 2X6	PURCHASE - FEE SIMPLE	NO AGREEMENT REQUIRED
34	STATION	2	INVERHURON	I2	ALTERNATIVE	33293-0182	THE CORPORATION OF THE TOWNSHIP OF KINCARDINE;	Phone: E-mail: Fax:	177 BRUCE ROAD 23 KINCARDINE ON N2Z 2X6	MUNICIPALITY OF KINCARDINE 1475 CONCESSION 5 KINCARDINE ON N2Z 2X6	PURCHASE - FEE SIMPLE	NO AGREEMENT REQUIRED
35	STATION	2	INVERHURON	I3	ALTERNATIVE	33293	[REDACTED]	Phone: E-mail: Fax:	N/A	N/A	PURCHASE - FEE SIMPLE	NO AGREEMENT REQUIRED
36	STATION	2	KINCARDINE	K1	ALTERNATIVE	33303-0194	WEST RIDGE ON THE LAKE INC.	Phone: E-mail: Fax:	N/A	100 HUNTER VALLEY ROAD ORILLIA ON, L3V 6H2	PURCHASE - FEE SIMPLE	NO AGREEMENT REQUIRED
37	STATION	2	KINCARDINE	K2	ALTERNATIVE	33303-0866	ONTARIO PENINSULA FARMS LTD.	Phone: E-mail: Fax:	N/A	C/O NOTT FARMS (ONT.) LTD. RR4 CLINTON ON, N0M 1L0	PURCHASE - FEE SIMPLE	NO AGREEMENT REQUIRED
38	STATION	2	KINCARDINE	K3	PREFERRED	33303-0866	ONTARIO PENINSULA FARMS LTD.	Phone: E-mail: Fax:	N/A	C/O NOTT FARMS (ONT.) LTD. RR4 CLINTON ON, N0M 1L0	PURCHASE - FEE SIMPLE	NOT YET CONTACTED



Table OEB 4- 5

INFRASTRUCTURE TYPE	AGREEMENT REACHED	NEGOTIATIONS IN PROGRESS	NOT YET CONTACTED	LANDOWNER NOT INTERESTED	NO AGREEMENT REQUIRED
STATIONS	0	0	5	0	10
VALVE SITE	0	0	3	0	0
PIPE STORAGE AREA	1	0	0	1	0
TEMPORARY LAND USE AREA	6	7	2	0	3
TOTAL	7	7	10	1	13

Table OEB 4-4: Permits and Approvals

Permit Name	Jurisdiction	Administering Agency	Description	Status	Expected date	Impact if delayed
Authorization under the Fishers Act, 1985	Federal	Fisheries and Oceans Canada (DFO)	<p>Following determination of final crossing methods, a fish habitat impact screening (self-assessment) should be completed to determine if DFO review/authorization will be required.</p> <p>The proposed methods for pipeline water crossings will likely not require authorization provided measures to avoid causing serious harm to fish and fish habitat are followed during construction. These measures include designing the drill path to an appropriate depth, completing the work during the appropriate timing window, installation of appropriate sediment and erosion control measures (i.e., silt fencing around disturbed areas, development of a contingency plan, etc.). If these measures are followed, a project of this nature is considered low risk to fish and fish habitat and can proceed without DFO review.</p>	The DFO self screening is underway for all crossings along the Dornoch to BEC section.	31-May-19	Construction of the mainline can start in sections that do not require water course crossings.
Permits under Ontario Regulations 169/06 and 164/06 (Regulation of Development, Interference with Wetlands and Alterations to Shorelines and Watercourses), as per the Conservation Authorities Act, 1990	Provincial	Saugeen Valley Conservation Authority (SVCA) and Maitland Valley Conservation Authority (MVCA)	Required for works within SVCA and MVCA Regulated Areas including shorelines, watercourses, wetlands and hazardous lands (flooding and erosion hazards, and unstable soils and bedrock).	Preliminary Package submitted to SVCA. Pacakage to MVCA will be submitted in the Fall of 2019 as this is not required for the 2019 construction season	6/15/2019 (Tentative subject to SVCA review times)	No impact on schedule. Construction activities can happen outside the interest areas of the conservation authorities. Contractor will adjust execution strategy.
Register water taking activities on the Environmental Activity and Sector Registry as per the Environmental Protection Act and the Ontario Water Resources Act, 1990	Provincial	Ministry of the Environment and Climate Change (MOECC)	If dewatering activities of more than 50,000 litres (L) per day but less than 400,000 L per day are required. Any dewatering over 400,000 L/day will require a Permit to Take Water from the MOECC under the Ontario Water Resources Act.	MECP has indicated that a PTTW is required. Preparation of the PTTW technical report is underway.	6/30/2019 (Tentative subject to MECP review times).	Construction of the mainline can start in sections that do not require extensive dewatering. Will only impact the construction sequence



Permit Name	Jurisdiction	Administering Agency	Description	Status	Expected date	Impact if delayed
Species at Risk Overall Benefit Permit under the Endangered Species Act, 2007 (ESA)	Provincial	Ministry of Natural Resources and Forestry (MNRF)	<p>Consultation is required with the MNRF to determine if a permit is required under the ESA permitting process. This permitting would be required for any protected species under the ESA.</p> <p>As indicated in Section 9 (1)(a) of the ESA, "No person shall, kill, harm, harass, capture or take a living member of a species that is listed on the Species at Risk in Ontario List as an extirpated, endangered or threatened species".</p> <p>For watercourses supporting aquatic Species at Risk (SAR), the proposed trenchless crossing methods may require either the submission of a Notice of Activity form or Information Gathering Form to the MNRF to allow the Project to proceed without a permit under the ESA. This will be confirmed through consultation with the MNRF.</p>	Stantec will prepare a letter for submission to the MECP (who now are the regulators for SAR in Ontario). We will identify those locations where HDD is being substituted for open cut. In addition we will propose mitigation (most likely silt fencing) in locations of potential SAR. This is contingent upon receiving information from AECOM on HDD pit and/or open cut locations within mapped wetland areas.	Letter ready for submission May17	No anticipated impact. HDD can be used in place of open cut.
Archaeological clearance under the Ontario Heritage Act (OHA)	Provincial	Ministry of Tourism, Culture, and Sport (MTCS)	Stage 2 archaeological assessments (AA) of the right-of-way (RoW) will be completed for areas of archaeological potential prior to any ground disturbances and/or site alterations. The completed archaeological assessment reports will be forwarded to the MTCS for review and approval.	<p>Stage 1 has been submitted to MTCS and an expedite review was requested.</p> <p>Stage 2 is schedule for spring 2019</p>	<p>5/29/2019 for Stage 1 report clearance from MTCS</p> <p>Stage 2 work to commence week of May 6 (weather permitting).</p>	Construction start date will be delayed until clearance is received
A Cultural Heritage Assessment Report (CHAR). Review of built heritage and cultural heritage landscapes under the OHA	Provincial	MTCS	A Cultural Heritage Assessment Report is required to determine the effects of the Project on heritage resources and provide recommendations to mitigate the impacts, if any.	Field work completed. Report will be completed by May 31st 2019.	TBD	No anticipated impact.
Encroachment Permit under the Highways Act	Provincial	Ministry of Transportation (MTO)	Required if work will occur within the RoW of Highway 21 at Bruce Road 20 and Concession 4.	Consultation with MTO has started.	Crossing highway 21 in 2 spots.	Construction activities can start in areas where this is not required.
Crossing Approval	Provincial	Hydro One Networks Inc. (HONI)	Required for crossing HONI's electric transmission corridors.	Alignment drawings have been shared with HydroOne and consultation has started	5/31/2019	No impact for start of construction in 2019.
Bruce County Forest Conservation By-Law No, 4071 (Exemption Permit)	Municipal	Bruce County	May be required to remove trees during construction.	TBD depending on AECON clearing requirements assessment.	5/31/2019	Construction activities can start in areas where this is not required.
Tree Removal Permit	Municipal	Township of Huron- Kinloss	May be required to remove trees during construction.	Not required for 2019 construction start	4/30/2020	Not required for 2019 construction start
Road Use Agreement	Municipal	Bruce County	Required to locate pipelines within municipal road allowances.	<p>Obtained approval of alignment drawings.</p> <p>ENGLP only requires final sign-off</p>	5/31/2019	Required for construction start date
Encroachment Permit	Municipal	Grey County	Required to permit access to a County Road. Grey County requires a Franchise Agreement with EPCOR, Consent Drawings showing the proposed route and finally a completed Encroachment Permit before work can be performed.	<p>Obtained approval of alignment drawings.</p> <p>ENGLP only requires final sign-off</p>	5/31/2019	Required for construction start date



Interrogatory 5:

Reference: Exhibit A, Tab 3, Schedule 1, page 7

Preamble: *“EPCOR notes that natural gas service is expected to be available to the Bruce Energy Centre and the communities of Chelsey and Paisley for the 2019-2020 heating season contingent on Enbridge Gas completing the custody transfer station in November 2019.”*

Questions:

- (a) To the best of EPCOR’s knowledge, what is the status of Enbridge Gas’ custody transfer station work?
- (b) To the best of EPCOR’s knowledge, how will the Bruce Energy Centre and the communities of Chelsey and Paisley be impacted if the custody transfer station is not operational by November 2019?
- (c) EPCOR expects the decision by the end of May 2019 to be able to begin construction in June 2019. Please discuss the impact of receiving the OEB’s decision later than May 2019. When is the last day that EPCOR can receive the OEB’s decision before construction is pushed to the following year?

Responses:

- (a) In its letter to the OEB dated March 4, 2019 (EB-2018-0244) Enbridge Gas Inc. (“Enbridge”) indicated that “...Enbridge will make every effort to complete the custody transfer station in 2019.” In subsequent discussions with Enbridge, ENGLP understands that Enbridge is targeting November 1, 2019 as an in service date and that work has been initiated.
- (b) ENGLP is scheduled to connect customers at the Bruce Energy Center in late 2019. If the custody transfer station is not operational by November 2019 that may directly impact that schedule. ENGLP’s current construction schedule (See OEB Interrogatory 1a)) indicates that service to Chelsey and Paisley will be provided in November 2021. If the custody transfer station is not operational by November 2019 ENGLP would have to review its construction schedule to determine what impact a delay might have.



- (c) If an OEB decision is received later than mid June 2019, some construction activities may still be possible in 2019, dependant on weather conditions as is the case with all projects; however, receiving a decision later than that time will impact ENGLP's ability to connect customers in the Bruce Energy Center in 2019 and possibly have subsequent impacts on construction completed in 2020. ENGLP would have to work with its construction contractor to confirm the final impact once a decision date is known. ENGLP intends to initiate construction as soon as an OEB decision is received.



Interrogatory 6:

Reference: Exhibit A, Tab 5, Schedule 1, page 2
Exhibit A, Tab 10, Schedule 1, page 1
Exhibit A, Tab 10, Schedule 2

Preamble: *“At the time the application was filed, the locations of the pressure regulating stations that will serve the distribution systems in each of the Southern Bruce Municipalities were approximate, and EPCOR said the locations will be finalized during detailed design.”*

EPCOR states that the majority of the Preferred Route will be within existing road allowances, and that if any sections are outside road allowances, EPCOR will obtain an easement from private landowners or the appropriate authorities. EPCOR has also filed for approval of the form of the draft agreements that will be offered to affected landowners where the need for an easement arises.”

Questions:

- (a) Which, if any, of the station locations have been finalized? If there are any locations yet to be finalized, when does EPCOR expect to have them finalized?
- (b) Do any of the finalized locations require land purchases or permanent easements? If so, which ones, and when does EPCOR expect to reach agreement?
- (c) If any land purchases or easements are required for the Project, please describe the status of the negotiations and when EPCOR expects negotiations to be completed, and discuss any potential impact on the Project cost and schedule.
- (d) Please provide a summary of any comments/concerns that have been brought up by any affected landowners regarding the Project to date.
- (e) Please confirm that the forms of agreement filed by EPCOR are substantially similar to forms of agreement previously approved by the OEB and discuss any differences.

Responses:



(a) ENGLP has finalized the following station locations:

- (i) Dornoch
- (ii) Bruce Energy Centre

The stations identified above are the critical stations required for the 2019 construction season.

ENGLP is actively working to finalize the following stations. These stations will require land purchases:

- (i) Chesley Expected to be finalized by June 30th 2019
- (ii) Paisley Expected to be finalized by June 30th 2019
- (iii) Tiverton Expected to be finalized by October 1st 2019
- (iv) Inverhuron: Expected to be finalized by October 1st 2019
- (v) Kincardine: Expected to be finalized by October 1st 2019

(b) Both the finalized stations listed above require a permanent easement. Initial discussions with these landowners have taken place. ENGLP expects to reach an agreement by June 30th 2019 or prior to requiring access to the lands.

(c) ENGLP has engaged a land agent, whom is actively pursuing discussion with land owners of the other identified station locations. Contact with all landowners will be completed by May 31st, 2019.

Land purchases for the stations that have not been finalized are not critical for the Facilities planned for 2019 construction; however, ENGLP expects to have all these completed by the end of Fall 2019. ENGLP does not expect land purchases to have any effect on the project schedule or costs.

(d) To date landowners that have been approached have not had any negative comments or concerns. Please refer to Table OEB-6-1 for a summary of communication with landowners.

(e) The form of easement agreement remains the same as previously filed in this application, which ENGLP believes is substantially similar to those previously approved by the OEB.



Table OEB 6-1 : Land Owner Consultation Summary Report

TRACT	ID	INFRASTRUCTURE	STATUS	LANDOWNER	CONSULTATION SUMMARY
1	C	STATION	NOT YET CONTACTED	[REDACTED]	N/A
2	C1	STATION - ALTERNATE	NO AGREEMENT REQUIRED	[REDACTED]	Agreement will be pursued if Landowner is not interested in preferred site location.
3	C2	STATION - ALTERNATE	NO AGREEMENT REQUIRED	[REDACTED]	Agreement will be pursued if Landowner is not interested in preferred site location.
4	VS1	VALVE SITE	NOT YET CONTACTED	THE TRUSTEES OF THE VESTA CONGREGATION OF THE METHODIST CHURCH;	N/A
5	P	STATION	NOT YET CONTACTED	[REDACTED]	N/A
6	P1	STATION - ALTERNATE	NO AGREEMENT REQUIRED	[REDACTED]	Agreement will be pursued if Landowner is not interested in preferred site location.
7	P2	STATION - ALTERNATE	NO AGREEMENT REQUIRED	CALALAN FARMS LTD.;	Agreement will be pursued if Landowner is not interested in preferred site location.
8	VS2	VALVE SITE	NOT YET CONTACTED	[REDACTED];	N/A
9	PSA1	PIPE STORAGE AREA	LANDOWNER NOT INTERESTED	TURUSS (CANADA) INDUSTRY CO., LTD.;	Land Agent contacted the Plant Manager for the property to discuss the lease agreement. The Plant Manager explained that they would have to consult with the Property Manager and owner of the property (Landowner) to discuss the possibility of a pipe storage area. The Plant Manager met



TRACT	ID	INFRASTRUCTURE	STATUS	LANDOWNER	CONSULTATION SUMMARY
					with the Property Manager to discuss the potential lease. The Property Manager further discussed the site with the Landowner and it was determined that the lands would not be available for the storage site.
10	PSA2	PIPE STORAGE AREA	AGREEMENT REACHED	SNAKE CREEK FARMS LTD.;	Land Agent initiated contact via phone with Landowner. Landowner agreed to meet on site with Land Agent to discuss the lease agreement. Landowner was agreeable to the terms of the lease agreement and saw no issues with the site location. Landowner signed agreement and Land Agent will send to EPCOR for final execution.
11	TL1	TEMPORARY LAND USE AREA	NO AGREEMENT REQUIRED	PUBLIC AUTHORITY HAVING JURISDICTION;	N/A
12	TL2	TEMPORARY LAND USE AREA	NEGOTIATIONS IN PROGRESS	[REDACTED]	Land Agent contacted Landowner via phone to discuss lease agreement. Land Agent met with Landowner and left agreement documents for their review. Land Agent met again with Landowner to discuss concerns with Temporary Land Use Area (TLUA) location. Landowner requested a \$200.00 payment for lost farm rental space. Landowner also requested a terminate date for the agreement. Landowner noted that the access for the TLUA location may be blocking an entrance from the road. A rock pile may have to be moved to allow access, if necessary.
13	TL3	TEMPORARY LAND USE AREA	AGREEMENT REACHED	[REDACTED]	Land Agent contacted Landowner via phone to discuss lease agreement. Land Agent met with Landowner on site and they agreed to the terms of the agreement. Landowner signed agreement and Land Agent will send to EPCOR for final execution.
14	TL4	TEMPORARY LAND USE AREA	NO AGREEMENT REQUIRED	PUBLIC AUTHORITY HAVING JURISDICTION;	N/A
15	TL5	TEMPORARY LAND USE AREA	NEGOTIATIONS IN PROGRESS	[REDACTED]	Land Agent met with Landowner to discuss the lease agreement. Landowner expressed concern for livestock on property and requested that temporary fencing be added to



TRACT	ID	INFRASTRUCTURE	STATUS	LANDOWNER	CONSULTATION SUMMARY
					the agreement terms. Temporary fencing will be required.
16	TL6	TEMPORARY LAND USE AREA	AGREEMENT REACHED	[REDACTED];	Land Agent visited the site location and spoke with the Tenants of the property. They provided the Land Agent with the Landowners contact information. Land Agent contacted Landowner via phone and scheduled a meeting at their residence. Land Agent met with Landowner and they had no issues with the terms of the agreement. Landowner signed agreement and Land Agent will send to EPCOR for final execution.
17	TL7	TEMPORARY LAND USE AREA	AGREEMENT REACHED	[REDACTED]	Land Agent visited the Landowners residence (site) to discuss the agreements (2). Land Agent left agreement documents with Landowner for review. Landowner contacted Land Agent to inform them that they had signed both agreement and they were ready for pick up. Land Agent will send to EPCOR for final execution.
18	TL8	TEMPORARY LAND USE AREA	AGREEMENT REACHED	[REDACTED]	Land Agent visited the Landowners residence (site) to discuss the agreements (2). Land Agent left agreement documents with Landowner for review. Landowner contacted Land Agent to inform them that they had signed both agreement and they were ready for pick up. Land Agent will send to EPCOR for final execution.
19	TL9	TEMPORARY LAND USE AREA	NEGOTIATIONS IN PROGRESS	THE CORPORATION OF THE COUNTY OF BRUCE;	Land Agent met with County Transportation Engineering Technician to discuss the lease agreement. County Transportation Engineering Technician informed the Land Agent that they would provide the lease agreement to their superiors and the organization would reach a decision internally then get back to the Land Agent.
20	TL10	TEMPORARY LAND USE AREA	AGREEMENT REACHED	[REDACTED];	Land Agent met with Landowners on site to discuss lease agreement. Landowners saw no issues with the agreement. Landowner signed agreement and Land Agent will send to EPCOR for final execution.
21	TL11	TEMPORARY LAND USE AREA	NOT YET CONTACTED	[REDACTED]	Land Agent tried contacting Landowner via phone with no success. Land Agent had asked other Landowners if they had their contact information and none of the Landowner



TRACT	ID	INFRASTRUCTURE	STATUS	LANDOWNER	CONSULTATION SUMMARY
					were able to provide any.
22	TL12	TEMPORARY LAND USE AREA	NEGOTIATIONS IN PROGRESS	[REDACTED]	Land Agent met with Landowner on site to discuss lease agreement. Land Agent left agreement documents with Landowner for review. Land Agent will follow up shortly to see if Landowner is agreeable to sign.
23	TL13	TEMPORARY LAND USE AREA	AGREEMENT REACHED	SNAKE CREEK FARMS LTD.;	Land Agent initiated contact via phone with Landowner. Landowner agreed to meet on site with Land Agent to discuss the lease agreement. Landowner was agreeable to the terms of the lease agreement and saw no issues with the site location. Landowner signed agreement and Land Agent will send to EPCOR for final execution.
24	TL14	TEMPORARY LAND USE AREA	NEGOTIATIONS IN PROGRESS	[REDACTED]	Land Agent met with Landowner to discuss lease agreement. Landowner informed them that they are planning to sell the property within a matter of days. Landowner agreed to provide Land Agent the contact information of the new Landowner.
25	TL15	TEMPORARY LAND USE AREA	NEGOTIATIONS IN PROGRESS	[REDACTED] D	Land Agent contacted Landowner via phone. Land Agent set up meeting with Landowner to discuss lease agreement.
26	TL16	TEMPORARY LAND USE AREA	NO AGREEMENT REQUIRED	PUBLIC AUTHORITY HAVING JURISDICTION;	N/A
27	TL17	TEMPORARY LAND USE AREA	NOT YET CONTACTED	[REDACTED]	Land Agent has not established contact. Land Agent attempted to call Landowner with no success. Land Agent will keep investigating contact methods.
28	TL18	TEMPORARY LAND USE AREA	NEGOTIATIONS IN PROGRESS	[REDACTED]	Land Agent investigated the status of the Landowner to find that they are deceased. Land Agent found contact information for the Executor of the estate (Executor). Land Agent spoke with Executor and set up a meeting to discuss the lease agreement.
29	T1	STATION	NOT YET CONTACTED	1210987 ONTARIO INC.	N/A
30	T2	STATION - ALTERNATE	NO AGREEMENT	[REDACTED]	Agreement will be pursued if Landowner is not interested in preferred site location.



TRACT	ID	INFRASTRUCTURE	STATUS	LANDOWNER	CONSULTATION SUMMARY
			REQUIRED		
31	VS3	VALVE SITE	NOT YET CONTACTED	BEC BUSINESS & INNOVATION CENTRE INC.;	N/A
32	I	STATION	NOT YET CONTACTED	THE CORPORATION OF THE TOWNSHIP OF KINCARDINE;	N/A
33	I1	STATION - ALTERNATE	NO AGREEMENT REQUIRED	THE CORPORATION OF THE MUNICIPALITY OF KINCARDINE;	Agreement will be pursued if Landowner is not interested in preferred site location.
34	I2	STATION - ALTERNATE	NO AGREEMENT REQUIRED	THE CORPORATION OF THE TOWNSHIP OF KINCARDINE;	Agreement will be pursued if Landowner is not interested in preferred site location.
35	I3	STATION - ALTERNATE	NO AGREEMENT REQUIRED	[REDACTED];	Agreement will be pursued if Landowner is not interested in preferred site location.
36	K1	STATION - ALTERNATE	NO AGREEMENT REQUIRED	WEST RIDGE ON THE LAKE INC.	Agreement will be pursued if Landowner is not interested in preferred site location.
37	K2	STATION - ALTERNATE	NO AGREEMENT REQUIRED	ONTARIO PENINSULA FARMS LTD.	Agreement will be pursued if Landowner is not interested in preferred site location.
38	K3	STATION	NOT YET CONTACTED	ONTARIO PENINSULA FARMS LTD.	N/A



Interrogatory 7:

Reference: Exhibit A, Tab 3, Schedule 1, pages 2 and 4
Exhibit A, Tab 7, Schedule 1, pages 1-7
EB-2016-0137 / 0138 / 0139, Common Infrastructure Proposal, page 6

Preamble: *“Ontario’s Access to Natural Gas Act, 2018 will provide up to \$22 million to the Project.¹ For the purposes of calculating the three key CIP criteria, the OEB instructed EPCOR and Enbridge Gas to exclude any potential government funding, upstream reinforcement and capital contributions from customers.² EPCOR included in its CIP the three key CIP criteria reported in Table 1 below. EPCOR must demonstrate that its leave to construct application and rates application⁶ are consistent with its CIP proposal.⁷”*

Table 1: EPCOR’s Key CIP Criteria and Revenue Requirement

Metric	Value
Cumulative 10-Year Revenue Requirement per Unit of Volume	\$0.2209/m ³
Customer Years	42,569 Customer Years
Cumulative 10-Year Throughput Volume	342,186,741m ³
Cumulative 10-Year Revenue Requirement	\$75,583,261

EPCOR estimates the total capital cost of the Project to be \$87,089,000, which is one component of the cumulative revenue requirement included in its CIP.

EPCOR has identified 20 potential industrial/agricultural customers in the Southern Bruce Municipalities. Contractual discussions with industrial customers are expected to conclude prior to construction start.

At one point, EPCOR had proposed that the co-construction of a water pipeline and fibre optics network during the construction of the natural gas lines in the South Bruce Municipalities could result in synergies.

EPCOR has filed a concurrent rate application (EB-2018-0264) for its South Bruce Rate Zone.”

¹ <https://www.ontario.ca/laws/regulation/190024>

²EB-2016-0137/0138/0139 - Procedural Order No. 8, August 22, 2017, pages 9-10



Questions:

- (a) How does the \$22 million in government funding affect the cumulative 10-year revenue requirement calculated by EPCOR for its CIP?
- (b) How will the \$22 million in government funding affect the rates that EPCOR intends to charge its customers?
- (c) Please provide an update on contract discussions with the industrial customers.
- (d) Please perform a DCF analysis and report a NPV for the Project based on the proposed rates and forecast customer attachments.
- (e) Will some or all industrial customers be required to pay a capital contribution towards the Project?
- (f) How do any capital contributions from industrial customers affect the revenue requirement calculated by EPCOR for its CIP?
- (g) How do any capital contributions from industrial customers affect the rates that EPCOR intends to charge its other customers?
- (h) Does EPCOR intend to install water pipeline and fibre optics network during the construction of the natural gas lines in the South Bruce Municipalities? If so, how do any capital efficiencies affect the revenue requirement calculated by EPCOR for its CIP?
- (i) If EPCOR intends to install water pipeline and fibre optics during the construction of the natural gas lines, how do any capital efficiencies associated with water pipeline and fibre optics network affect the rates that EPCOR intends to charge its other customers?
- (j) If EPCOR intends to install water pipeline and fibre optics during the construction of the natural gas lines, how will EPCOR ensure appropriate allocation of capital costs between water pipeline, fibre optic and natural gas works?

Responses:

- (a) The \$22.0 million in funding arising from Bill 32 will reduce the cumulative 10-year revenue requirement by \$14.912 million. ENGLP notes that this value is subject to update once the actual timing of receipt of the funds is confirmed. See Table OEB-7-1 below for a calculation of that value.
- (b) See response to (a).
- (c) ENGLP is continuing negotiations with the two major industrial customers that the Southern Bruce system is expected to service. Discussions have been productive and it appears at this time that the parties will be able to resolve any outstanding issues. It has been agreed that any outstanding concerns regarding rates and terms of service will be adjudicated as part of ENGLP's rate application (EB-2018-0264).



- (d) A basic principle of the competitive process through which ENGLP was awarded CPCNs for the South Bruce municipalities³ was that within the set of common parameters under which it submitted its Common Infrastructure Proposal (“CIP”), the winning proponent would accept the risk associated with having a bid with a cumulative 10-year revenue requirement that was sufficient to cover costs to the extent that the NPV of the project was acceptable to the winning proponent. ENGLP re-confirms that it continues to be aligned with that basic principle. Given that, within the set of common parameters under which it submitted its CIP, the risk of achieving an acceptable NPV remains with ENGLP, the concept of an NPV or profitability index that meets certain criteria is not applicable to this Application.
- (e) ENGLP is not proposing that any of the industrial customers that it is in discussions with be required to pay a capital contribution towards the project. Please see ENGLP response to OEB Interrogatory 8a).
- (f) See (e) above.
- (g) See (e) above.
- (h) ENGLP currently has no plans to install water pipeline or fibre optics during the construction of the natural gas lines in the South Bruce Municipalities.
- (i) See (h) above.
- (j) See (h) above.

³ EB-2016-0137/0138/0139



Table OEB-7-1
Impact of Government Funding on Revenue Requirement

(Thousands of Dollars)

		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11
	Description	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	Cumulative
Row 1	Balance Brought Forward	0	8,544	21,591	21,001	20,411	19,821	19,231	18,641	18,051	17,461	164,752
Row 2	Additions (Including IDC)	8,663	13,659	0	0	0	0	0	0	0	0	22,322
Row 3	Depreciation	-119	-612	-590	-590	-590	-590	-590	-590	-590	-590	-5,450
Row 4	Closing Balance	8,544	21,591	21,001	20,411	19,821	19,231	18,641	18,051	17,461	16,871	181,623
Row 5												
Row 6	Mid-Year Grant Funded Asset	4,272	15,067	21,296	20,706	20,116	19,526	18,936	18,346	17,756	17,166	173,187
Row 7												
Row 8	Return on Grant Funded Asset	233	823	1,163	1,131	1,099	1,067	1,035	1,002	970	938	9,462
Row 9	Depreciation Recovery	119	612	590	590	590	590	590	590	590	590	5,450
Row 10												
Row 11	Total Revenue Requirement Impact	352	1,435	1,753	1,721	1,689	1,657	1,624	1,592	1,560	1,528	14,912



Interrogatory 8:

Reference: Exhibit A, Tab 5, Schedule 1, page 2
Exhibit A, Tab 6, Schedule 1, page 7
Exhibit A, Tab 7, Schedule 1, pages 1-7

Preamble: *“EPCOR estimates the capital cost of construction and materials to be approximately \$72,660,000 or about 83% of the \$87,089,000 total capital cost of the Project.*
EPCOR will design and install a Supervisory Control and Data Acquisition (SCADA) system to continuously monitor and the distribution system and ensure reliability.
EPCOR included a 4.7% contingency in the capital cost of the Project.
EPCOR will solicit the services of a reputable construction company, AECON Utilities, to complete the construction and installation of the mainline.”

Questions:

OEB staff understands that these questions may be more related to the setting of rates, but to allow for a comprehensive record and allow staff to confirm that the CIP is indeed reflected in the LTC application.

- (a) Please confirm whether the \$87,089,000 includes capital costs associated with the distribution systems in each of the South Bruce Municipalities (e.g., mains, service lines, meter sets).
- (b) Please confirm that the \$87 million described in the CIP is the same amount that underpins the revenue requirement in the CIP. Please show all calculations supporting that the numbers are unchanged (e.g. show how the revenue requirement for each year for the next ten years adds up to the 10 year revenue requirement in the CIP).
- (c) Did EPCOR complete a request for proposal or similar process in order to select AECON Utilities as its pipeline constructor? If not, please explain the process by which AECON Utilities was selected.
- (d) Briefly explain any strategies EPCOR will employ to reduce the capital costs of materials.
- (e) Are the capital costs of the SCADA system included in the capital costs of the Project? If not, please explain how EPCOR intends to recover the capital costs of the SCADA system?



- (f) OEB staff observes that other gas utilities in Ontario typically include a contingency in their capital costs of 10% or more.⁸ Please briefly explain how EPCOR is able to use a contingency that is lower than that of other gas utilities in Ontario.
- (g) Based on the experience of EPCOR's parent company and affiliates, please compare and contrast the total estimated capital cost per meter of the Project to at least three comparable projects completed within the last ten years for benchmarking purposes.

Responses:

- (a) ENGLP confirms that the \$87,089,000 includes capital costs associated with the distribution system (including service mains, services and meters) in each of the South Bruce Municipalities.
- (b) ENGLP confirms that the \$87 million described in the CIP is the same amount that underpins the revenue requirement in the CIP. ENGLP's CIP included a cumulative revenue requirement of \$75.583 million for the 10-year rate stability period which was built up using the \$87 million. Calculations confirming that ENGLP's revenue requirement is consistent with its CIP have been addressed in its rates application. For informational purposes, ENGLP has provided the support that its revenue requirement is consistent with its CIP below. Table OEB-8-1 includes adjustments to the \$75.583 million revenue requirement to reflect commitments made in the CIP, including the value of the \$22.0 million in external funding, the value of the municipal tax holidays and LEAP funding. The resulting cumulative revenue is \$58,534,551.

⁸ E.g., 10% in Union Gas Limited's 2015 Community Expansion, EB-2015-0179 and 10% in Enbridge Gas Distribution Inc.'s Fenelon Falls Community Expansion, EB-2017-0147.



Table OEB 8-1: Distribution Revenue Requirement Adjustment

		Col. 1	Col. 2
	Description	Calculation	Cumulative
1	CIP Revenue Requirement		75,583
2			
3	Adjustments		
4	Less: External Funding		-14,912 ⁹
5	Less: Municipal Tax Holidays		-2,208
6	Add: LEAP Funding		72
7	Adjusted Distribution Revenue Requirement	SUM (Row1:Row6)	58,534,551

Table OEB-8-2 shows the revenue requirement for each year of the 10-year rate stability period which in total equals the adjusted revenue requirement of \$58.535 million.

Table OEB 8-2: Revenue Requirement by Year

(Thousands of Dollars)

EPCOR Southern Bruce System	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11
Description	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	Cumulative
1 Distribution Revenues	589	3,050	4,621	5,818	6,646	7,190	7,455	7,594	7,727	7,846	58,535

⁹ The depreciation and return on the assets funded by the external fund is deducted from EPCOR's CIP revenue requirement over the rate stability period.



- (c) ENGLP has successfully partnered with AECON in a number of competitive P3 RFPs in Canada. In winning these projects the companies have proven they are competitive as a team. In building its team to bid on the South Bruce project EPCOR approached AECON to determine alignment regarding the type of project, risk sharing and level of experience necessary to be successful the parties agreed to partner for the project. The cost competitiveness of the team was confirmed when the Board selected EPCOR as the proponent with the most favourable proposal.
- (d) ENGLP notes that, within the framework of the common parameters under which it developed its CIP, it has accepted the risk of capital cost overruns and the capital costs as included in its CIP are those that support its revenue requirement.
- (e) The capital cost of the SCADA system are included in the capital costs of the project.
- (f) ENGLP is unaware of the process that Union Gas Limited and Enbridge Gas Distribution Inc. used in determining the respective contingency for the projects highlighted in the IR. ENGLP does point out that its understanding is that those projects were not subject to a competitive process. As it relates to determining the contingency for the South Bruce project, ENGLP worked closely with its contractors in determining the optimal design and construction methods as well as which party can most effectively mitigate the various risks associated with a large construction project. Once the parties agree on the most cost effective manner in which to allocate risk, that party accepts the risk and works diligently to manage those risks. This approach has allowed ENGLP, and its affiliates, to be cost and quality competitive in competitive processes.
- (g) This is the first large construction project related to a green-field natural gas distribution system that ENGLP's parent company or affiliates have undertaken. As a result, it does not have comparable projects for which it can compare and contrast the total estimated capital cost per meter of the project.



Interrogatory 9:

Reference: Exhibit A, Tab 7, Schedule 1, Table 2, page 6
 Exhibit A, Tab 3, Schedule 4

Preamble: *“EPCOR provides the customer forecast from its CIP in Table 2 (below). EPCOR also provided the survey results from its July 2017 survey on the likelihood of residential customers in the area converting to natural gas. The survey concluded that 58% of the residents “Definitely Would Convert” or “Would Likely Convert”. EPCOR used a 60% target as the overall 10-year capture rate for residential customers.”*

Table 2 - CIP Customer Forecast

Customer Type	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	Cumulative
Existing Residential	861	2,297	3,237	3,742	4,176	4,349	4,349	4,349	4,349	4,349	36,058
New Residential	46	103	159	215	271	328	384	424	462	469	2,861
<i>Sub Total</i>	907	2,400	3,396	3,957	4,447	4,677	4,733	4,773	4,811	4,818	38,919
Small Commercial	55	144	215	288	343	359	359	359	359	359	2,840
Medium Commercial	10	27	43	59	67	69	69	69	69	69	551
Large Commercial	3	7	13	16	17	19	19	19	19	19	151
<i>Sub Total</i>	68	178	271	363	427	447	447	447	447	447	3,542
Small Agricultural	0	0	0	1	2	2	2	2	2	2	13
Industrial and Large Agricultural	4	5	9	11	11	11	11	11	11	11	95
<i>Sub Total</i>	4	5	9	12	13	13	13	13	13	13	108
Grand Total	979	2,583	3,676	4,332	4,887	5,137	5,193	5,233	5,271	5,278	42,569

Questions:

- (a) Please confirm that the customer addition forecast that underpins the economics of the Project has not changed since that proposed in the CIP and reported in Table 3 above. If it is not, please identify and explain the reasons for any differences.
- (b) Please explain why EPCOR used a 60% capture rate instead of 58%.
- (c) What will EPCOR do if its customer connection forecast fails to materialize?
- (d) How would EPCOR’s ratepayers be affected after the rate stability period if the actual customer connections are materially less than forecast?
- (e) Please confirm that the cost ratios provided to survey participants reflected the total delivered cost of the various fuel types compared to the total delivered cost of



EPCOR providing natural gas.

Responses:

- (a) The customer addition forecast has changed from that proposed in the CIP. The customer addition forecast in the CIP was based on a “common construction schedule for gas mains, based on certain assumed timelines for OEB decisions”¹. These assumed timelines for OEB decisions were developed in order to create a common starting point for which the proponents could develop their CIPs. As included in Table OEB-9-1, there are material changes between the assumed timelines for OEB decisions included as a common assumption in the CIP versus the actual / forecast dates. This includes an almost ten month delay expected in timing of receipt of a decision on this leave to construct application. While ENGLP has been able to mitigate some of that ten month delay, it has driven a three month delay in the start of construction. The three month delay in beginning construction translates into losing a material portion of the 2019 construction season. This has pushed the ability of ENGLP to connect certain customers by up to a year, reshaping the customer connection profile as system availability is delayed.

Table OEB 9-1: Common Construction Schedule in CIP vs Actual / Forecast

Activity	Col 1 Common Parameter	Col 2 Actual / Forecast Date	Col 3 Difference (months)
1 Decision on the elements of an appropriate bidding framework on which the competitors seek further direction from the OEB	August 2017	July 20, 2017 – OEB Staff Progress Update: South Bruce Expansion Applications OEB file No: EB-2016-0137/0138/ 0139	(1)
2 Proposals for competition due	October 2017	October 16, 2017	0
3 Decision for successful proponent	December 2017	April 12, 2018 - Decision and Order EB-2016-0137/0138/ 0139	3

¹ OEB Staff Progress Update: South Bruce Expansion Applications OEB File No. EB-2016-0137/038/0139, July 20, 2017, Construction Schedule, Pages 5 – 6.



4	Filing of pre-filed evidence for LTC, rates, Franchise and Certificate application	March 2018	September 20, 2018 - LTC ² ; October 2, 2018 - Rates Application	5
5	LTC approval	August 2018	June 2019 ³ - Forecast	10
6	Construction begins in South Bruce	March 2019	July 2019 - Forecast	3

The updated customer attachment forecast is included in Table OEB-9-2 and is driven by the revised construction schedule. ENGLP notes that the new customer attachment forecast is more aggressive than the forecast included in its CIP, with total customers attached catching up to its CIP values by 2021.

Table OEB-9-2: Customer Connections CIP vs Updated Construction Schedule

		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10
	Description	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Row 1	Customer Connections CIP	979	2,583	3,676	4,332	4,887	5,137	5,193	5,233	5,271	5,278
Row 1	New Construction Schedule	2	1,292	3,676	4,332	4,887	5,137	5,193	5,233	5,271	5,278

- (b) ENGLP used a 60% capture rate instead of 58% as it expected some level of conversion by customers who gave responses other than they would “definitely” or “likely” convert.
- (c) ENGLP will continue to review the success of its conversion strategy over the life of the project. If the connection forecast fails to develop as anticipated, ENGLP will work to determine the cause and implement measures to increase customer connections.
- (d) After the 10-year rate stability period, ENGLP will file a rate application that will implement the OEB’s then current cost of service framework. There are a number of factors that may affect ratepayers as a result of that transition. Those factors include

² As per EB-2016-0137/0138/ 0139 Decision And Order April 12, 2018, page 14, Section 5 Order, paragraph 4, EPCOR had until October 12, 2018 to file a leave to construct

³ On November 29, 2018 the OEB filed a letter with EPCOR indicating that the LTC and Rate Application for Southern Bruce was placed in abeyance. On March 21, 2019 the OEB issued a letter indicating that it will commence processing the LTC. See Exhibit 6, Tab 1, Schedule 2 for copies of the letters.



actual number of customer attachments, the mix of customer types, the actual gas volumes delivered by customer type, and actual operations and maintenance costs. Each of those factors will have a differing affect on ratepayers and some would tend to offset others e.g. lower customer connections may reduce operations and maintenance costs. If actual customer connections are materially less than forecast, then the rates in a cost of service environment would tend to trend upward.

(e) Confirmed



Interrogatory 10:

Reference: Exhibit A, Tab 7, Schedule 1, Table 3, page 7
 EB-2016-0137|-0138|-0139 EPCOR CIP Application, Schedule D, page 3
 “Table D – Volumes”

Preamble: “EPCOR provides a volumetric forecast in Table 3.

Table 3 - CIP Throughput Volumes (m³)

Customer Type	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	Cumulative
Existing Residential	925,145	3,393,271	5,946,283	7,498,936	8,507,891	9,160,113	9,346,001	9,346,001	9,346,001	9,346,001	72,815,642
New Residential	47,518	153,917	270,646	386,342	502,038	618,767	735,496	834,664	915,238	961,723	5,426,349
<i>Sub Total</i>	972,663	3,547,188	6,216,929	7,885,278	9,009,929	9,778,880	10,081,497	10,180,665	10,261,239	10,307,724	78,241,991
Small Commercial	129,058	466,954	842,394	1,180,290	1,480,642	1,647,243	1,684,787	1,684,787	1,684,787	1,684,787	12,485,727
Medium Commercial	134,665	498,261	942,655	1,373,583	1,696,779	1,831,444	1,858,377	1,858,377	1,858,377	1,858,377	13,910,895
Large Commercial	113,528	378,425	756,850	1,097,433	1,248,803	1,362,330	1,438,015	1,438,015	1,438,015	1,438,015	10,709,428
<i>Sub Total</i>	377,250	1,343,639	2,541,899	3,651,305	4,426,223	4,841,017	4,981,179	4,981,179	4,981,179	4,981,179	37,106,049
Small Agricultural	0	0	0	2,360	7,080	9,440	9,440	9,440	9,440	9,440	56,640
Industrial and Large Agricultural	4,063,779	23,760,251	24,187,482	24,798,991	24,985,073	24,985,073	25,028,741	25,002,523	24,985,073	24,985,073	226,782,062
<i>Sub Total</i>	4,063,779	23,760,251	24,187,482	24,801,351	24,992,153	24,994,513	25,038,181	25,011,963	24,994,513	24,994,513	226,838,702
Grand Total	5,413,691	28,651,078	32,946,310	36,337,933	38,428,305	39,614,410	40,100,857	40,173,807	40,236,931	40,283,416	342,186,741

EPCOR provided the following volumetric forecast in its CIP Application: ”

Table D3 - Volumes

Customer Type	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	Total Available Market
Existing Residential (m ³)	925,145	3,393,271	5,946,283	7,498,936	8,507,891	9,160,113	9,346,001	9,346,001	9,346,001	9,346,001	15,580,250
New Residential (m ³)	47,518	153,917	270,646	386,342	502,038	618,767	735,496	834,664	915,238	961,723	1,613,546
<i>Sub Total</i>	972,663	3,547,188	6,216,929	7,885,278	9,009,929	9,778,880	10,081,497	10,180,665	10,261,239	10,307,724	17,193,796
Small Commercial (m ³)	129,058	466,954	842,394	1,180,290	1,480,642	1,647,243	1,684,787	1,684,787	1,684,787	1,684,787	2,599,077
Medium Commercial (m ³)	134,665	498,261	942,655	1,373,583	1,696,779	1,831,444	1,858,377	1,858,377	1,858,377	1,858,377	2,869,550
Large Commercial (m ³)	113,528	378,425	756,850	1,097,433	1,248,803	1,362,330	1,438,015	1,438,015	1,438,015	1,438,015	2,091,631
<i>Sub Total</i>	377,250	1,343,639	2,541,899	3,651,305	4,426,223	4,841,017	4,981,179	4,981,179	4,981,179	4,981,179	7,560,257
Small Agricultural (m ³)	-	-	-	2,360	7,080	9,440	9,440	9,440	9,440	9,440	33,040
Industrial and Large Agricultural (m ³)	5,626,889	33,095,244	33,548,693	34,177,652	34,363,734	34,363,734	34,363,734	34,363,734	34,363,734	34,363,734	34,942,066
<i>Sub Total</i>	5,626,889	33,095,244	33,548,693	34,180,012	34,370,814	34,373,174	34,373,174	34,373,174	34,373,174	34,373,174	34,975,106
Grand Total	6,976,802	37,986,071	42,307,521	45,716,594	47,806,966	48,993,071	49,435,850	49,535,018	49,615,592	49,662,077	59,729,159

Questions:

- (a) Please explain why the volumetric forecast for Industrial and Large Agricultural customers in the LTC application is different from that of the CIP. Please discuss the impact this difference has on the three key CIP criteria.



Responses:

(a) In its October 2017 CIP submission, ENGLP provided its volumetric forecast in Table D3 – Volume, presenting capacity volume for large agricultural and industrial customers. In Procedural Order 9, Interrogatory #2(b) (EB-2016-0137|-0138|-0139), the board asked ENGLP to provide updated CIP values and metrics using an annual normalized average consumption (NAC) approach for large agricultural and industrial customers. On January 11, 2018, ENGLP provided¹ updated volumes for large agricultural and industrial customers using an annual NAC approach which resulted in a Cumulative 10 year Volume of 342,186,741 m³. From this point on, the NAC volumes were used and are shown in Table 3, provided in the LTC application.

ENGLP confirms that there is no impact of this difference on the three key CIP criteria submitted in its LTC in Table 1 – Key Metrics and Revenue Requirement.

¹ EB-2016-0137|-0138|-0139, EPCOR Responses to Interrogatories Table 2(b), dated January 11, 2018.



Interrogatory 11:

Reference: Exhibit A, Tab 7, Schedule 1, page 3

Preamble: *“The OEB’s Partial Decision on the Issues List in the CIP Proceeding stated that during the rate stability period the proponent’s revenue related to its controllable costs will be capped at its proposed level; the rate stability period may include an allowance for consideration of externally driven, unforeseen events as well as annual financial allowance updates typically allowed by the OEB⁹”*

Questions:

- (a) To date, has EPCOR identified any externally driven, unforeseen events associated with its leave to construct application for which it may seek to pass through costs to its consumers within the rate stability period? If so, please list and briefly describe the events and for each include an estimate of costs, if possible.
- (b) If events were identified in part (a), please describe the potential monthly residential bill impact that could arise from the total cost of all events.

Responses:

- (a) ENGLP has identified externally driven, unforeseen events associated with its leave to construct application (more specifically timelines for OEB decision which have subsequently directly impacted its construction schedule) for which it will seek to pass through costs to its consumers within the rate stability period. ENGLP is of the view that issues related to recovery of distribution costs are more appropriately addressed in its rates application (EB-2018-0264). However, in order to fully respond to this IR, ENGLP has provided information included in that application for informational purposes.

As background, one of the common assumptions used by the proponents when developing their CIPs was a common construction schedule¹⁰. This common schedule included a LTC approval date of August 2018. As of the date on which ENGLP responded to this IR it is expected that a decision related to LTC will be made by mid

⁹EB-2016-0137/0138/0139: Partial Decision on the Issues List and PO No.6, June 27, 2017; pg. 4

¹⁰ OEB Staff Progress Update: South Bruce Expansion Applications OEB File No: EB-2016-0137/0138/ 0139, July 20, 2017, Construction Schedule, Pages 5 - 6



June 2019. This approximate 10 month delay has directly impacted ENGLP's construction schedule and therefore its ability to achieve the customer connection forecast included in its CIP. (Please see response to OEB Interrogatory 1a) for details regarding the impact on the construction schedule and OEB Interrogatory 9a) for details regarding direct impact on customer connection forecast.)

The additional externally driven, unforeseen events that impacted the timelines for OEB decisions include the following.

- After filing its leave to construct, ENGLP received notification from Ontario Infrastructure on September 26, 2018 that the province would no longer be providing the \$22.0 million previously awarded through its Natural Gas Grant Program ("NGGP").
- On November 29, 2018 the OEB informed ENGLP that it had placed the leave to construct and rates applications into abeyance as a result of the loss of NGGP funding.
- On March 7, 2019 the Government of Ontario filed Ontario Regulation 24/19 *Expansion of Natural Gas Distribution Systems* which stated in Schedule 1 that the Southern Bruce Project was eligible for rate protection up to \$22.0 million.
- On March 21, 2019 the OEB informed ENGLP that it would commence processing the leave to construct application.

The delay in connecting customers driven by the change in construction schedule has impacted ENGLP's ability to generate revenue and resulted in a revenue shortfall. For informational purposes, as included in Table OEB-11-1 the NPV of the revenue deficiency is \$1.640 million.

Table OEB 11-1: Summary of Revenue Deficiency (\$000)

Description	Col. 1 NPV of Revenue Deficiency
1 Change in Customer Connection Profile - Forgone Revenue	2,324
2 Delay in Property Taxes - Forgone Cost	(224)
3 <u>Change in Capital Expenditure Profile - Forgone Cost</u>	<u>(460)</u>
4 Sum	1,640



- (b) The potential monthly residential bill impact that could arise from the total costs of the events detailed in a) are outside the scope of the Application and have been addressed in Exhibit 6 of ENGLP's rates application (EB-2018-0264).





Interrogatory 12:

Reference: Exhibit A, Tab 7, Schedule 1, page 5

Preamble: *“EPCOR intends to share certain staff between its Aylmer and South Bruce operations facilities, the costs will be determined on a fully allocated basis, consistent with the OEB’s requirements in Procedural Order 8 of the CIP process.”*

Questions:

- (a) Please provide a list of the job titles of Aylmer staff who may provide services to the South Bruce operations. For each job title, please include a brief description of the services that may be provided.

Responses:

- (a) There are two Alymer staff that will provide services to the South Bruce operations, the General Manager and the Administration & Field Supervisor. The General Manager will provide general oversight and direction related to the ongoing operations of the South Bruce utility, with the South Bruce Field Supervisor reporting directly to this individual. This individual will not be involved in providing oversight or direction related to the construction of the gas distribution system.

The Administration & Field Supervisor will provide oversight and direction to the two South Bruce administrative staff. This will include activities related to ongoing operations such as customer inquiries and the billing function. This individual will not be involved in providing oversight or direction related to the construction of the gas system.



Interrogatory 13:

Reference: Exhibit A, Tab 8, Schedule 1, page 1

Preamble: *“EPCOR will enter into an Interconnect Operating agreement with Enbridge Gas; such interconnection point will be known as Dornoch. Enbridge Gas will be the sole upstream supplier to EPCOR. EPCOR and Enbridge Gas will enter into a firm upstream Transportation Agreement approved by the OEB. The agreements between EPCOR and Enbridge Gas will ensure the 10-year capacity needs of EPCOR’s Southern Bruce system and is consistent with the 10-year capacity projection in the CIP.”*

Questions:

- (a) Will EPCOR be required to pay Enbridge Gas a capital contribution toward any facilities Enbridge Gas will need to construct in order to supply gas to EPCOR? If so, what is the amount of the capital contribution?
- (b) Does EPCOR foresee any expansion opportunities beyond year 10 at this point? If so, does EPCOR foresee any issues obtaining additional gas supply from Enbridge Gas (or other sources) to facilitate that expansion?

Responses:

- (a) Enbridge has indicated that their current estimate is that they will require capital contributions of \$2.363 million relating to the Owen Sound Reinforcement and \$2.935 million relating to the customer station at Dornoch. This level of capital contribution is subject to an update by Enbridge. ENGLP does not agree with the requirement to pay a capital contribution related to Enbridge’s Owen Sound Reinforcement and has intervened in Enbridge’s Rate M17 Firm Transportation Service Application (EB-2018-0244) in order to obtain a decision regarding this matter. Enbridge has sought to withdraw that application, with the stated intent of addressing the M17 service in a leave to construct application to be filed in relation to Owen Sound Reinforcement.
- (b) At this time ENGLP does not foresee any expansion opportunities beyond year 10, other than those related to normal customer growth. ENGLP does not foresee any issues in obtaining additional gas supplies to facilitate normal customer growth.



Interrogatory 14:

Reference: Exhibit A, Tab 11

Preamble: *“The Ministry of Energy, Northern Development and Mines (MENDM)¹⁰ has delegated to EPCOR the procedural aspects of the Crown’s duty to consult for this project.”*

Questions:

- (a) Please provide an update on communications with MENDM regarding the sufficiency of EPCOR’s activities with respect to the duty to consult. When does EPCOR expect to receive and file on the OEB’s record a letter from the MENDM regarding the sufficiency of its Indigenous consultation?

Responses:

- (a) ENGLP has been in ongoing discussion with MENDM regarding indigenous consultation for the project since submitting its leave to construct application. ENGLP provided an indigenous consultation report to MENDM which was a compilation of all indigenous consultation activities found in the environmental report and leave to construct. On May 1, 2019, ENGLP received the attached letter regarding the sufficiency of ENGLP’s activities with respect to the duty to consult from the MENDM (see Attachment OEB-14-1).

¹⁰ Formerly the Ministry of Energy (MOE)

Ministry of Energy, Northern
Development and Mines

Ministère de l'Énergie, du
Développement du Nord et des
Mines

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Tél: (416) 325-6544



Indigenous Energy Policy

VIA EMAIL

May 1, 2019

Zora Crnojacki
Ontario Pipeline Coordinating Committee Chair
PO Box 2319, 2300 Yonge Street
Toronto, Ontario | M4P 1E4

Re: Consultation Sufficiency Opinion for Southern Bruce Natural Gas Project

Dear Ms. Crnojacki,

The Ontario Ministry of the Energy, Northern Development and Mines has completed its review of EPCOR's Indigenous consultation report for the Southern Bruce Natural Gas Project. This letter is to notify you that based on the information provided and through contacting the communities directly, the ministry is of the opinion that the procedural aspects of consultation undertaken by EPCOR to date for the purposes of the Ontario Energy Board's Leave to Construct for the Southern Bruce Natural Gas project is satisfactory.

The ministry understands from discussion with EPCOR and the communities identified for consultation that EPCOR will continue to work with the communities, sharing project information and identifying project benefits, as appropriate.

If you have any questions about this letter or require any additional information, please contact Raina Crasto at 416-326-4571 or raina.crasto@ontario.ca

It is expected that EPCOR will continue its consultation activities with the communities throughout the life of the project, and that EPCOR will notify the Ministry should any additional rights-based concerns/issues arise.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon McCabe".

Shannon McCabe, Manager
Indigenous Energy Policy

c: Kevin Sonnenberg
Andrew Laycock
Ontario Pipeline Coordinating Committee



Interrogatory 15:

Reference: Environmental Report, Appendix E - Archeological Assessment, Figure 5
"Results Overview – Stage 1 Property Inspection Results"

Preamble: *"Figure 5 contains "draft" in the title block."*

Questions:

- (a) Please confirm whether this is in fact the final version of Figure 5. If not, please file the final version of Figure 5 with a written description of the differences between the draft and final versions.

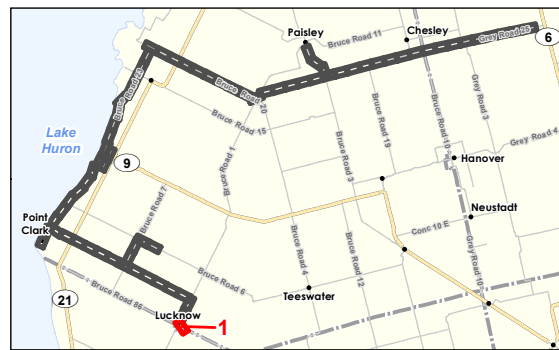
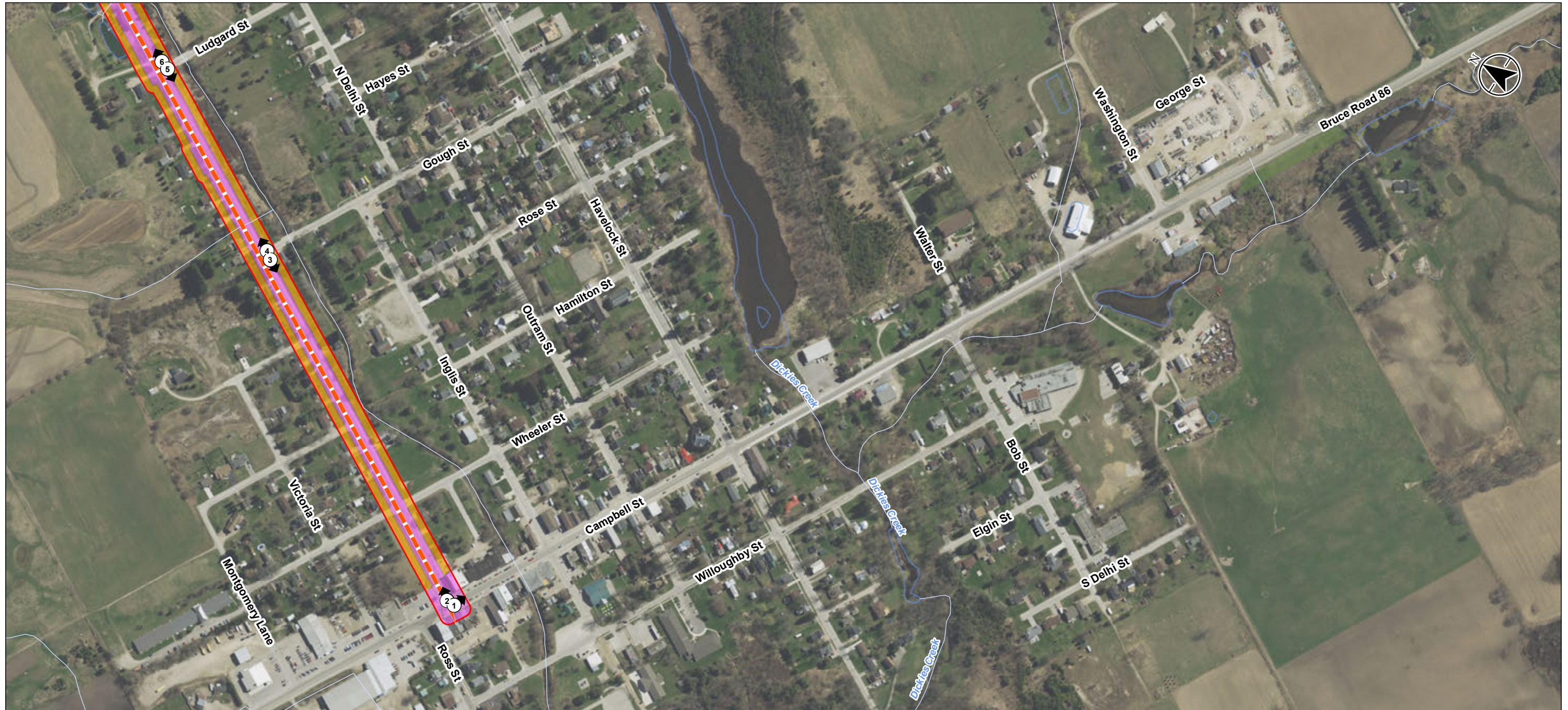
Responses:

- (a) The final version of Figure 5 has been submitted to the Ministry of Tourism, Culture and Sport (MTCS) as part of the updated Stage 1 Archaeological Assessment Report Dated: January 14th, 2019. This report was updated after a field consultation was completed with the Saugeen Ojibway Nation (SON). Figure 5 is also attached to this response (see Attachment OEB-15-1).

The following is a description of the changes made

- Additional areas of previous assessments, extracted from the Ontario Public Register of Archaeological Reports, were added to Figures 5-2, 5-39, 5-41, 5-53, 5-54, and 5-63.
- Areas recommended for deeply buried potential were removed on Figure 5-23, and reduced in size on Figure 5-30.
- Areas recommended for Cemetery Investigation were reduced to only include areas outside the road right of way on Figures 5-10, 5-29, 5-46 and 5-50.

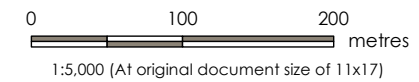
All these changes were implemented based on the recommendations and advice from the SON's archaeologist.



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - No Potential - (Low and Wet)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

1. Coordinate System: NAD 1983 UTM Zone 17N
2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © Queen's Printer for Ontario, 2018.
3. Orthoimagery © MNRF, 2015. Imagery Date, 2015.



Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13
 160950831 REVA

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

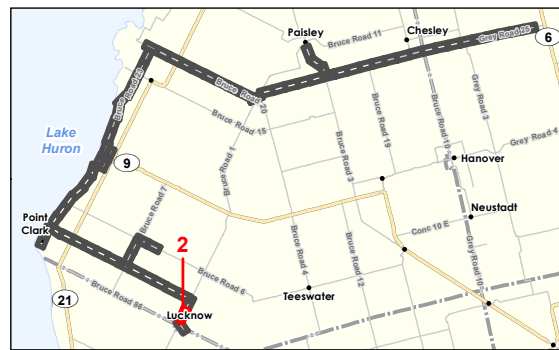
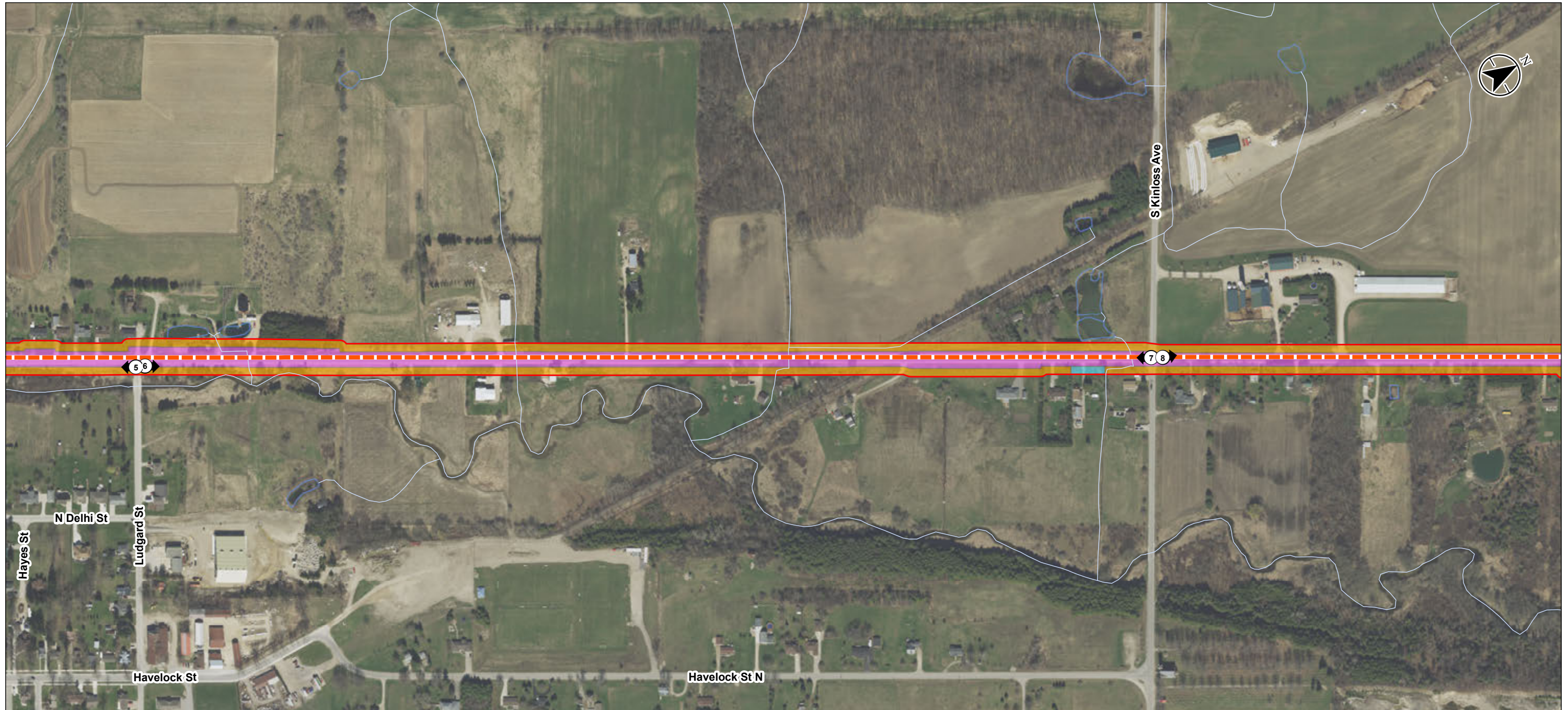
Figure No.

5-1

Title

Results Index – Stage 1 Property Inspection Results

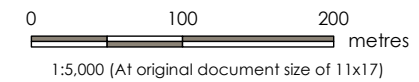
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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Previously Assessed, SJAI 2016
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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Project Location: Counties Of Bruce, Grey and Huron
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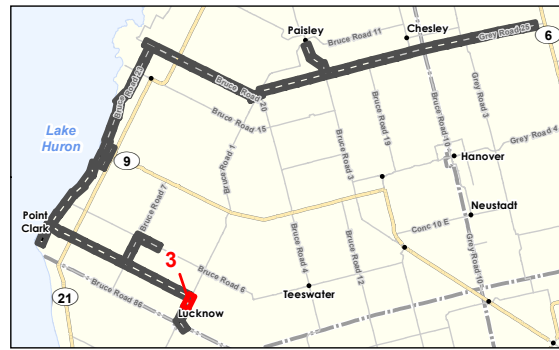
Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.

5-2

Title

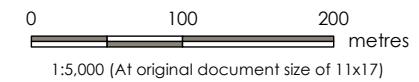
Results Index – Stage 1 Property Inspection Results



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - Cemetery (Requires Avoidance)
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

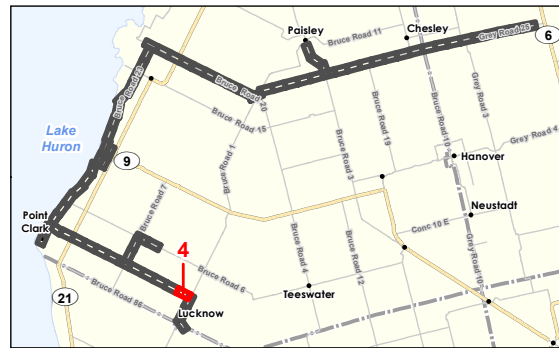
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5-3

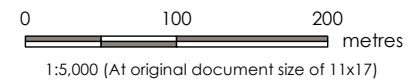
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Results Index – Stage 1 Property Inspection Results

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- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse



Project Location: Counties Of Bruce, Grey and Huron
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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.

5-4

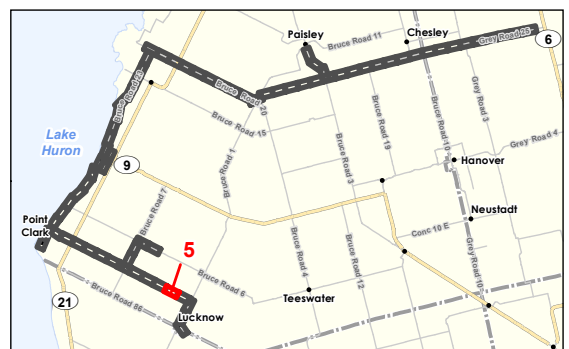
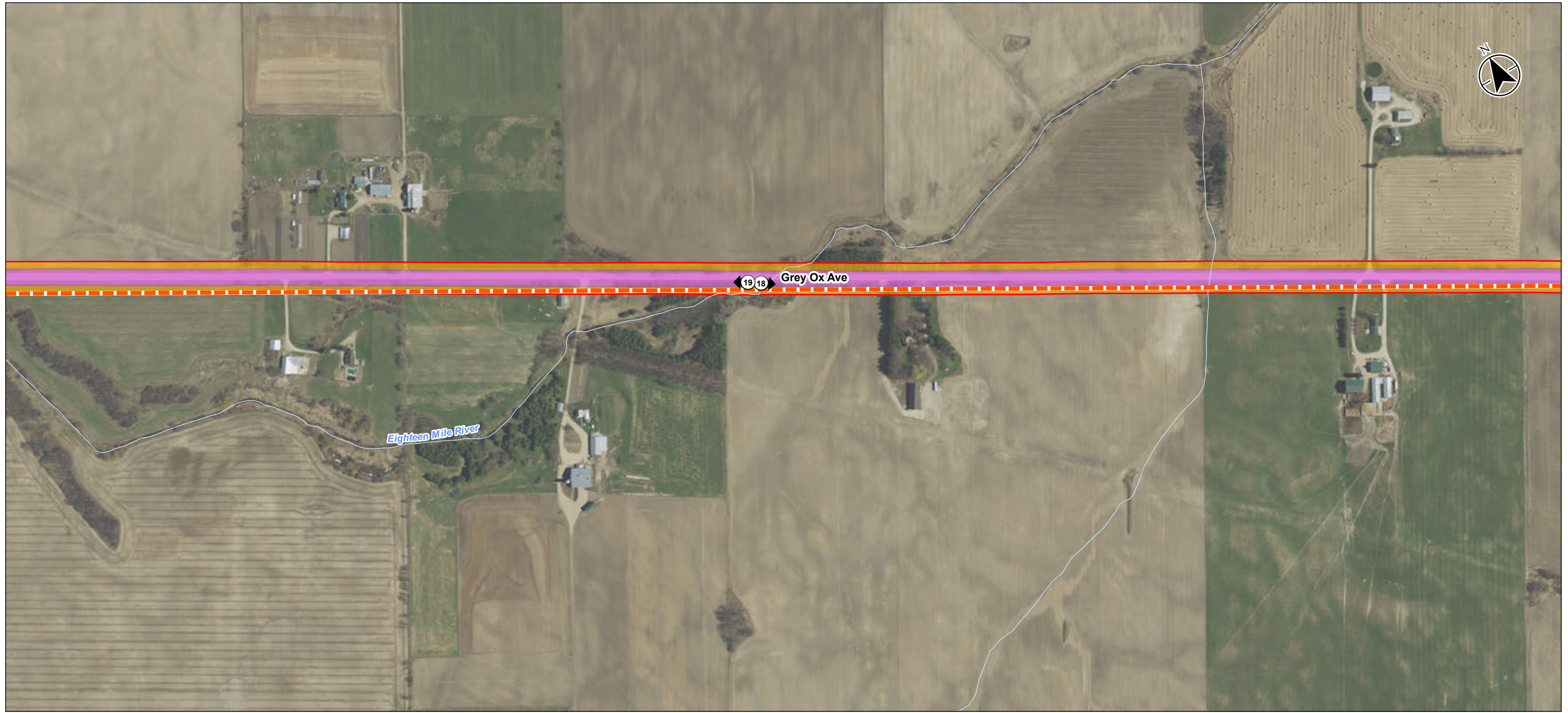
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Results Index – Stage 1 Property Inspection Results

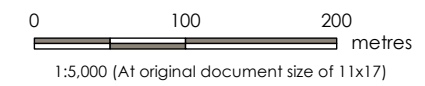
- Notes**
1. Coordinate System: NAD 1983 UTM Zone 17N
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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse



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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-5**

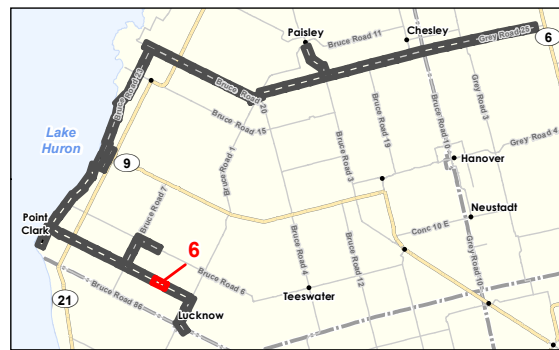
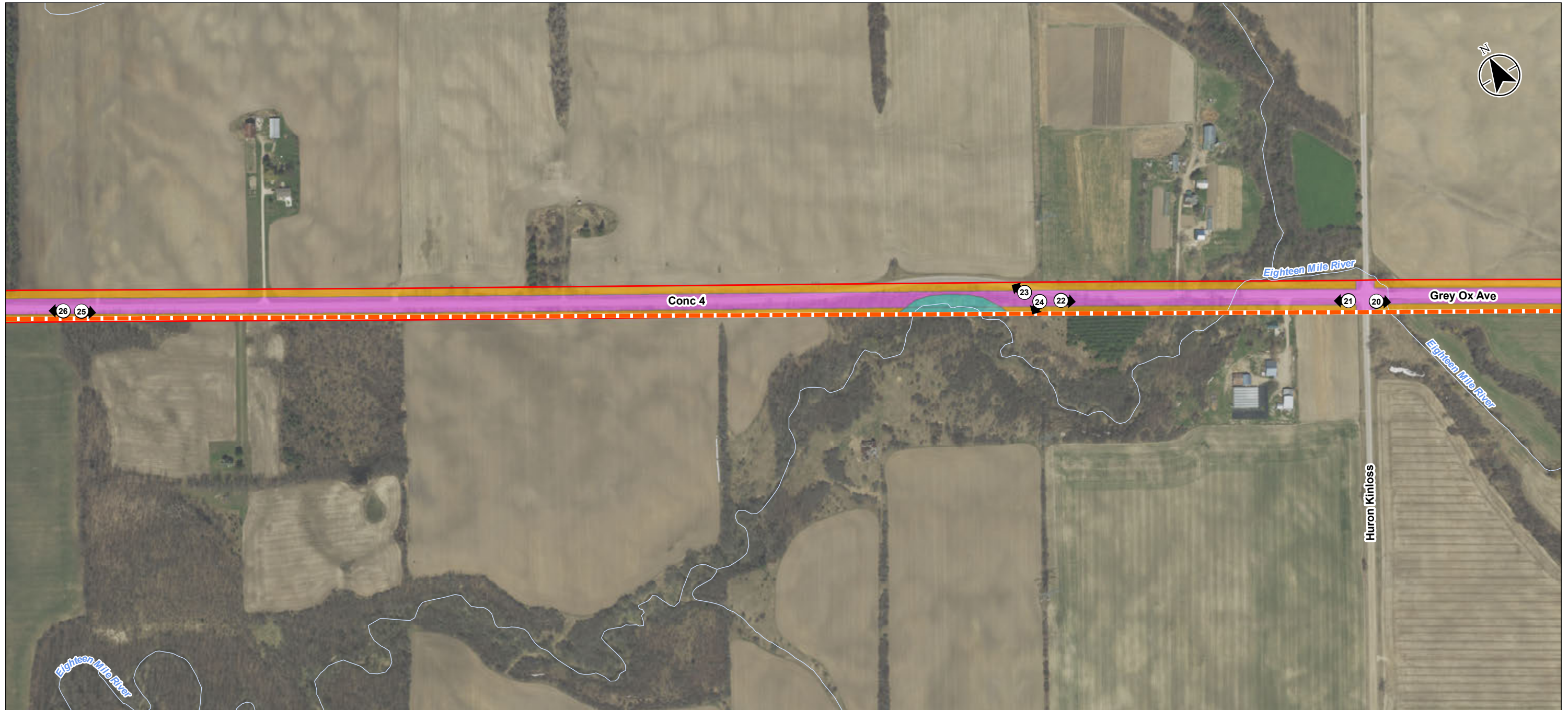
Title: **Results Index – Stage 1 Property Inspection Results**

Notes

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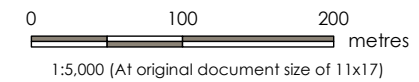
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- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Steeply Sloped)
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse

Notes

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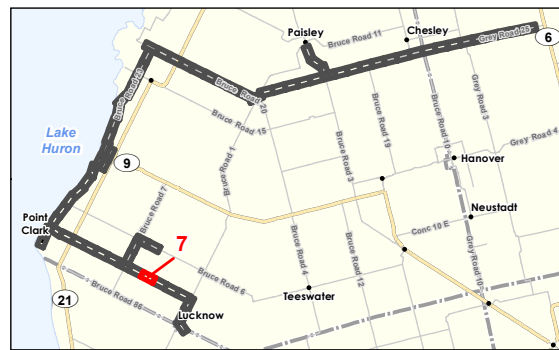
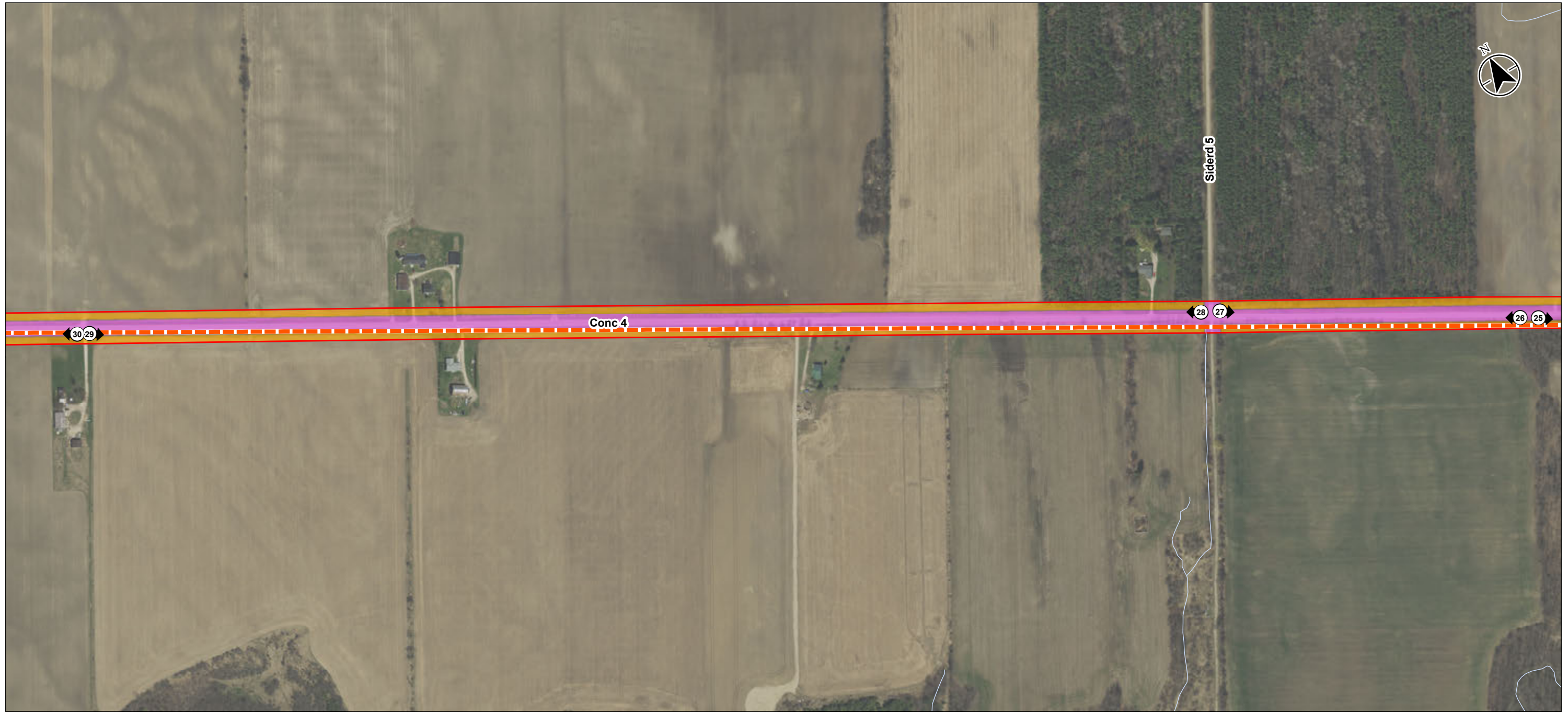
Client/Project: EPCOR UTILITIES INC.
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 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.

5-6

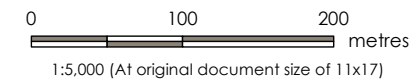
Title

Results Index – Stage 1 Property Inspection Results



- Legend**
- — — Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse

- Notes**
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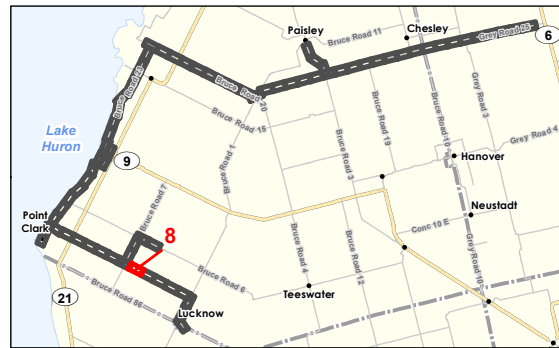
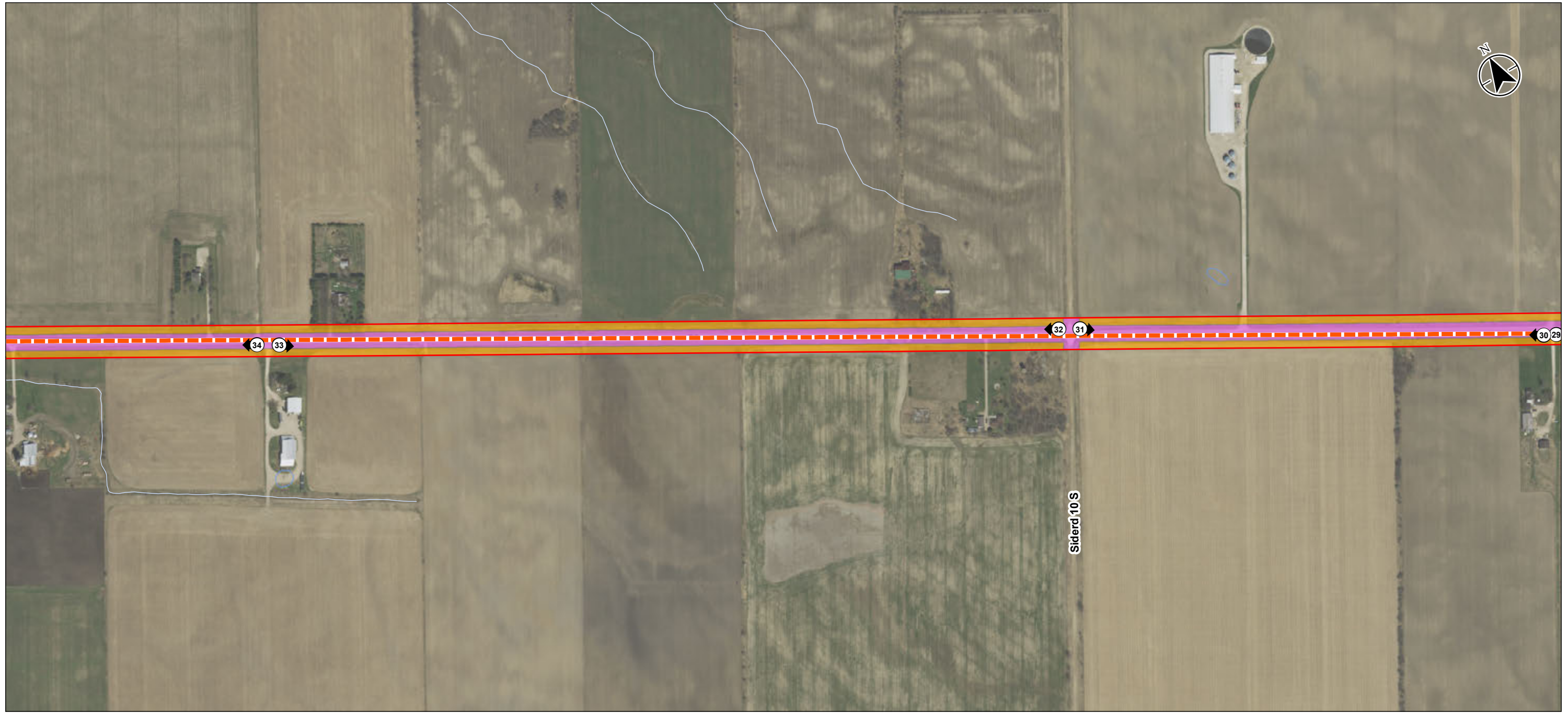
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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-7**

Title: **Results Index – Stage 1 Property Inspection Results**

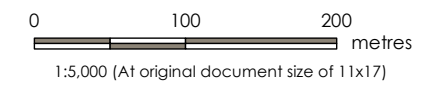
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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse
 - Waterbody

Notes

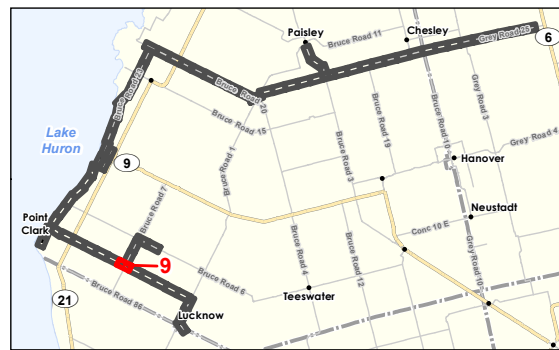
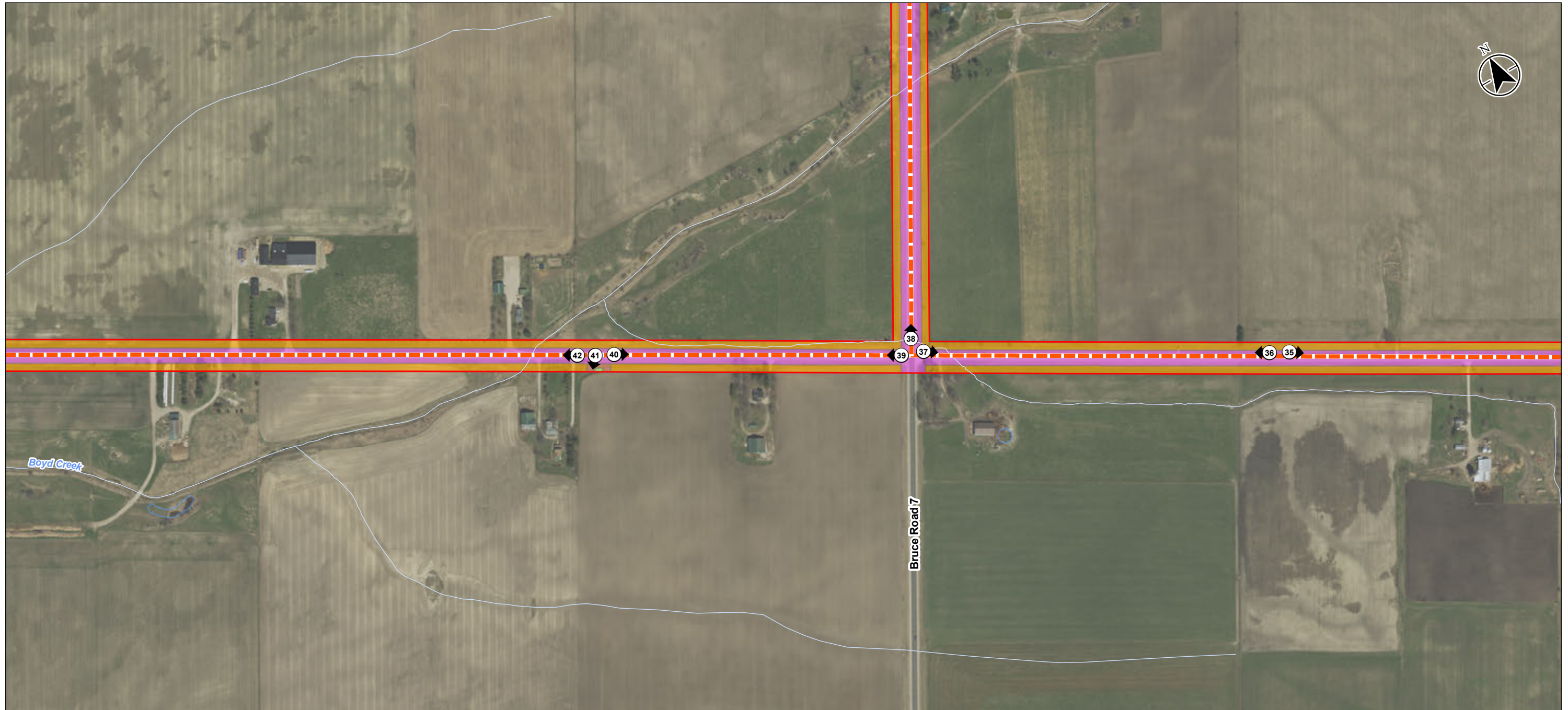
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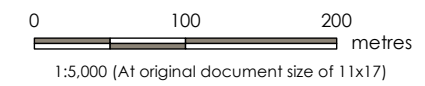
Figure No.: **5-8**
 Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- Preliminary Preferred Route
 - Study Area
 - Cemetery (Requires Avoidance)
 - Requires Stage 3 Cemetery Investigation
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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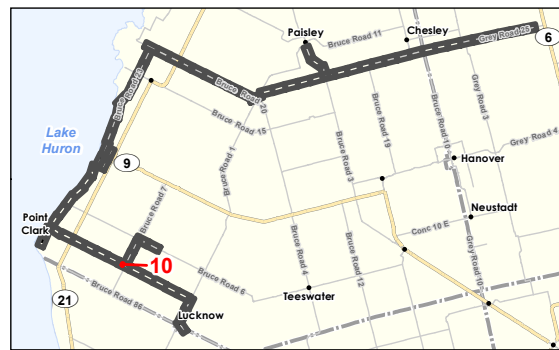


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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-9**

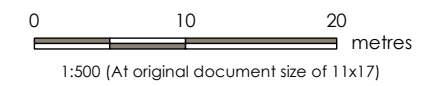
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - Cemetery (Requires Avoidance)
 - Requires Stage 3 Cemetery Investigation
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse

Notes

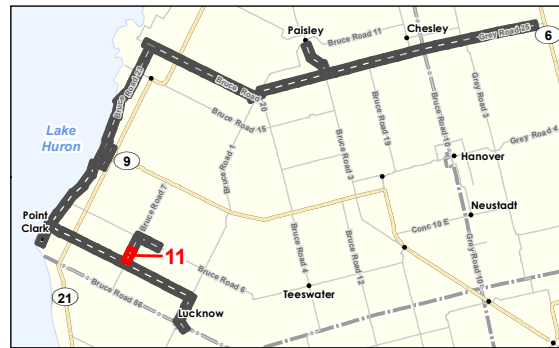
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 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

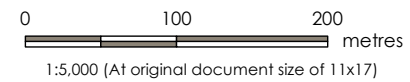
Figure No. **5-10**
 Title **Results Index – Stage 1 Property Inspection Results**



- Legend**
- — — Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse

Notes

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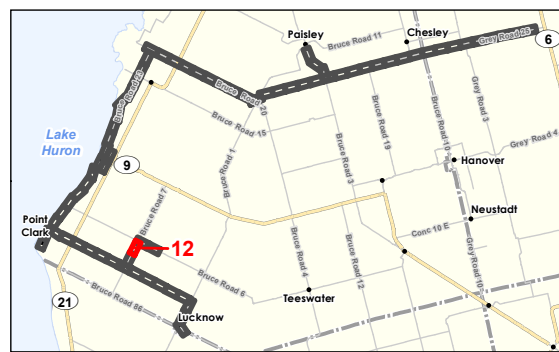
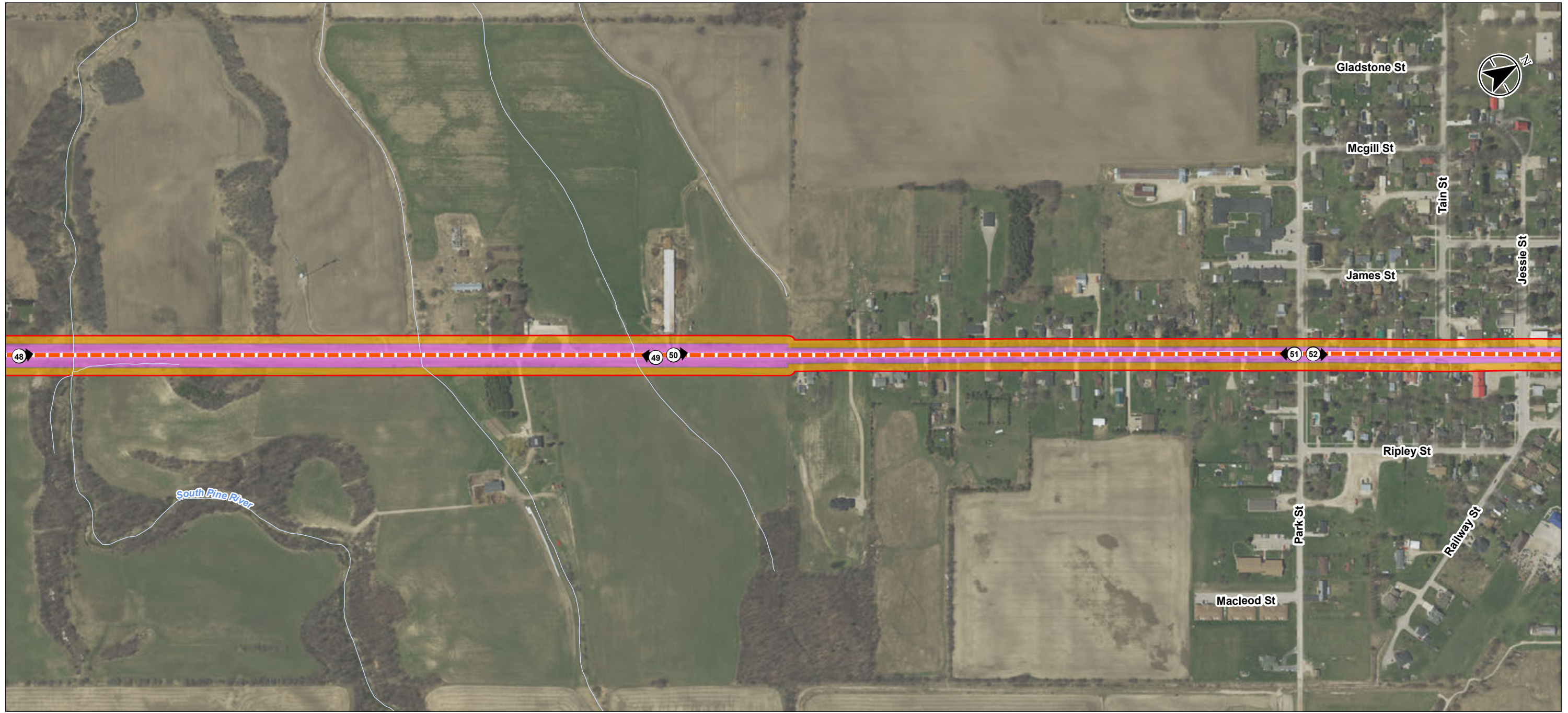


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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-11**

Title: **Results Index – Stage 1 Property Inspection Results**

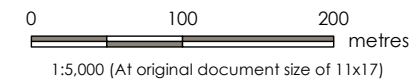


Legend

- - - Preliminary Preferred Route
- Study Area
- No Potential (Disturbed)
- Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
- Major Road
- Minor Road
- Watercourse

Notes

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 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

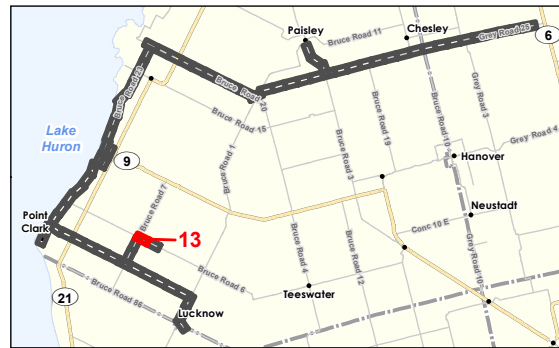
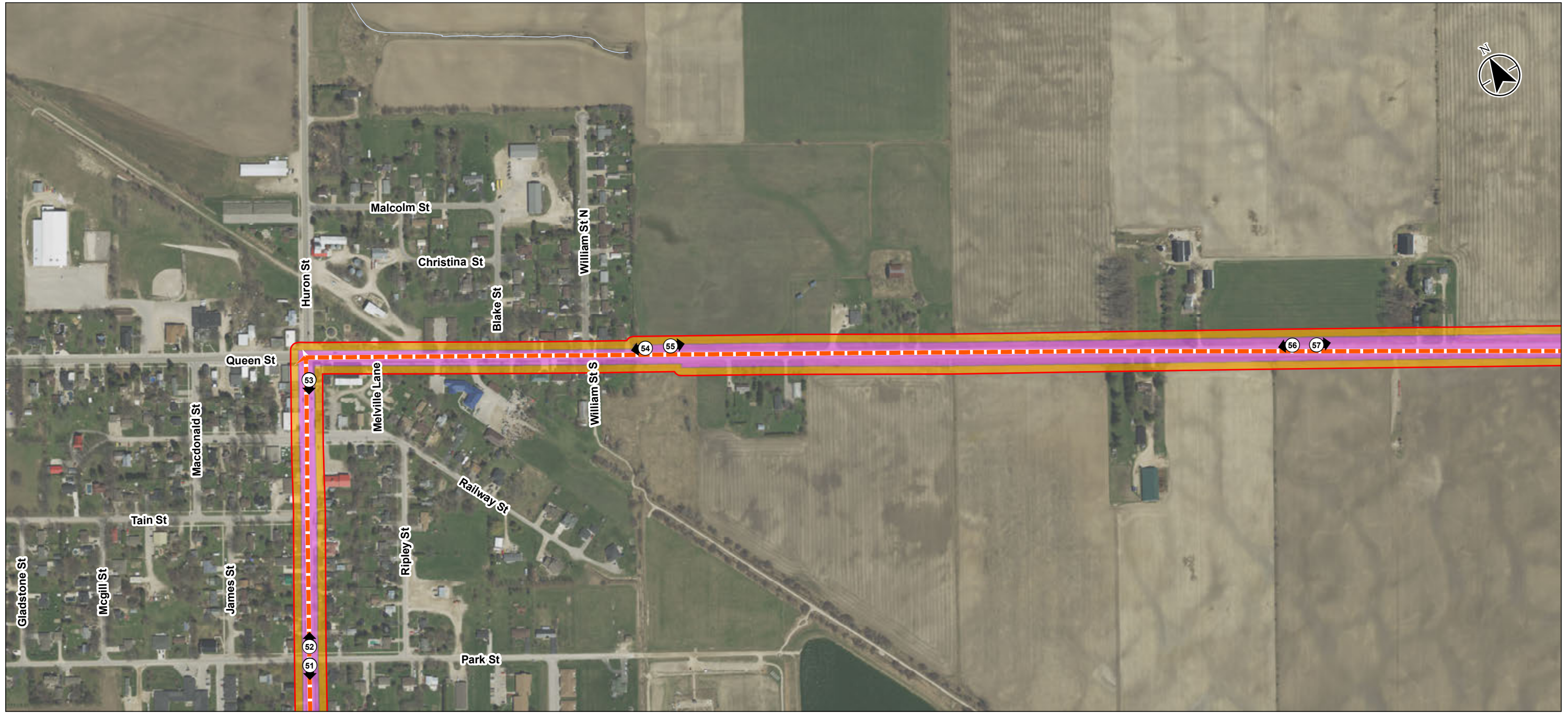
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5-12

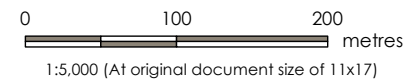
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Results Index – Stage 1 Property Inspection Results

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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse



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 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

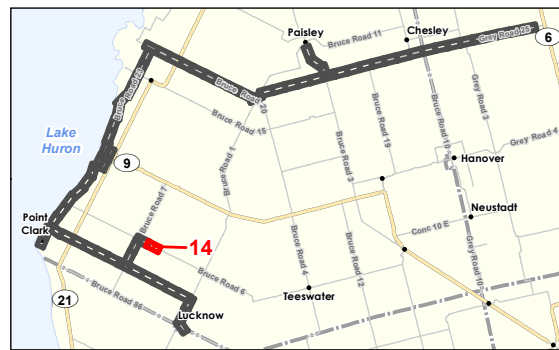
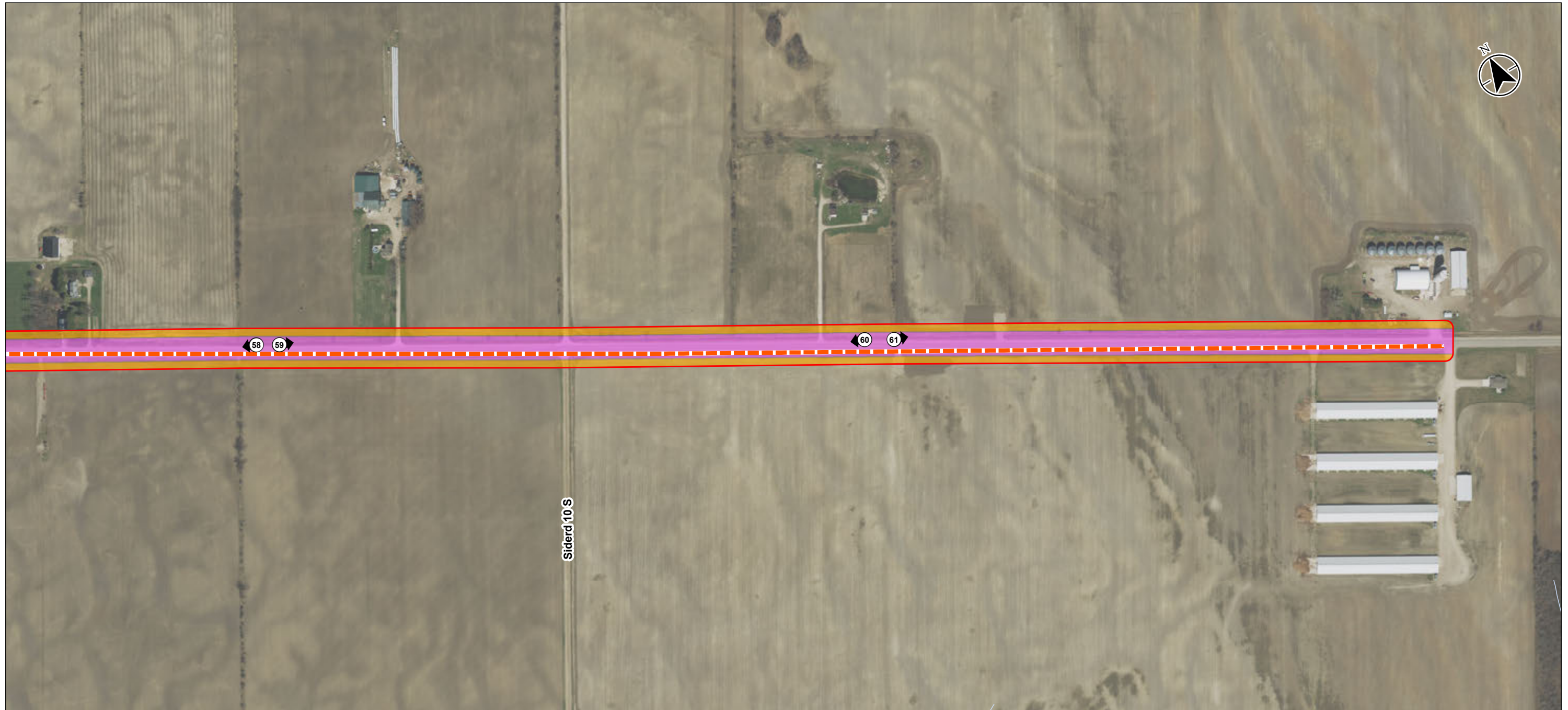
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Title: **Results Index – Stage 1 Property Inspection Results**

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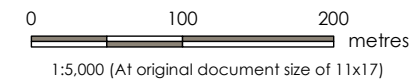
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- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse

- Notes**
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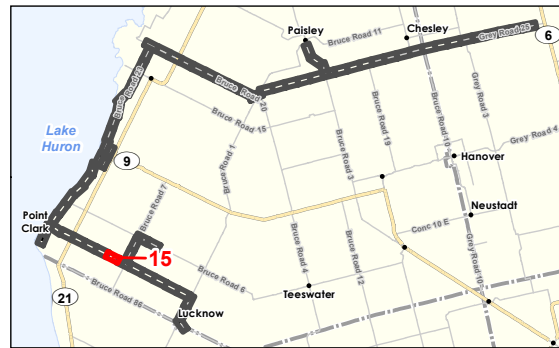
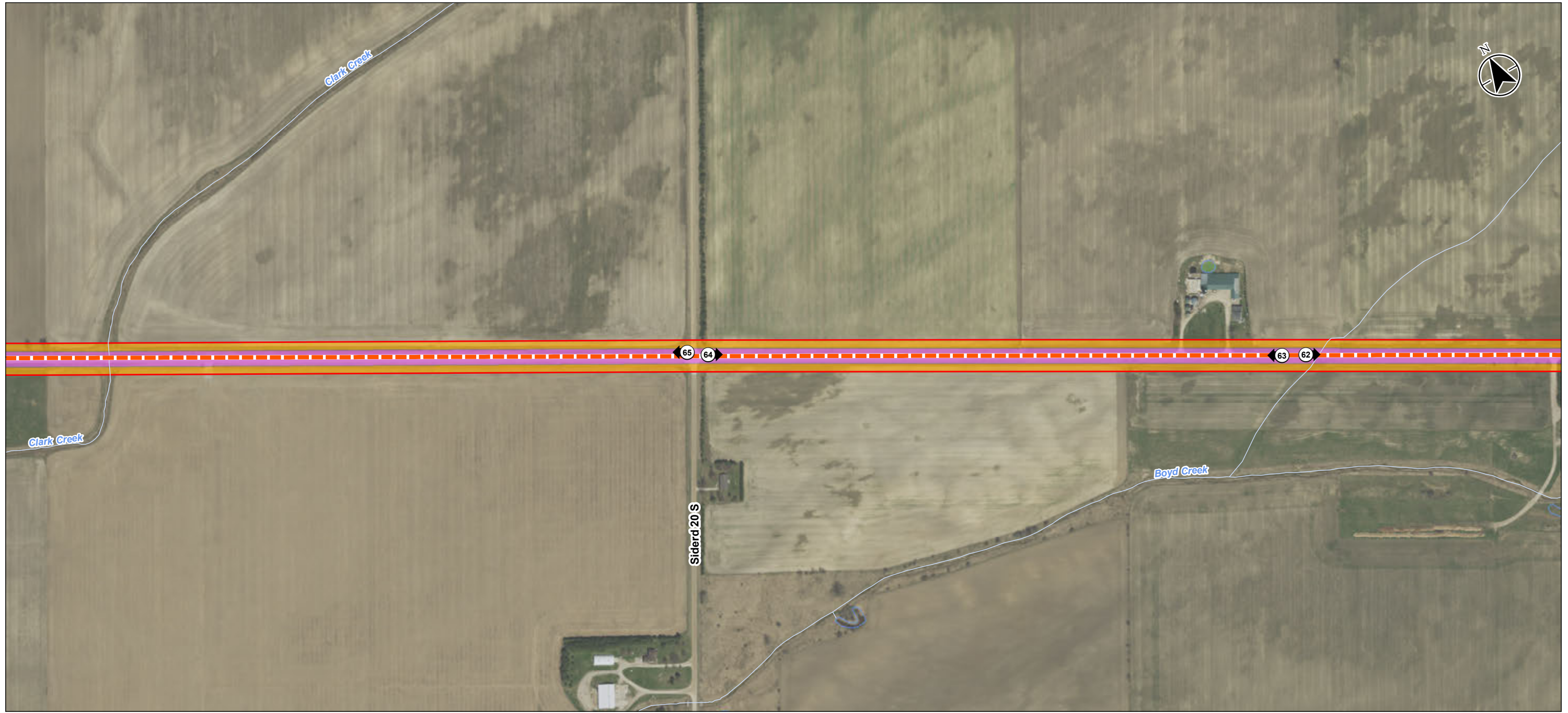
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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-14**

Title: **Results Index – Stage 1 Property Inspection Results**

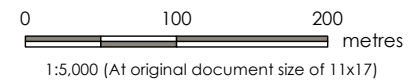
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- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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3. Orthoimagery © MNRF, 2015. Imagery Date, 2015.

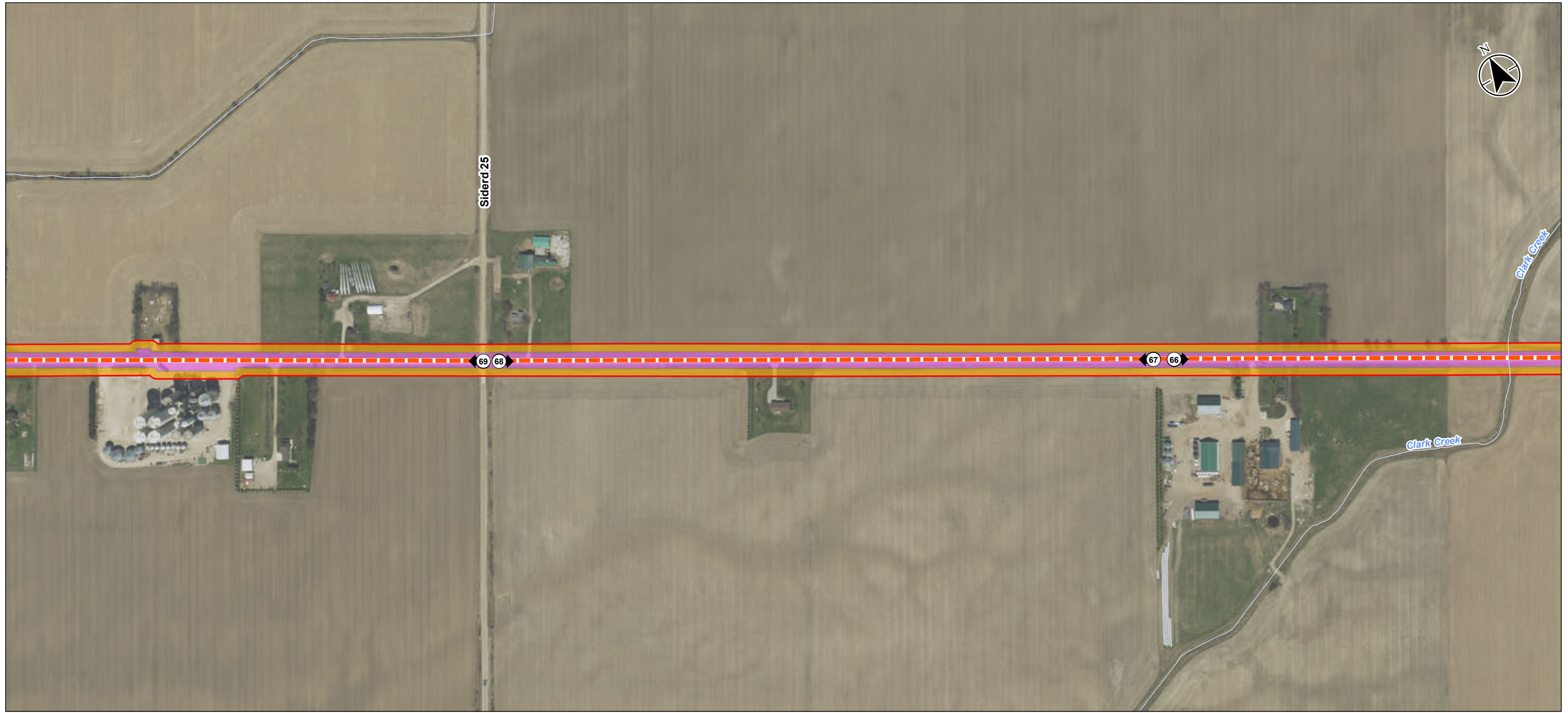


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 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-15**

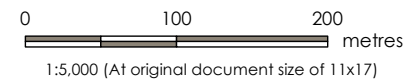
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse

Notes

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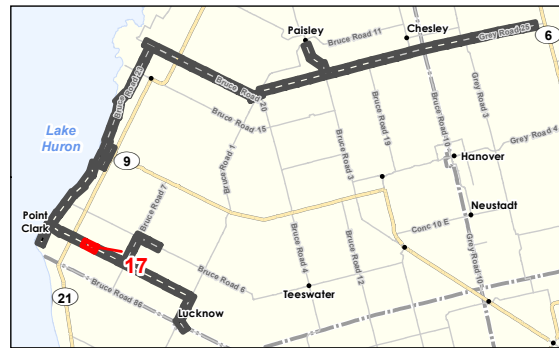
Project Location: Counties Of Bruce, Grey and Huron
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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-16**

Title: **Results Index – Stage 1 Property Inspection Results**

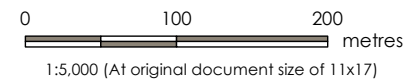
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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse

Notes

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3. Orthoimagery © MNRF, 2015. Imagery Date, 2015.



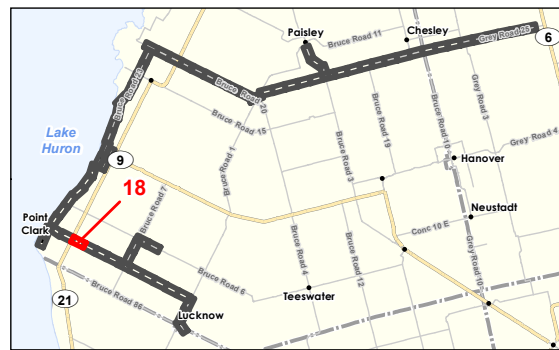
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 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

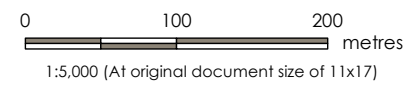
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Title
Results Index – Stage 1 Property Inspection Results

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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Expressway / Highway
 - Minor Road
 - Watercourse



Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13
 160950831 REVA

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-18**

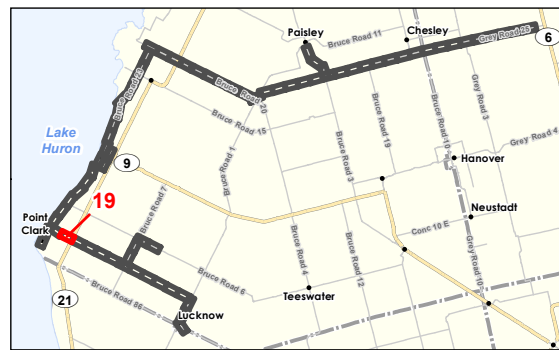
Title: **Results Index – Stage 1 Property Inspection Results**

Notes

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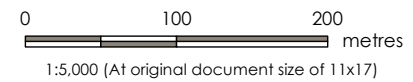
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- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Expressway / Highway
 - Minor Road
 - Watercourse

Notes

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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-19**

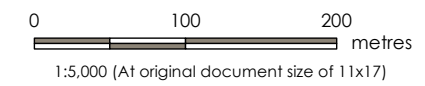
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - Deep Potential on account of Sand Dunes (Requires Stage 2 deep-testing)
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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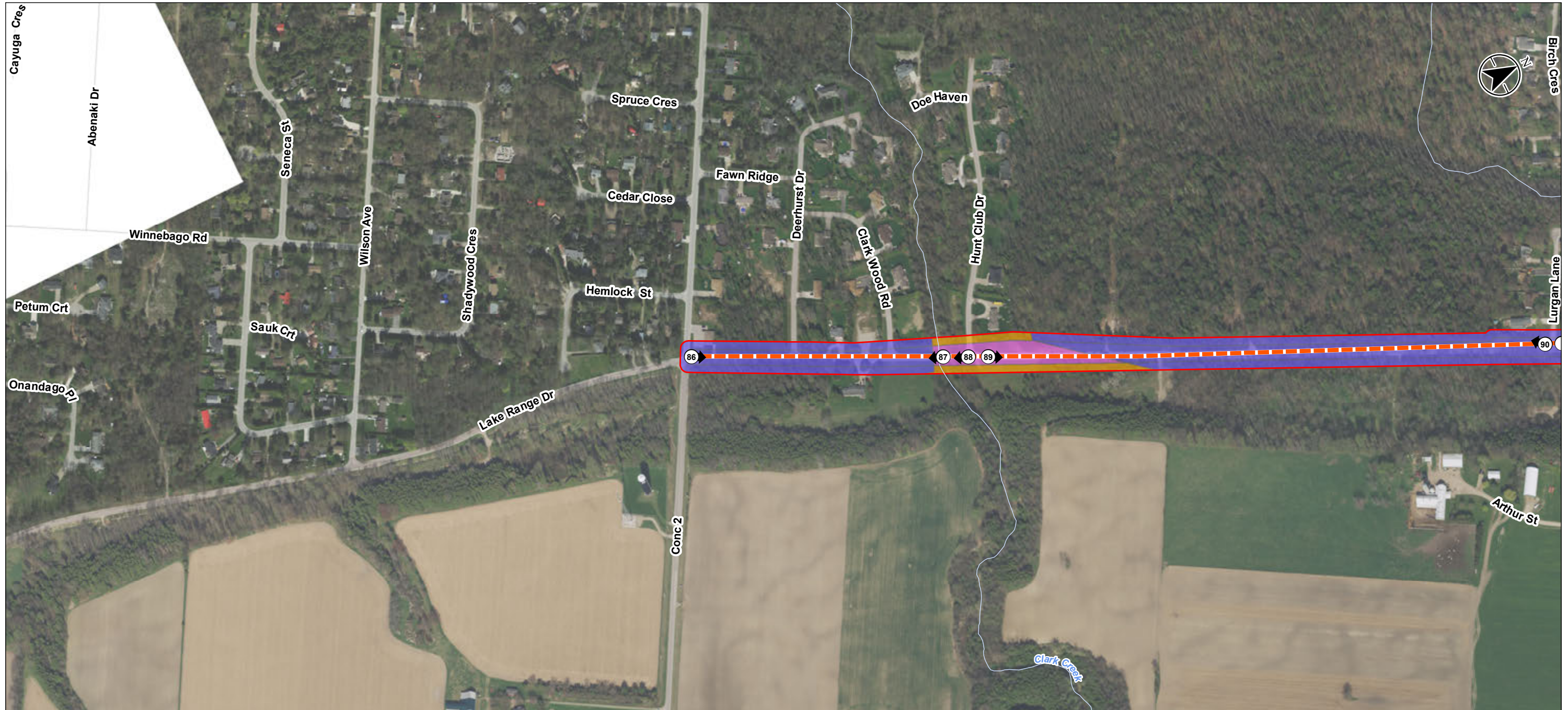


Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
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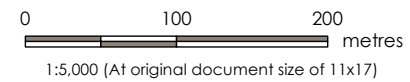
Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-20**

Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - Deep Potential on account of Sand Dunes (Requires Stage 2 deep-testing)
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse



Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

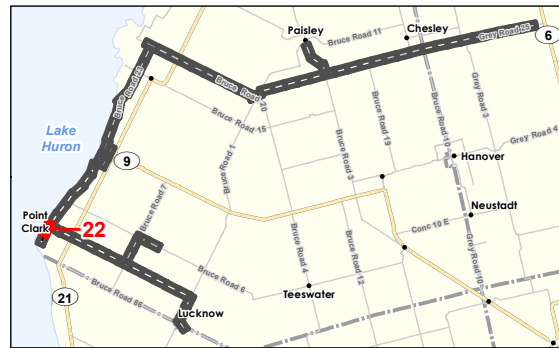
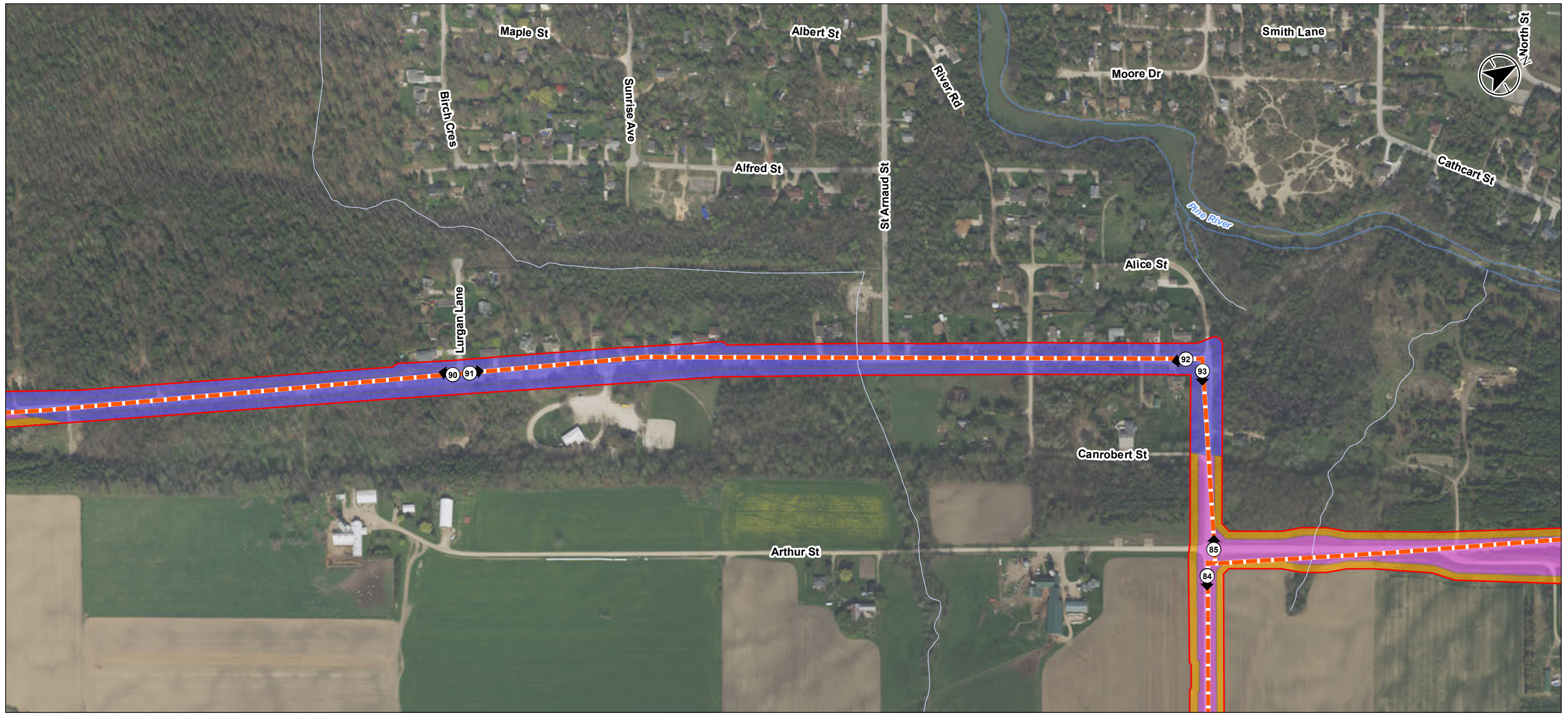
Figure No. **5-21**

Title: **Results Index – Stage 1 Property Inspection Results**

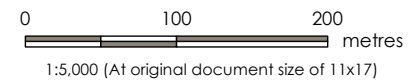
- Notes**
1. Coordinate System: NAD 1983 UTM Zone 17N
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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - Deep Potential on account of Sand Dunes (Requires Stage 2 deep-testing)
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse
 - Waterbody



Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-22**

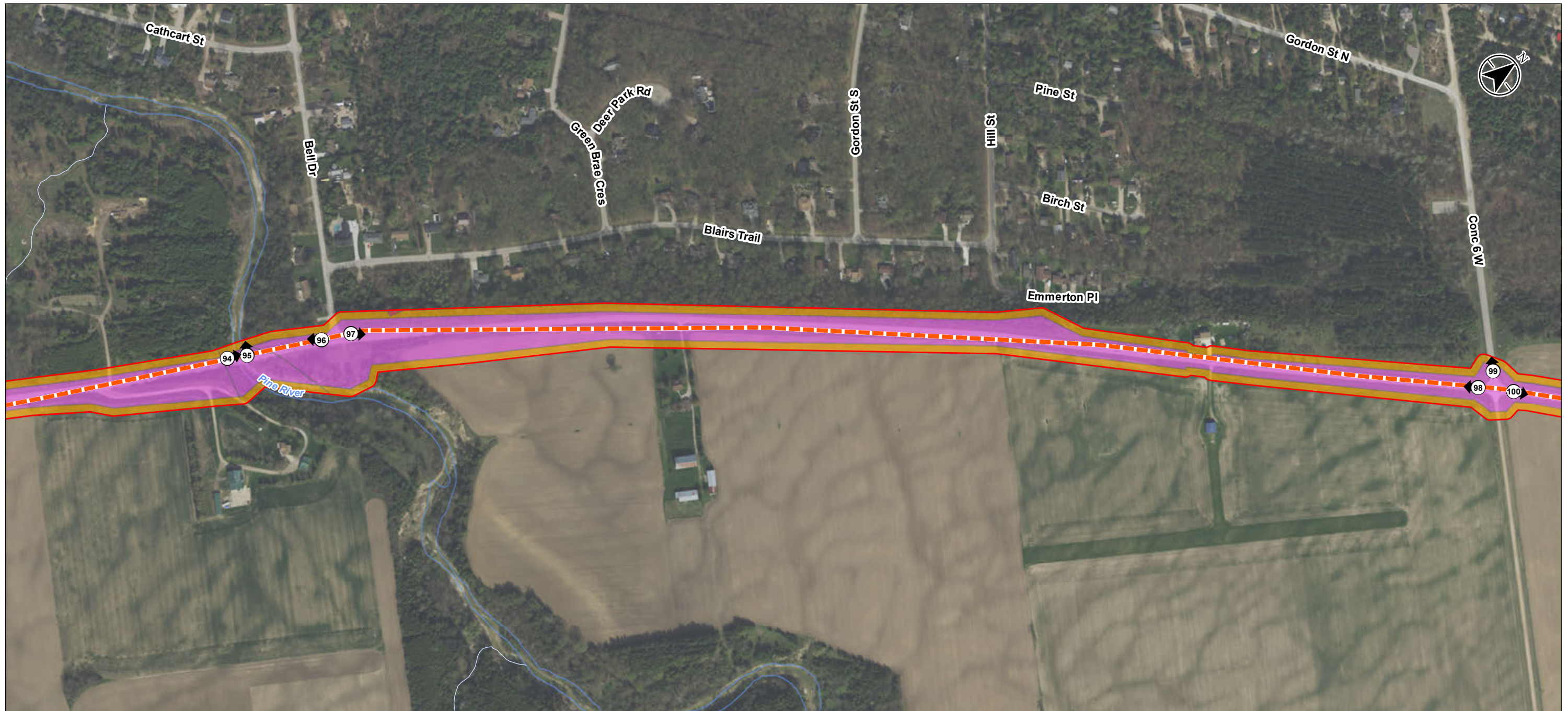
Title: **Results Index – Stage 1 Property Inspection Results**

Notes

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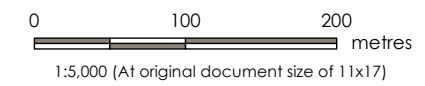
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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - Potential for near-surface capped topsoil (Requires Stage 2 Test-pit survey at a 5m interval within ROW)
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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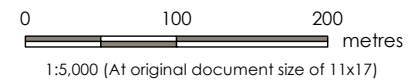
Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-23**

Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse
 - Waterbody



Project Location: Counties Of Bruce, Grey and Huron
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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-24**

Title: **Results Index – Stage 1 Property Inspection Results**

- Notes**
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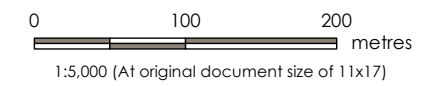
\\cd1215-r01\work_group\01_60950831\planning\drawing\MXD\Archaeology\Stage_1\Fig05_Results_Stage1_Mapbook.mxd Reviewed: 2018-12-17 By: s.searles



- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-25**

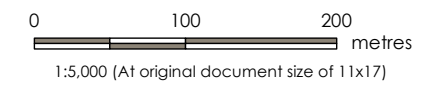
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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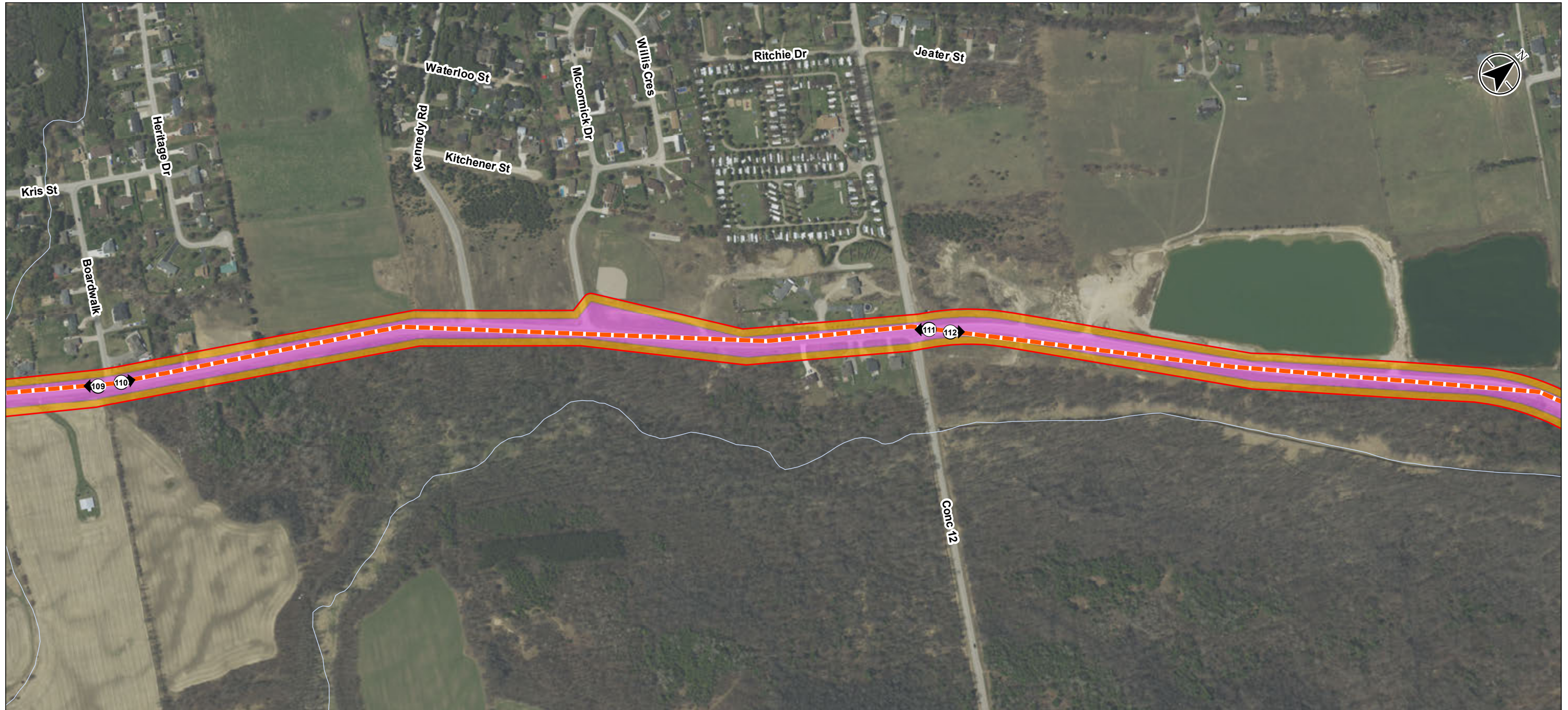


Project Location: Counties Of Bruce, Grey and Huron
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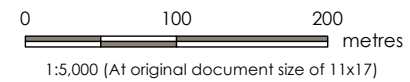
Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-26**

Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse



Project Location: Counties Of Bruce, Grey and Huron
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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

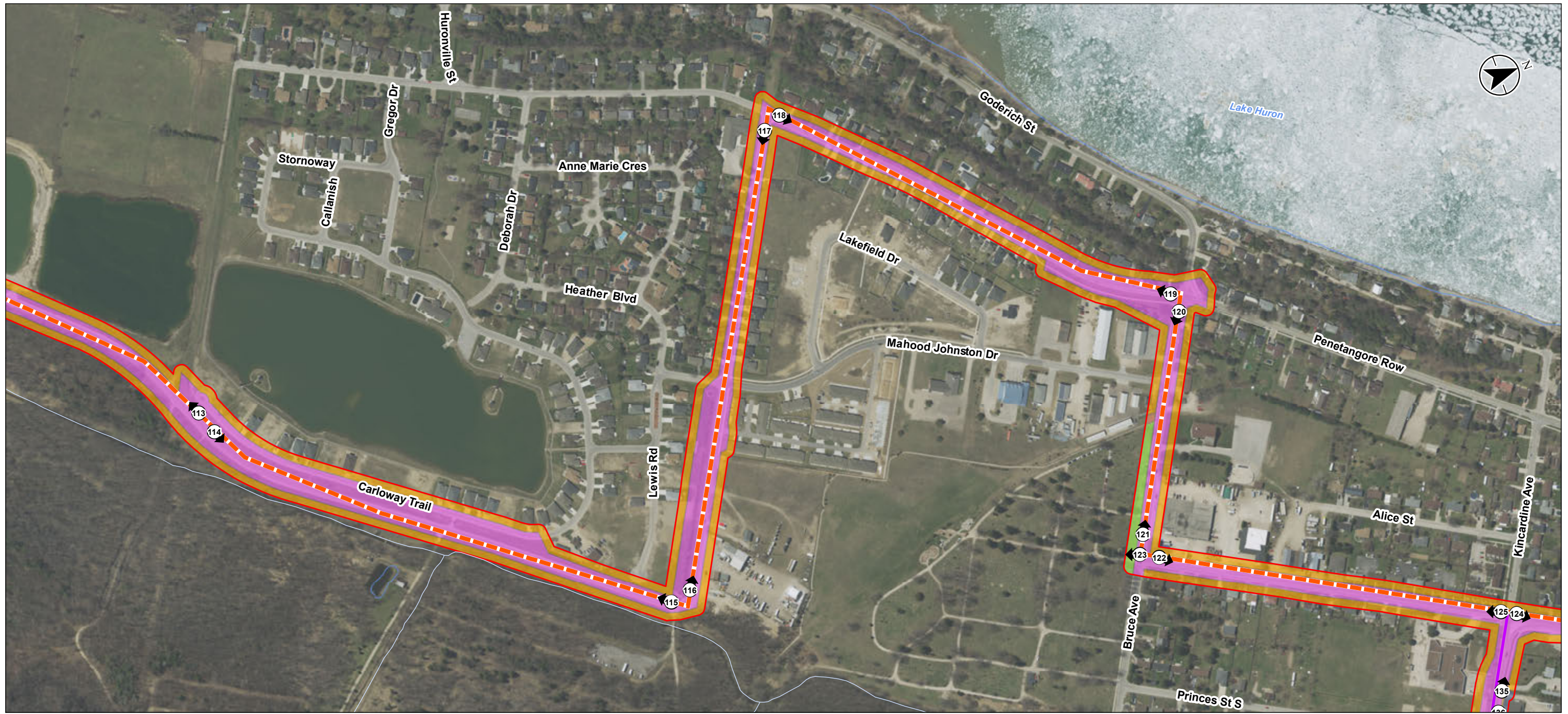
Figure No.: **5-27**

Title: **Results Index – Stage 1 Property Inspection Results**

- Notes**
1. Coordinate System: NAD 1983 UTM Zone 17N
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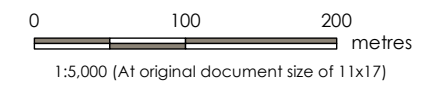
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Legend

- Preliminary Preferred Route
- Kincardine Bypass
- Study Area
- Cemetery (Requires Avoidance)
- Requires Stage 3 Cemetery Investigation
- No Potential (Disturbed)
- Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
- Previously Assessed (MHCI 2013)
- Major Road
- Minor Road
- Watercourse
- Waterbody



Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-28**

Title: **Results Index – Stage 1 Property Inspection Results**

Notes

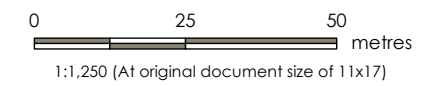
- Coordinate System: NAD 1983 UTM Zone 17N
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 Revised: 2018-12-17 By: s.e.s.



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - Cemetery (Requires Avoidance)
 - Requires Stage 3 Cemetery Investigation
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road



Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-29**

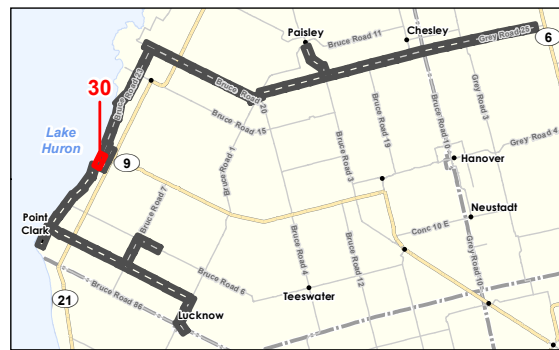
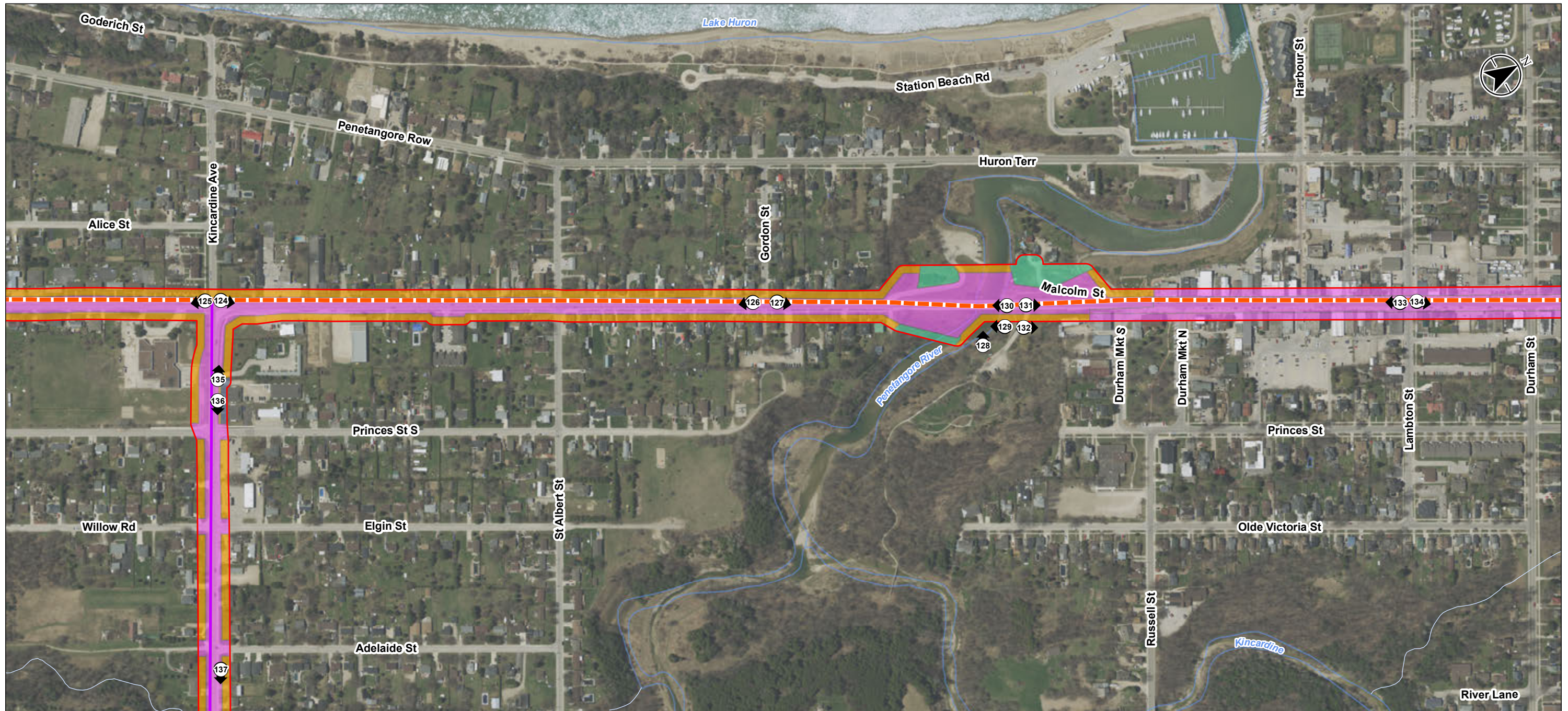
Title: **Results Index – Stage 1 Property Inspection Results**

Notes

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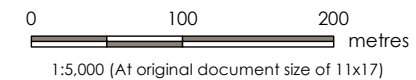
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Legend

- - - Preliminary Preferred Route
- Kincardine Bypass
- Study Area
- Deep Potential on account of alluvial deposits (Requires Stage 2 deep-testing)
- No Potential (Disturbed)
- Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
- Previously Assessed (MHCI 2013)
- Major Road
- Minor Road
- Watercourse
- Waterbody

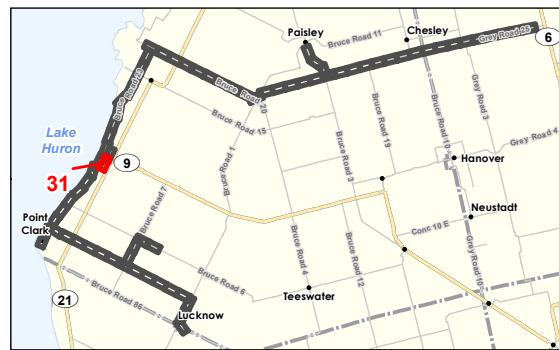
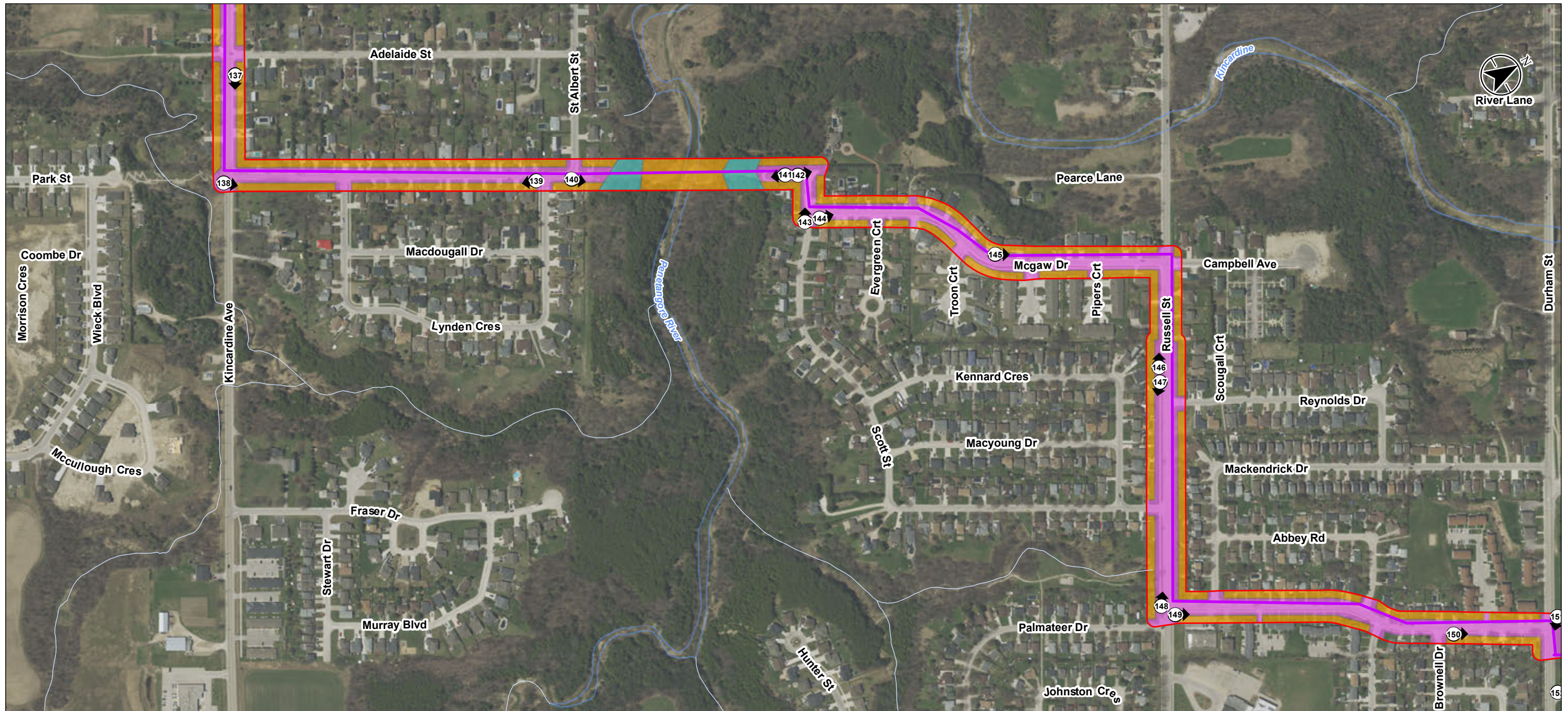


Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-30**

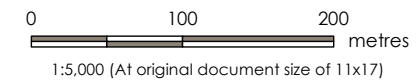
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- Kincardine Bypass
 - Study Area
 - No Potential (Steeply Sloped)
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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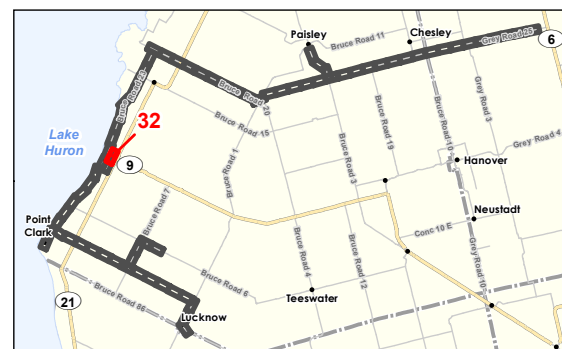
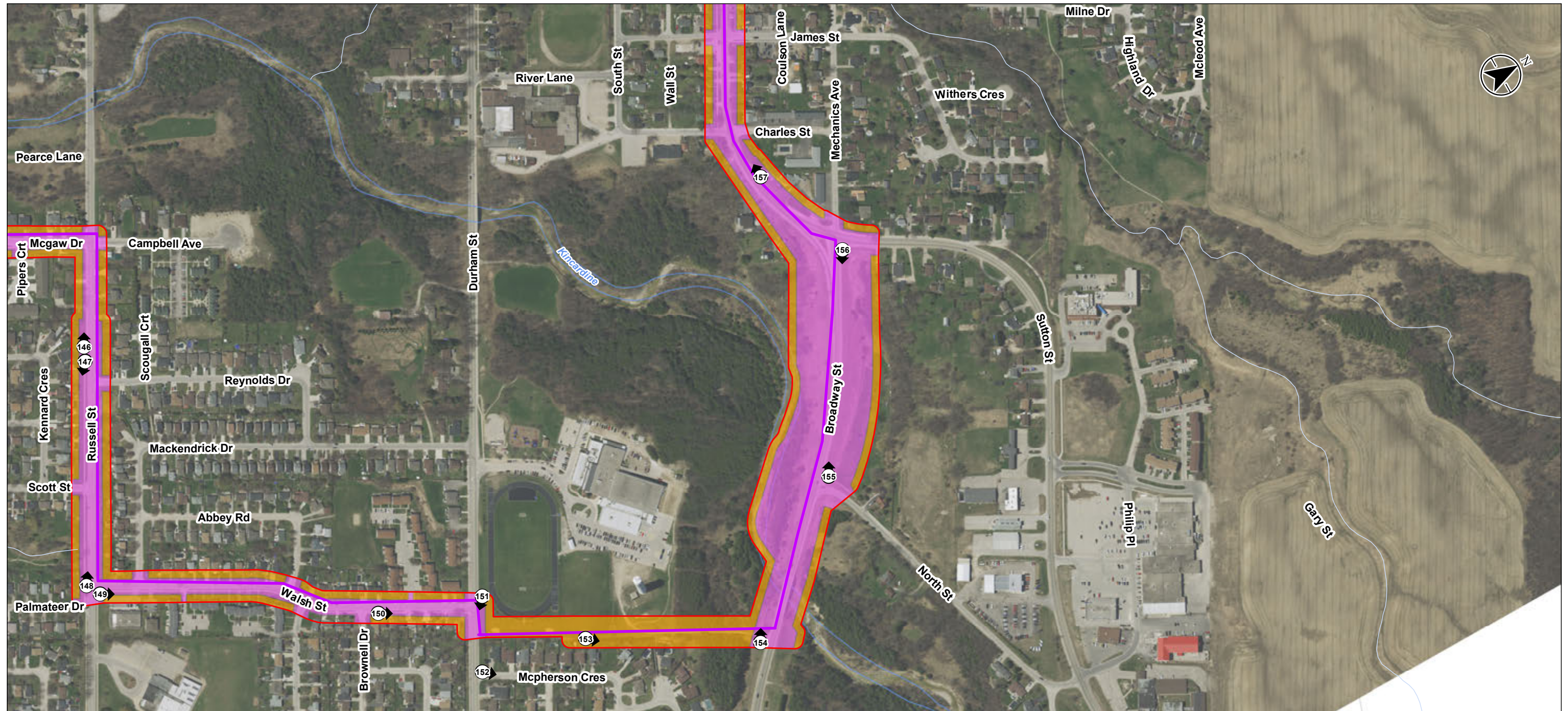


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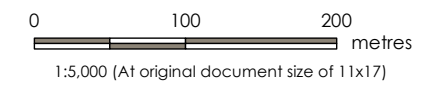
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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-31**

Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- Kincardine Bypass
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody



Project Location: Counties Of Bruce, Grey and Huron
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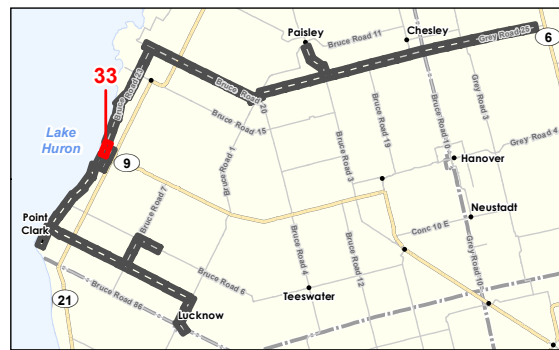
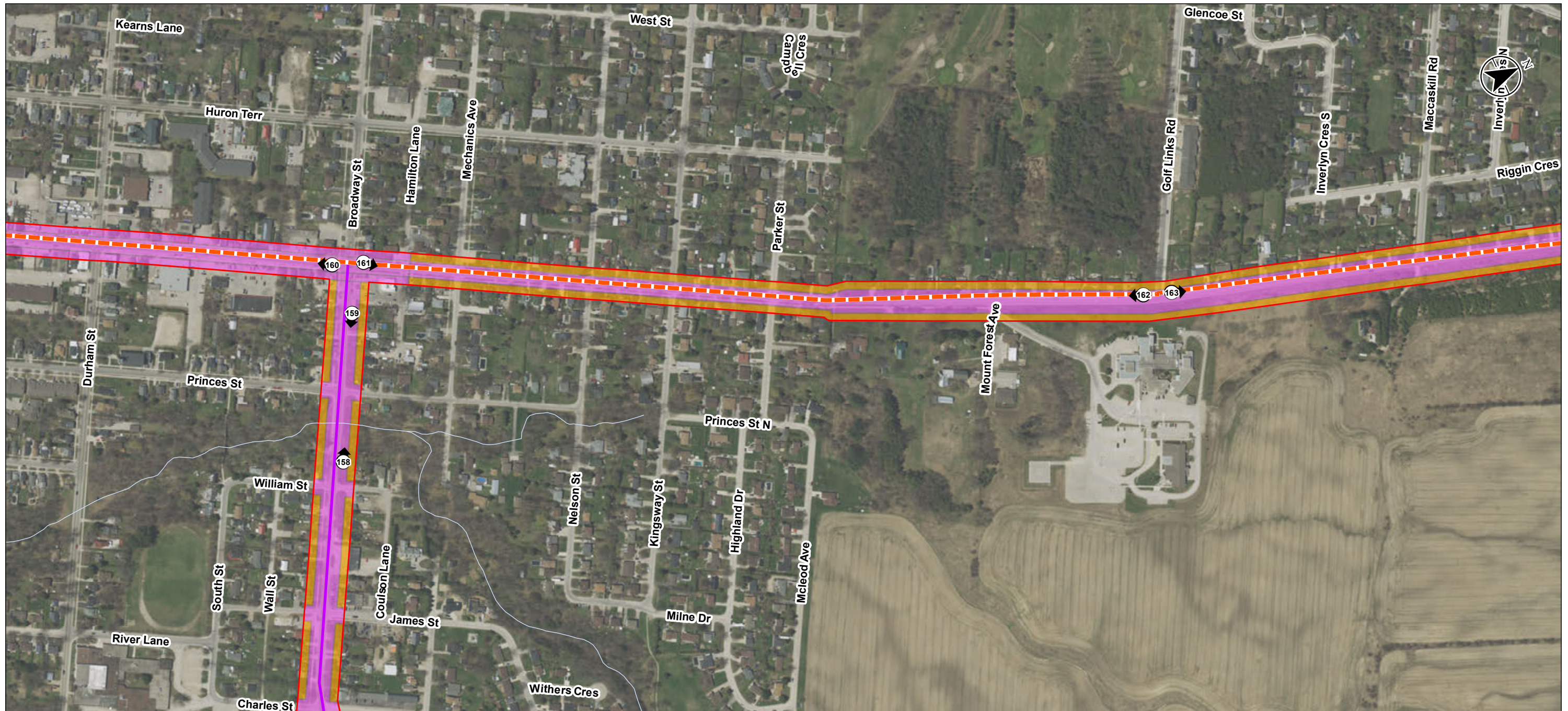
Figure No.: **5-32**

Title: **Results Index – Stage 1 Property Inspection Results**

Notes

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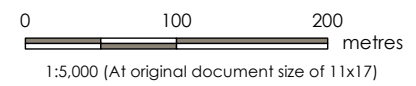
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- Legend**
- - - Preliminary Preferred Route
 - Kincardine Bypass
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse

Notes

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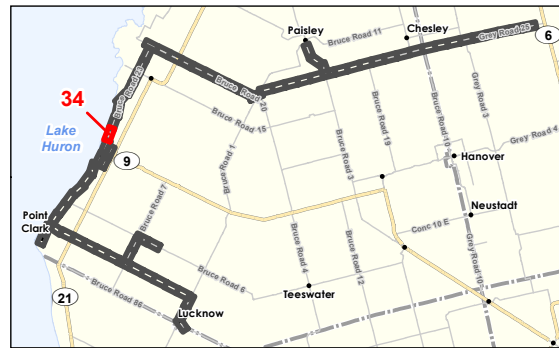
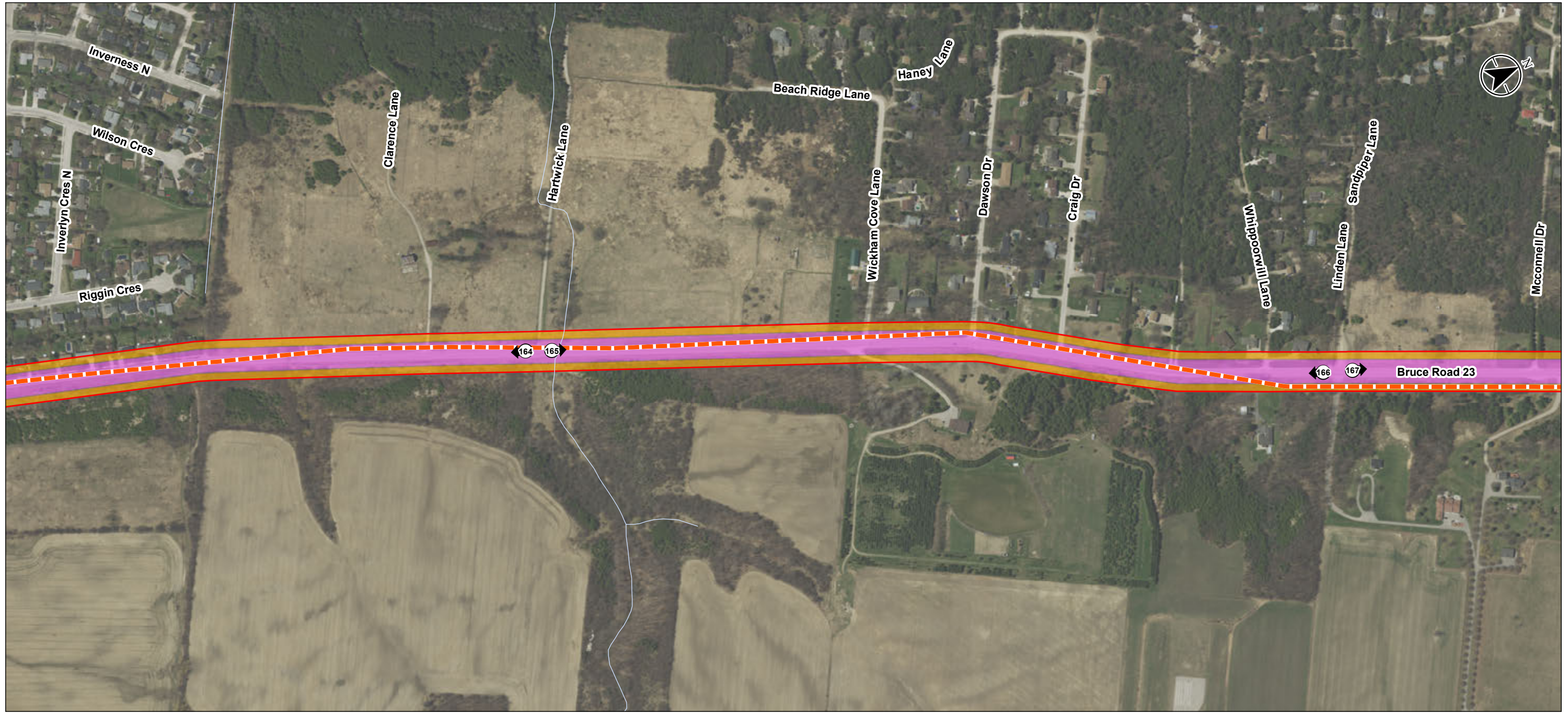


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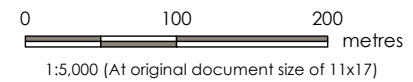
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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-33**

Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse



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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

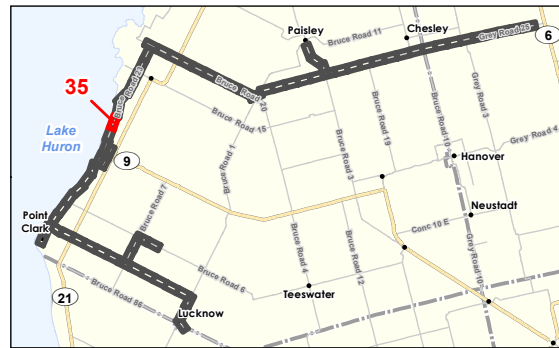
Figure No. **5-34**

Title: **Results Index – Stage 1 Property Inspection Results**

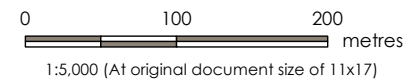
- Notes**
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- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody



Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13
 160950831 REVA

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

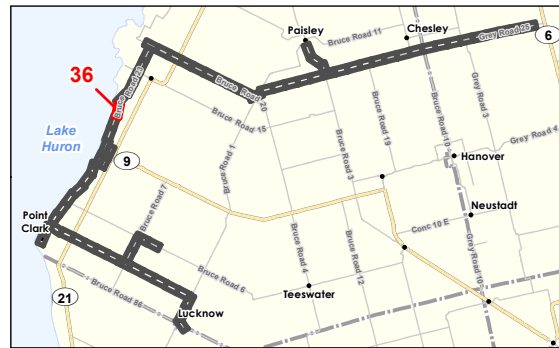
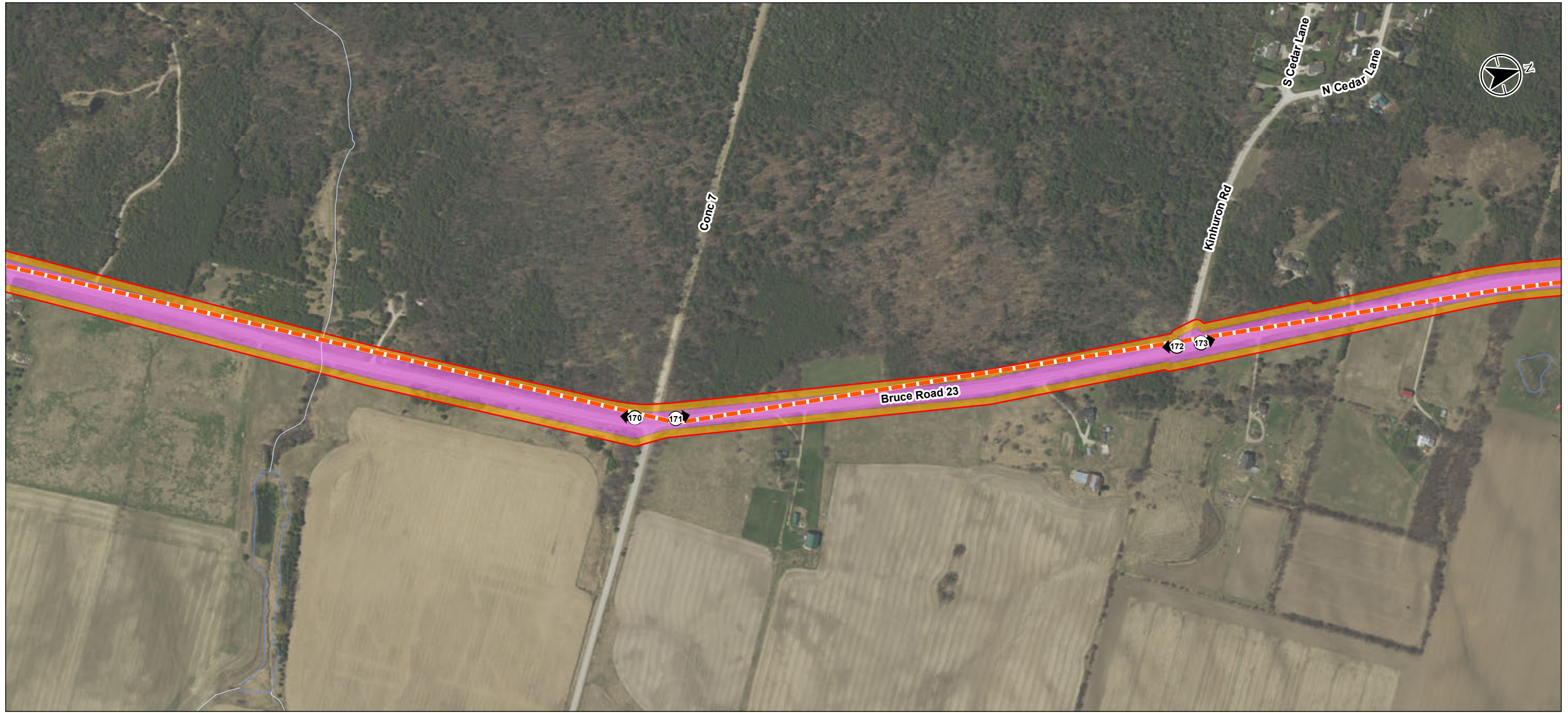
Figure No.: **5-35**

Title: **Results Index – Stage 1 Property Inspection Results**

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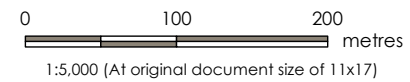
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- Legend**
- — — Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

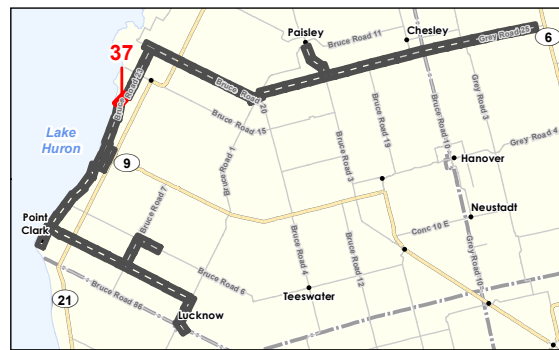
Figure No.

5-36

Title

Results Index – Stage 1 Property Inspection Results

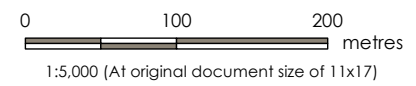
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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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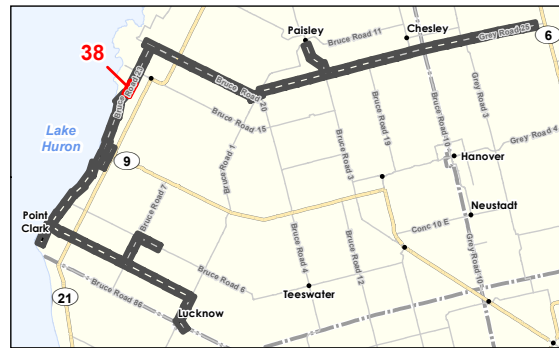
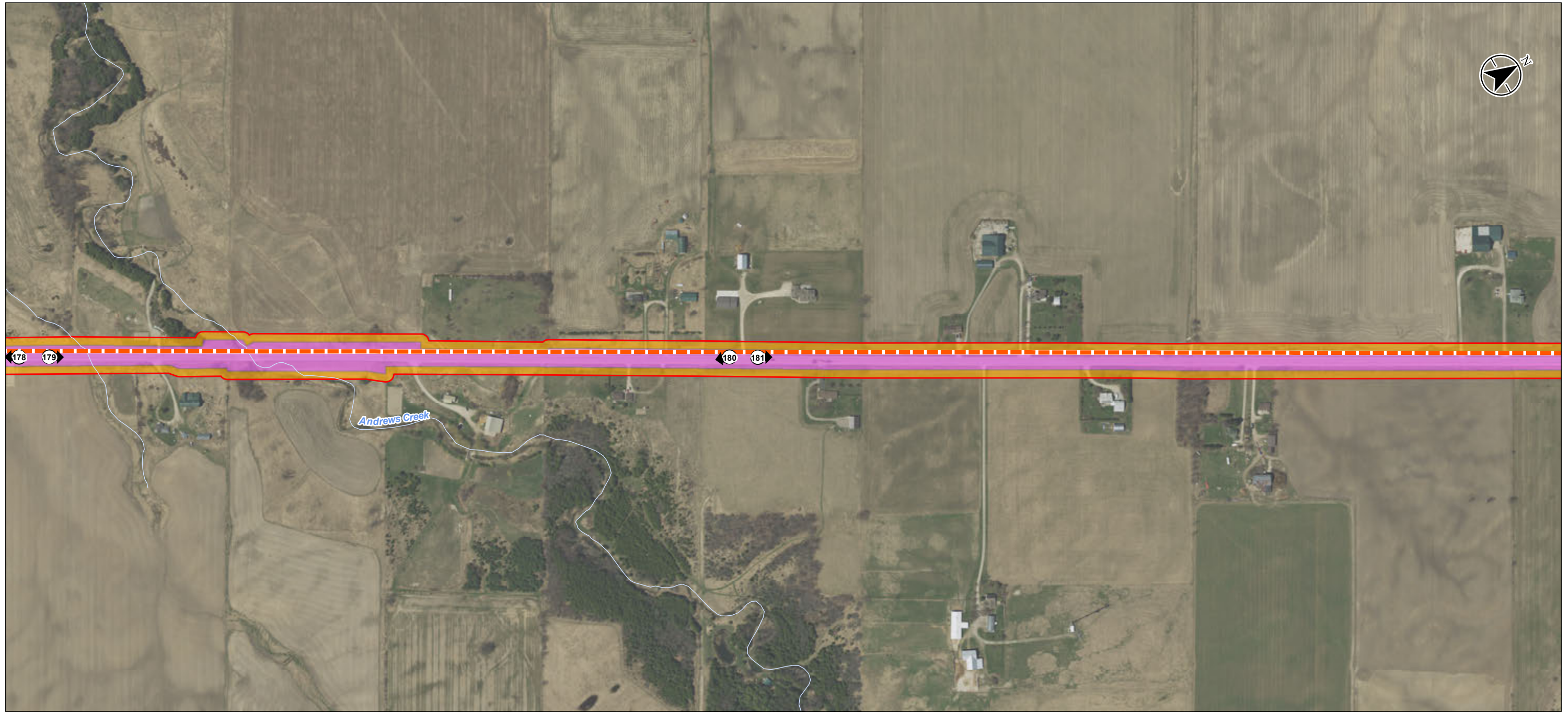


Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-37**

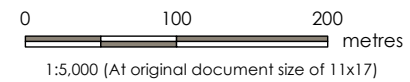
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Watercourse

Notes

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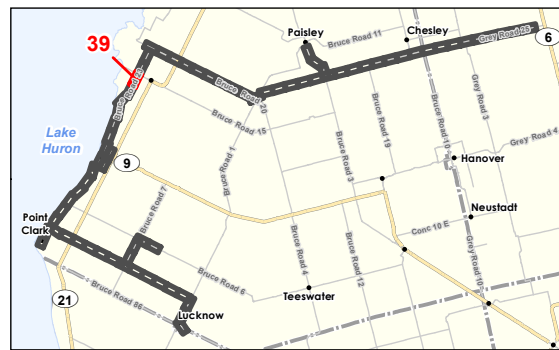
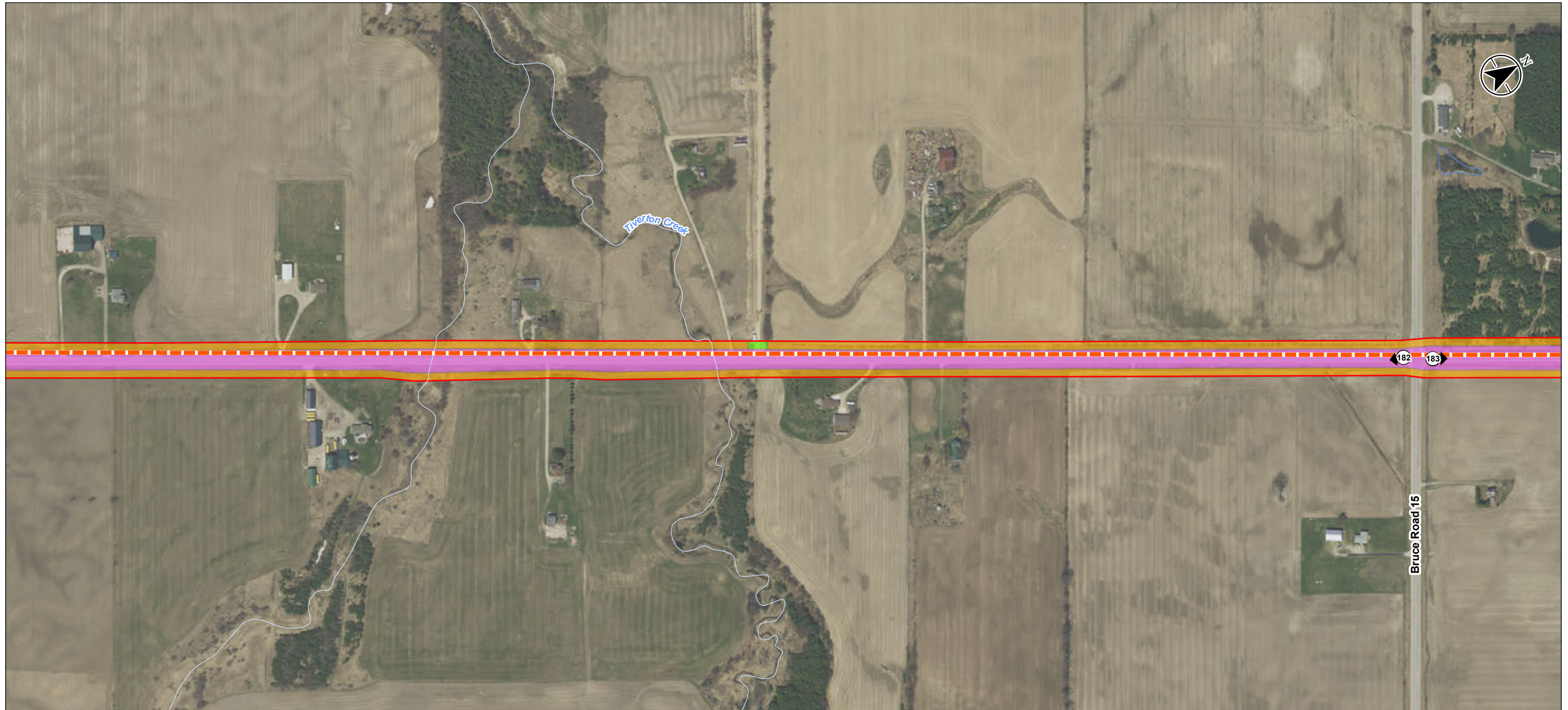
Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

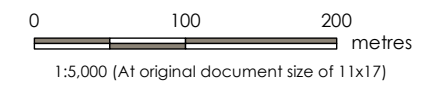
Figure No.: **5-38**

Title: **Results Index – Stage 1 Property Inspection Results**

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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Previously Assessed (DRPA 2012b)
 - Major Road
 - Watercourse
 - Waterbody



Project Location: Counties Of Bruce, Grey and Huron
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 Prepared by SPE on 2018-12-17
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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-39**

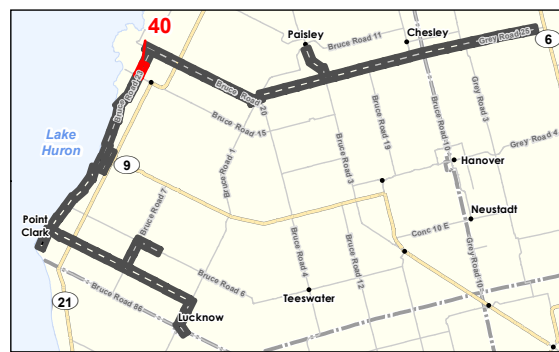
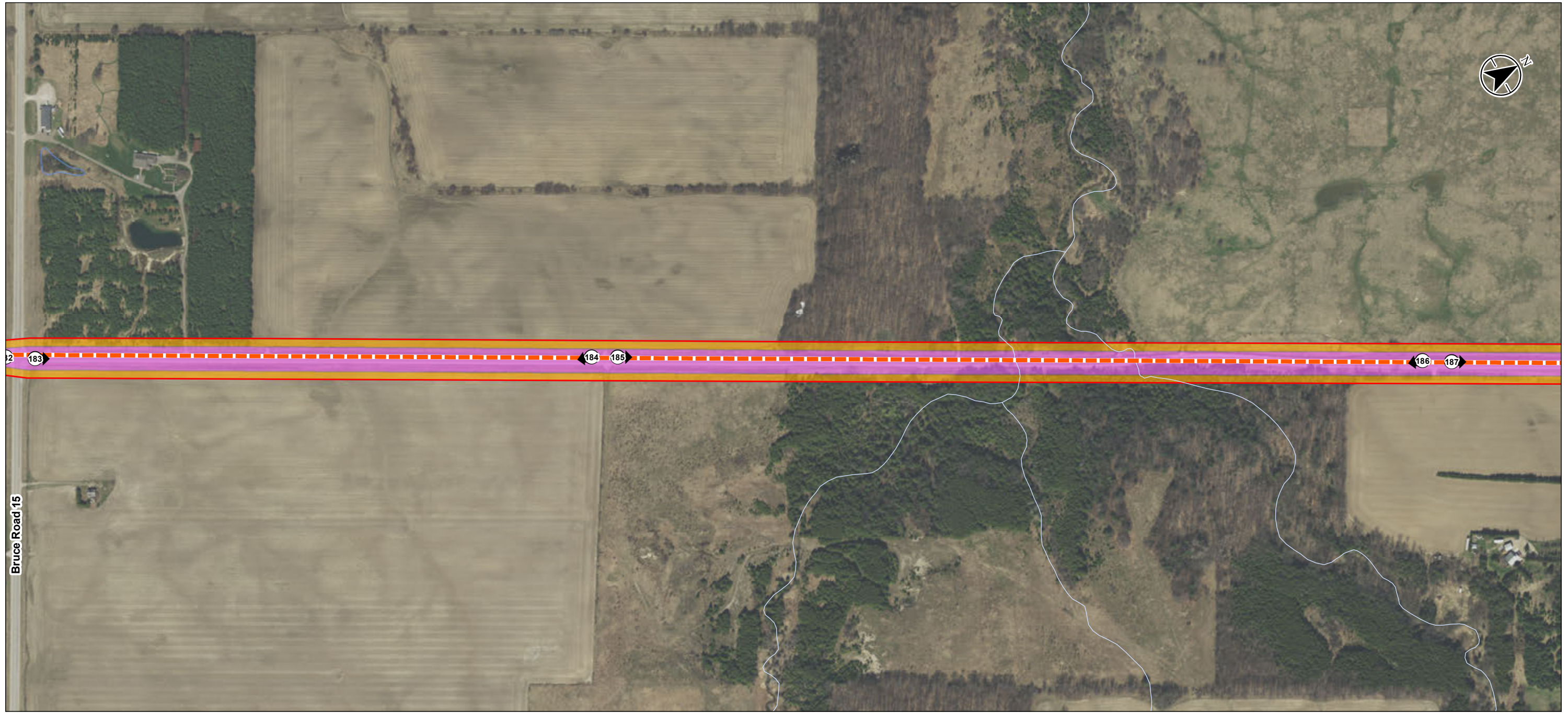
Title: **Results Index – Stage 1 Property Inspection Results**

Notes

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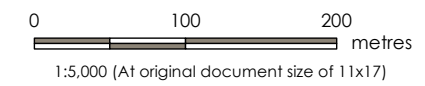
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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Watercourse
 - Waterbody

Notes

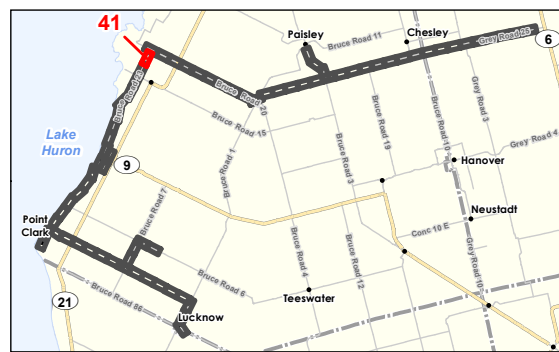
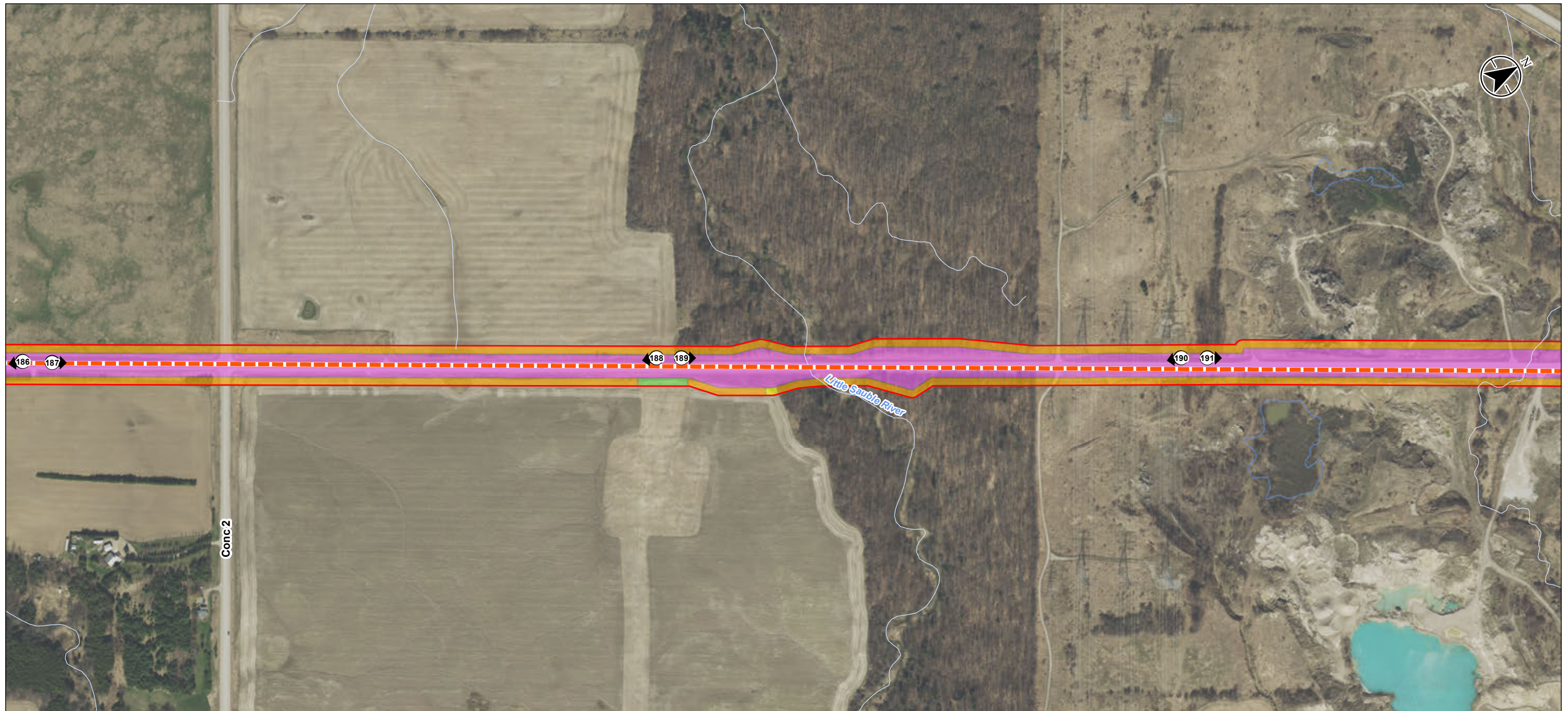
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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

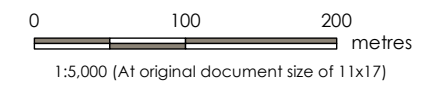
Figure No.: **5-40**
 Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Previously Assessed (DRPA 2012a)
 - Previously Assessed (DRPA 2012a; TMHCI 2014)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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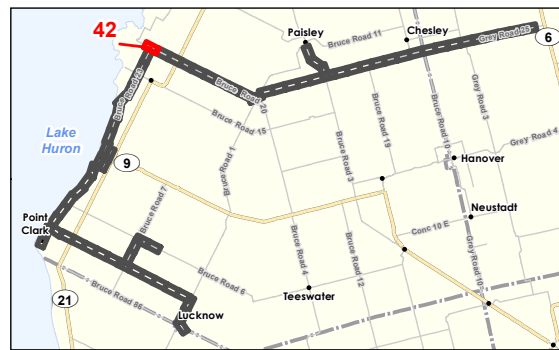
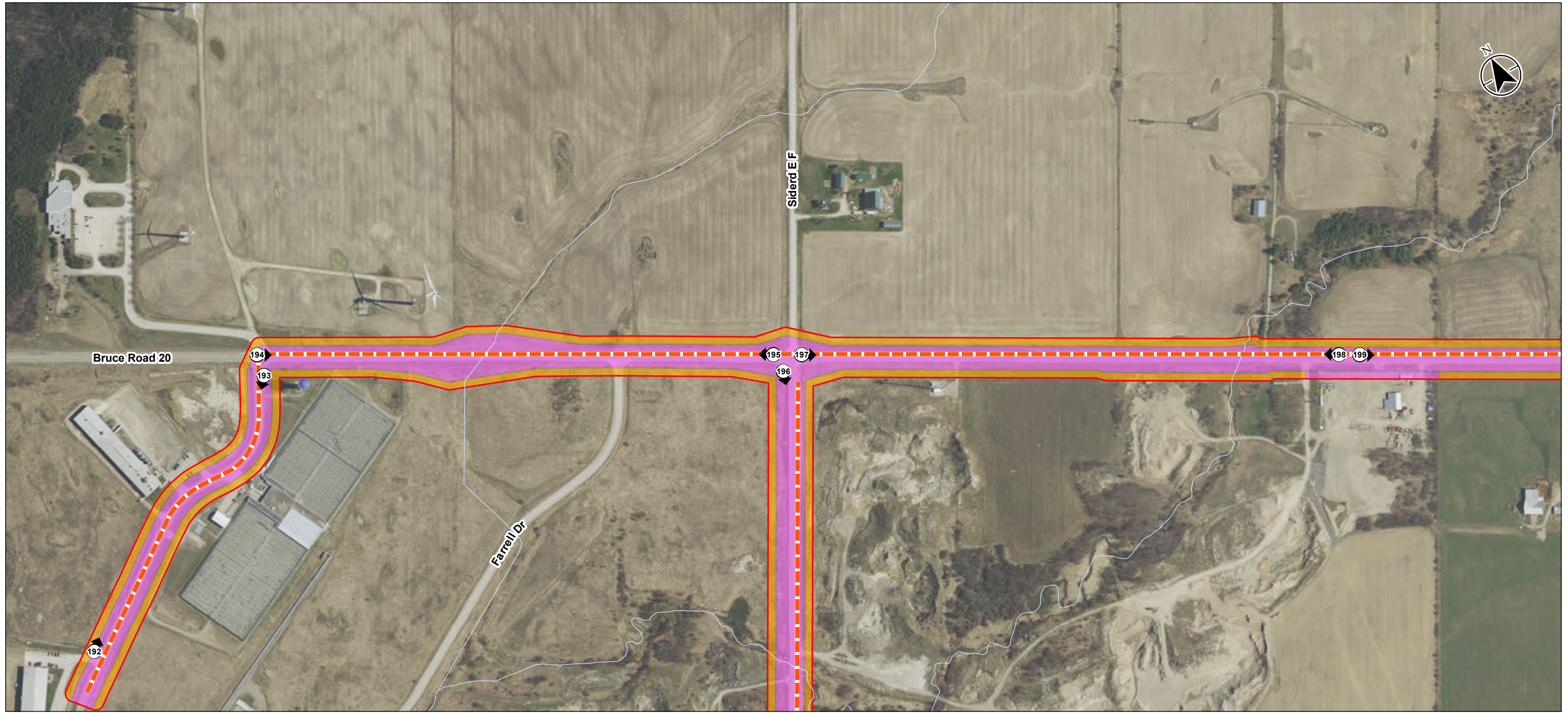


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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-41**

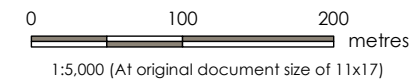
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse

Notes

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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.

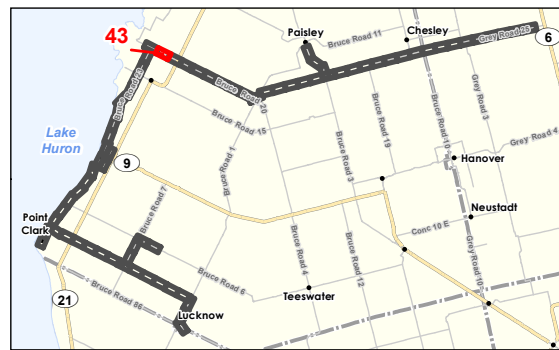
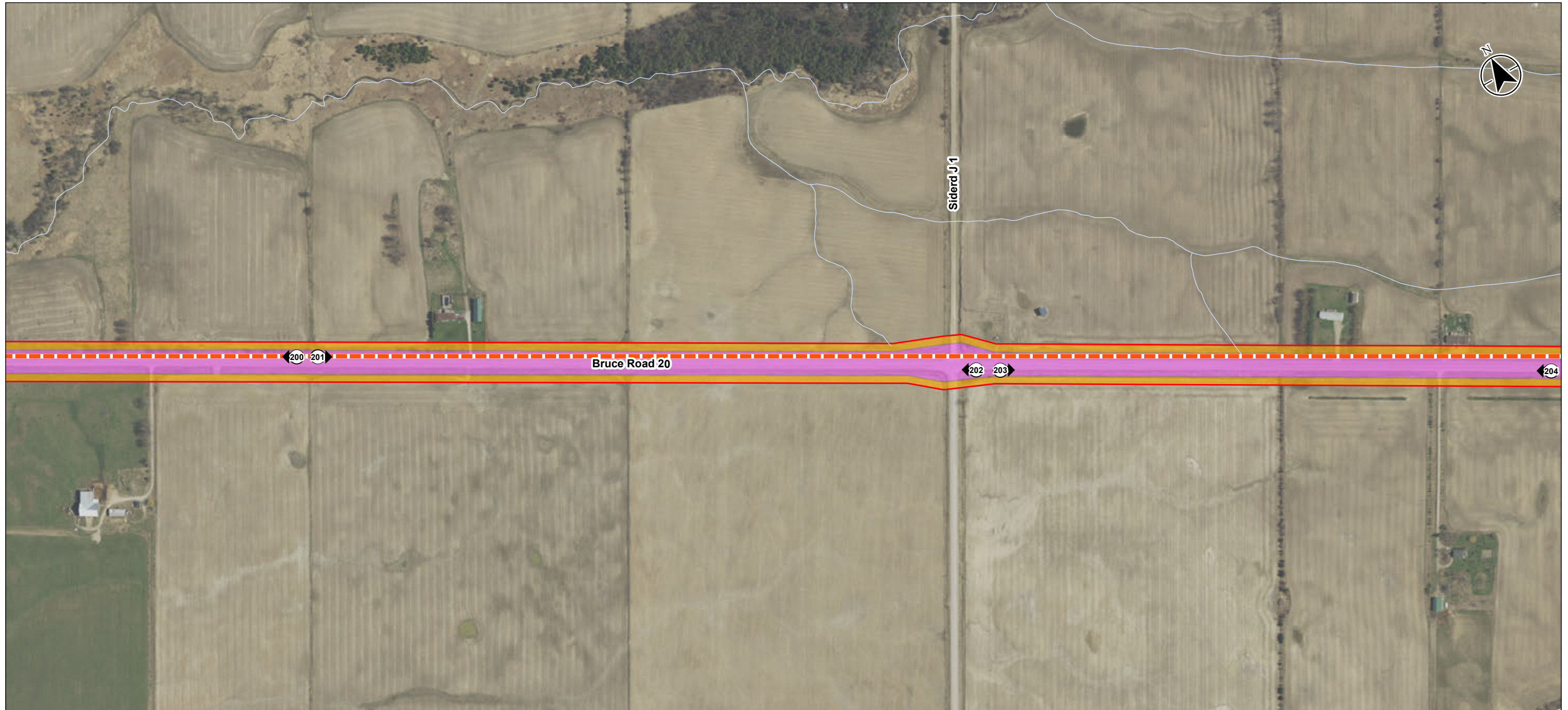
5-42

Title

Results Index – Stage 1 Property Inspection Results

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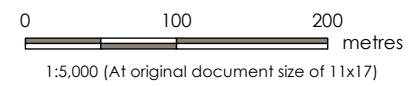
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- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse

Notes

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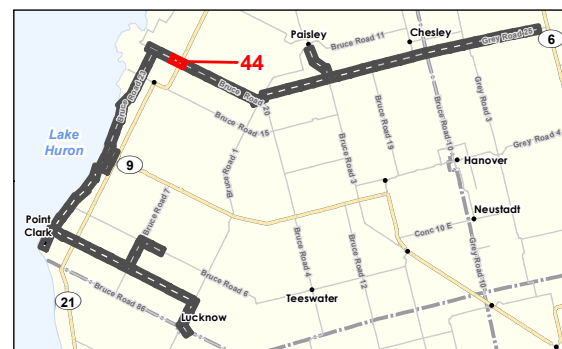
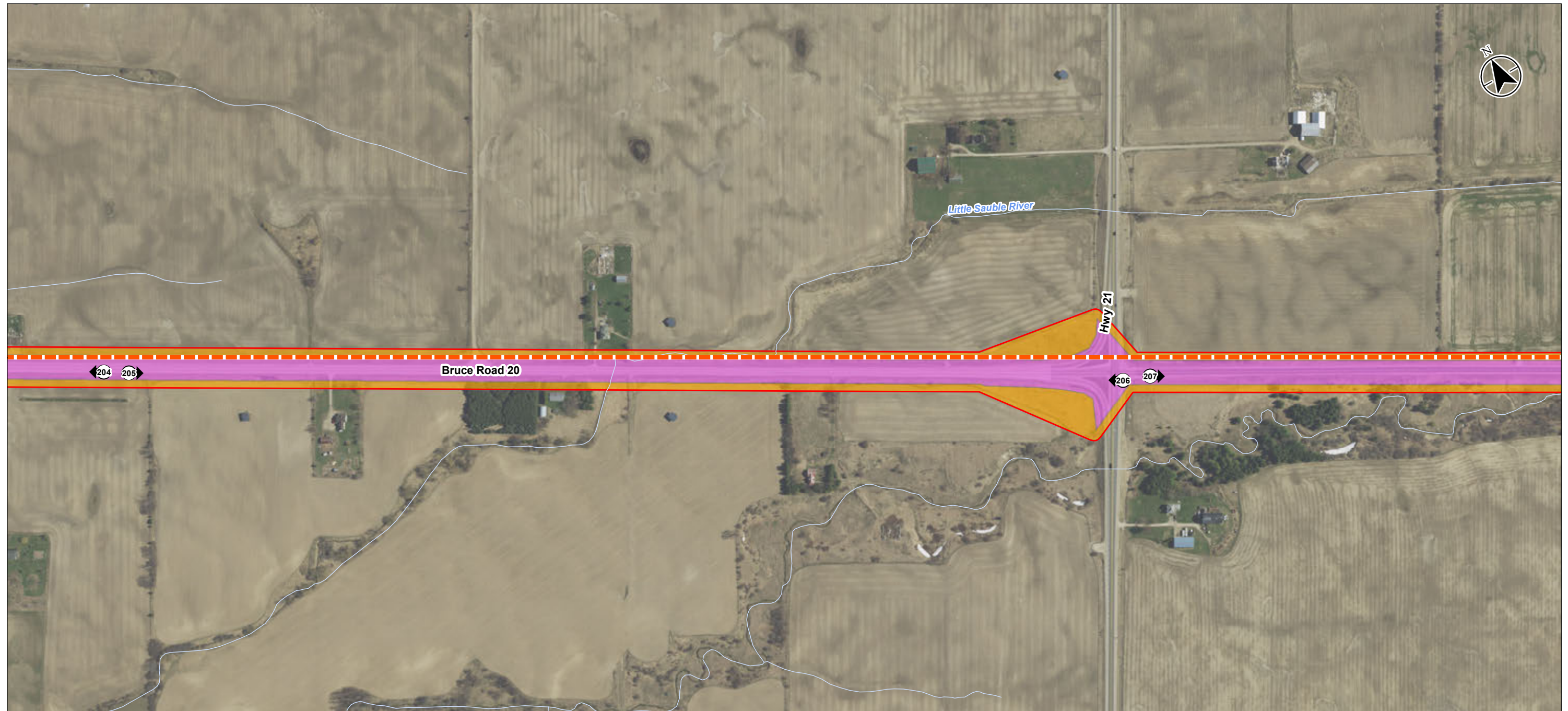


Project Location: Counties Of Bruce, Grey and Huron
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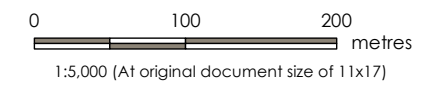
Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-43**

Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Expressway / Highway
 - Major Road
 - Watercourse



Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-44**

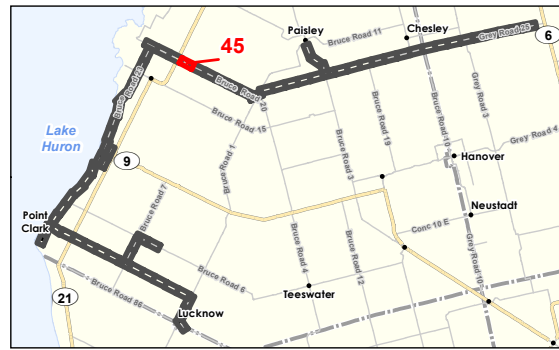
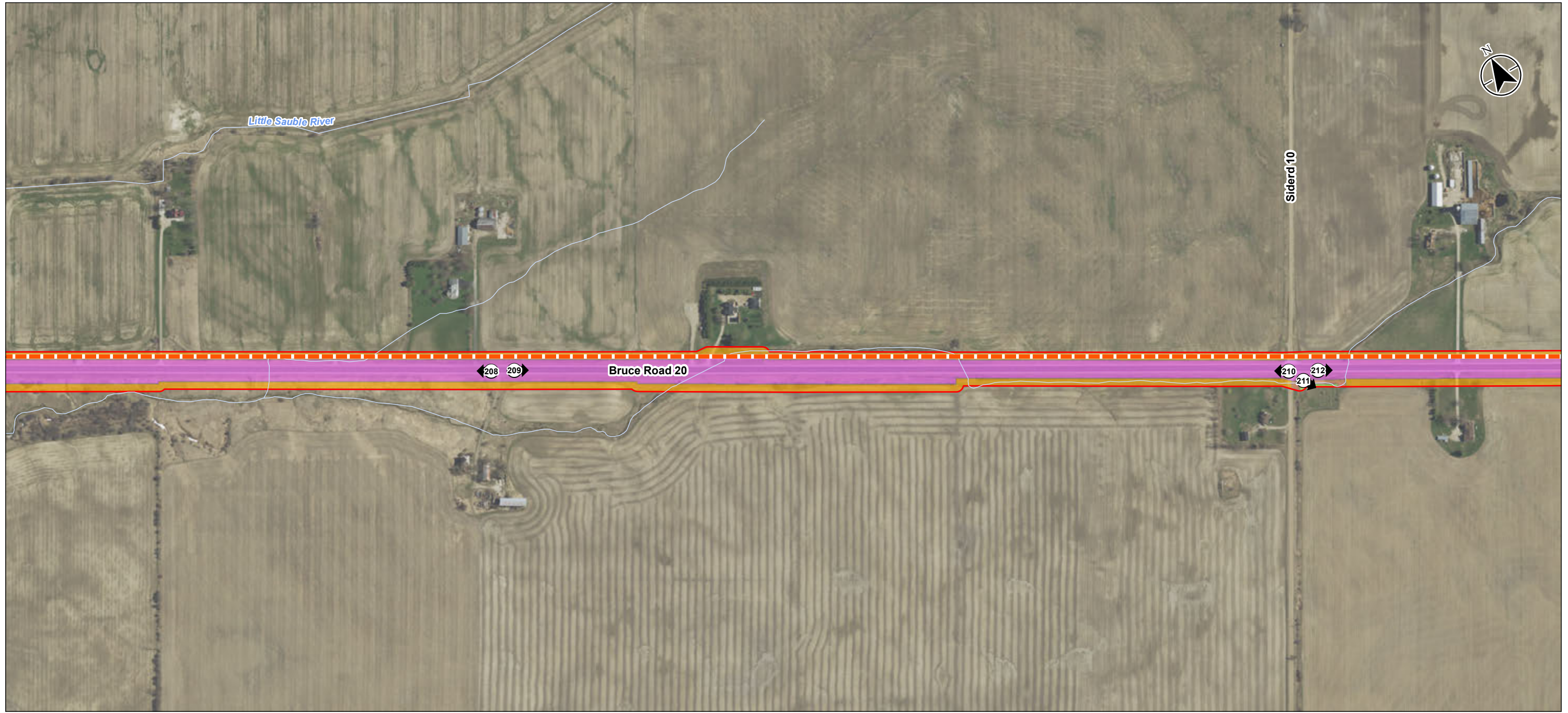
Title: **Results Index – Stage 1 Property Inspection Results**

Notes

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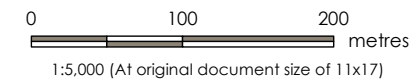
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- Legend**
- ▬▬▬ Preliminary Preferred Route
 - Study Area
 - Cemetery (Requires Avoidance)
 - Requires Stage 3 Cemetery Investigation
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse

Notes

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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

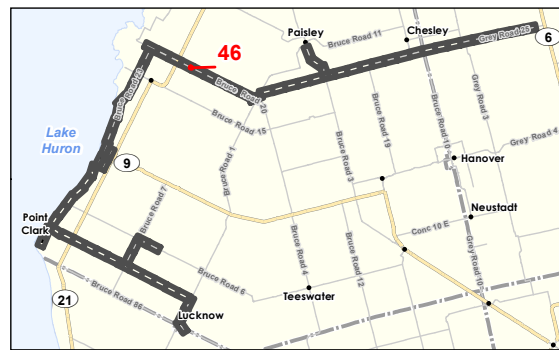
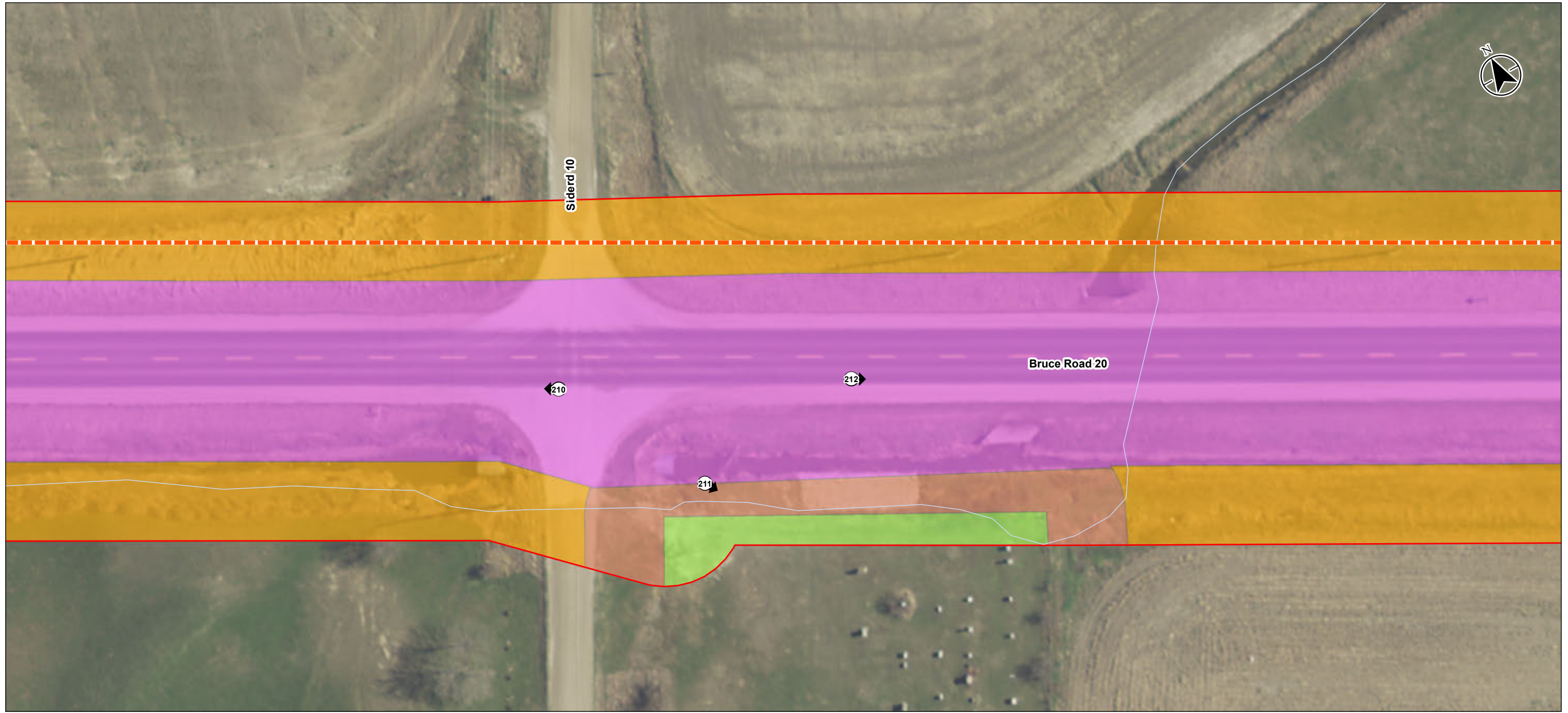
Figure No.

5-45

Title

Results Index – Stage 1 Property Inspection Results

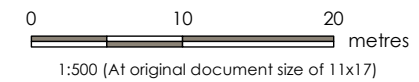
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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - Cemetery (Requires Avoidance)
 - Requires Stage 3 Cemetery Investigation
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse

Notes

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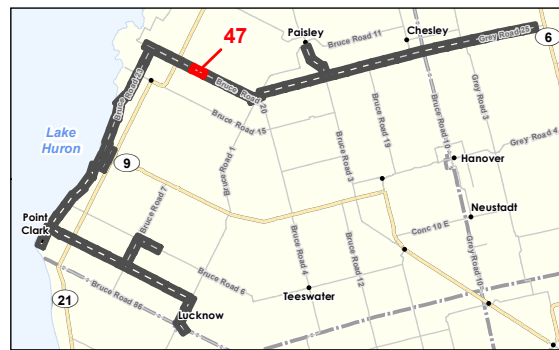
Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13
 160950831 REVA

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

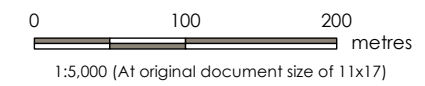
Figure No. **5-46**

Title: **Results Index – Stage 1 Property Inspection Results**

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- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse



Project Location: Counties Of Bruce, Grey and Huron
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-47**

Title: **Results Index – Stage 1 Property Inspection Results**

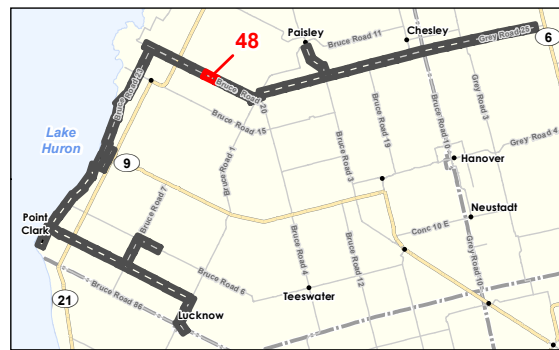
- Notes**
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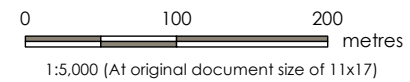
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- Legend**
- — — Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road



Project Location: Counties Of Bruce, Grey and Huron
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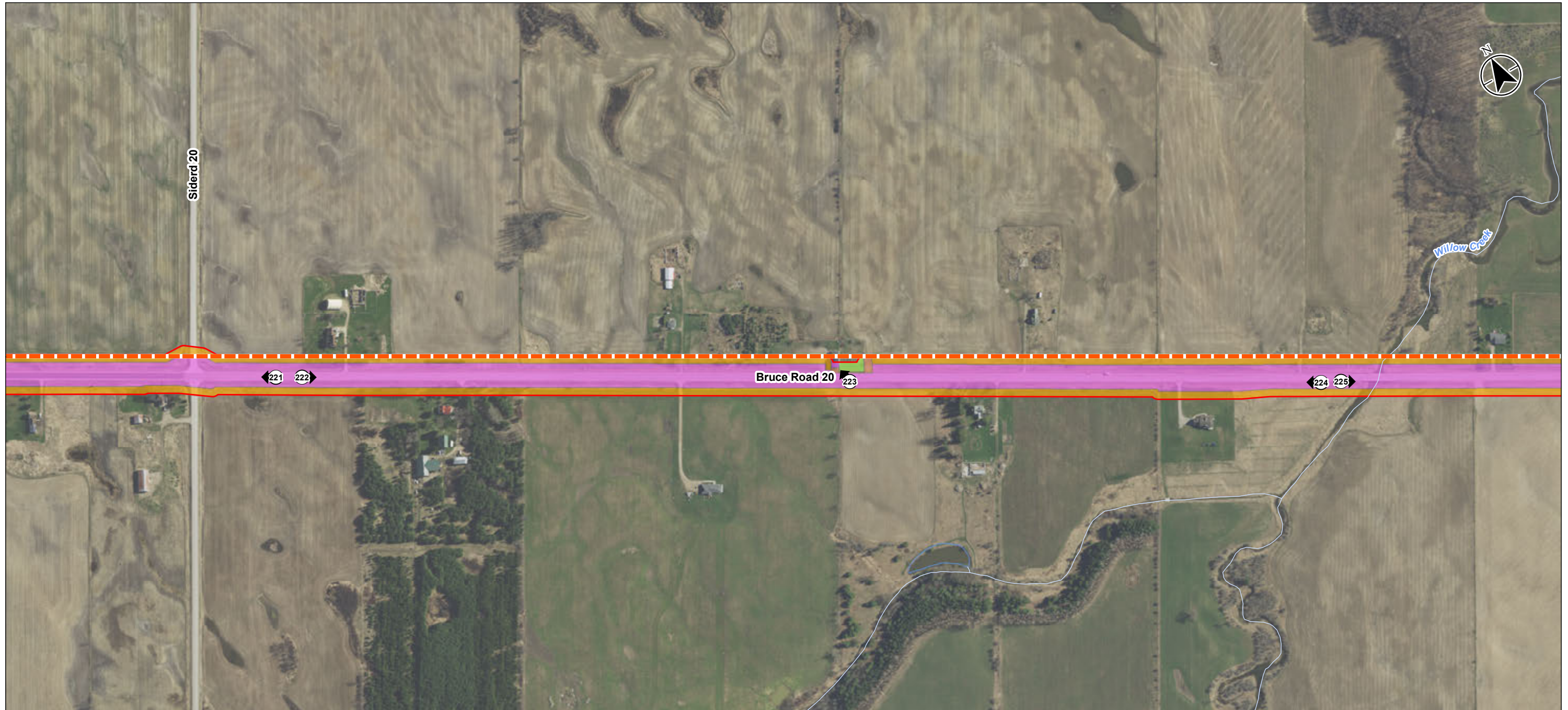
Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.
5-48

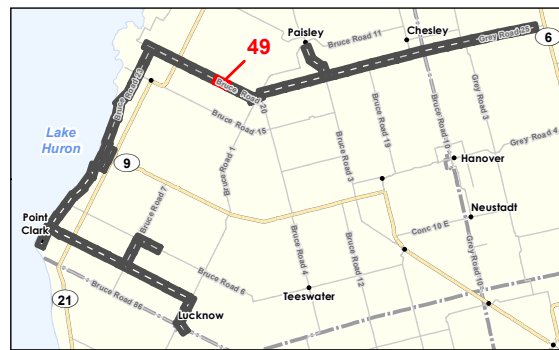
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Results Index – Stage 1 Property Inspection Results

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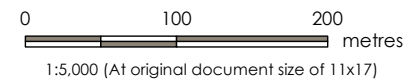
\\cd1215-01\work_group\01_60950831\Planning\Drawing\Archaeology\Stage 1\Fig05_Results_Stage1_Mapbook.mxd Reviewed: 2018-12-17 By: scd



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - Cemetery (Requires Avoidance)
 - Requires Stage 3 Cemetery Investigation
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
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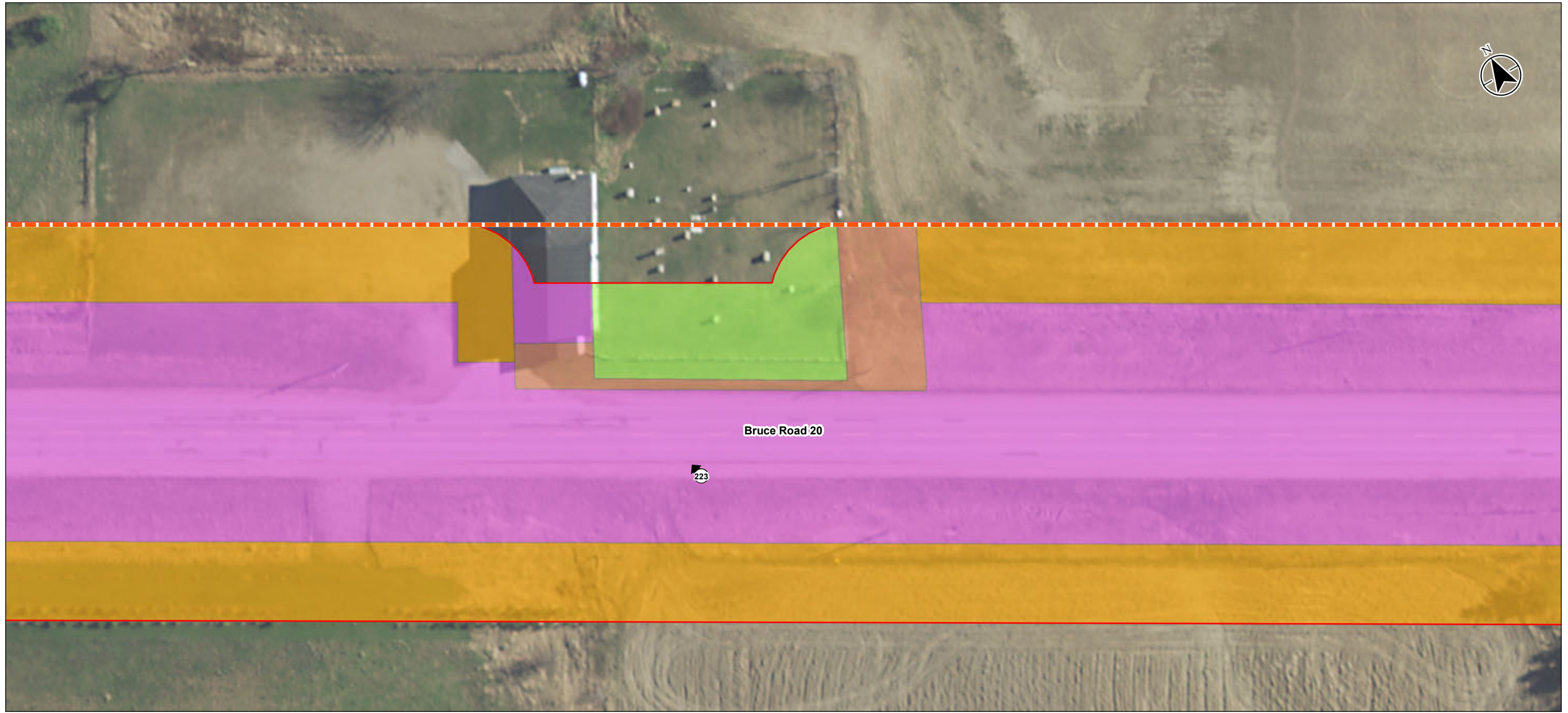
Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.

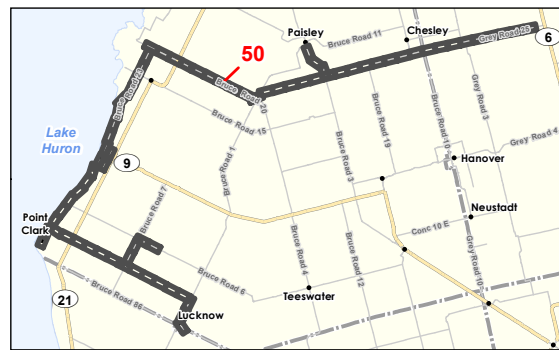
5-49

Title

Results Index – Stage 1 Property Inspection Results



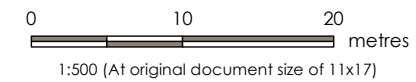
Bruce Road 20



Legend

- — — Preliminary Preferred Route
- Study Area
- Cemetery (Requires Avoidance)
- Requires Stage 3 Cemetery Investigation
- No Potential (Disturbed)
- Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
- Major Road

Notes
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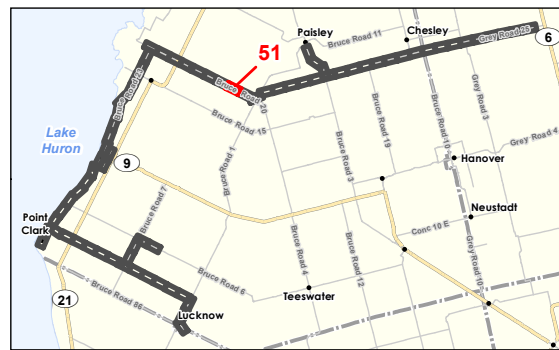
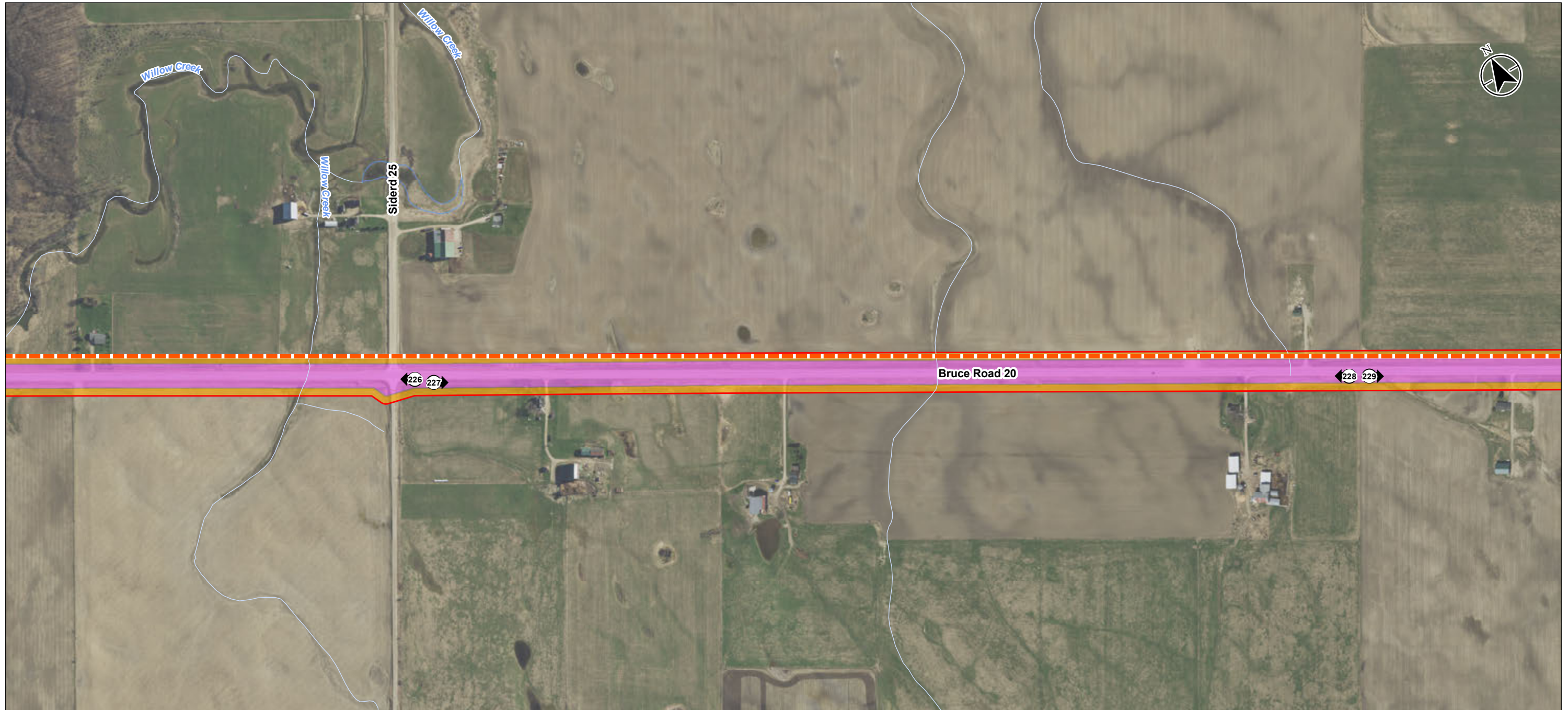


Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-50**

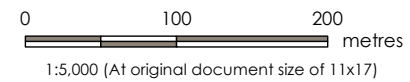
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- — — — — Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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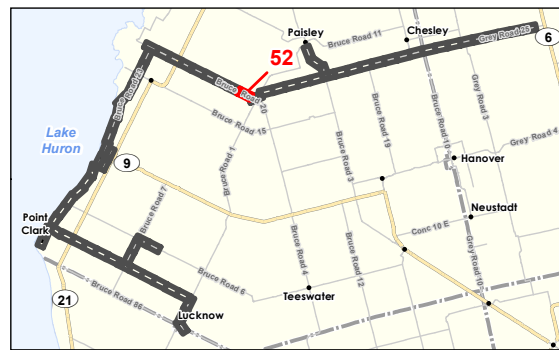
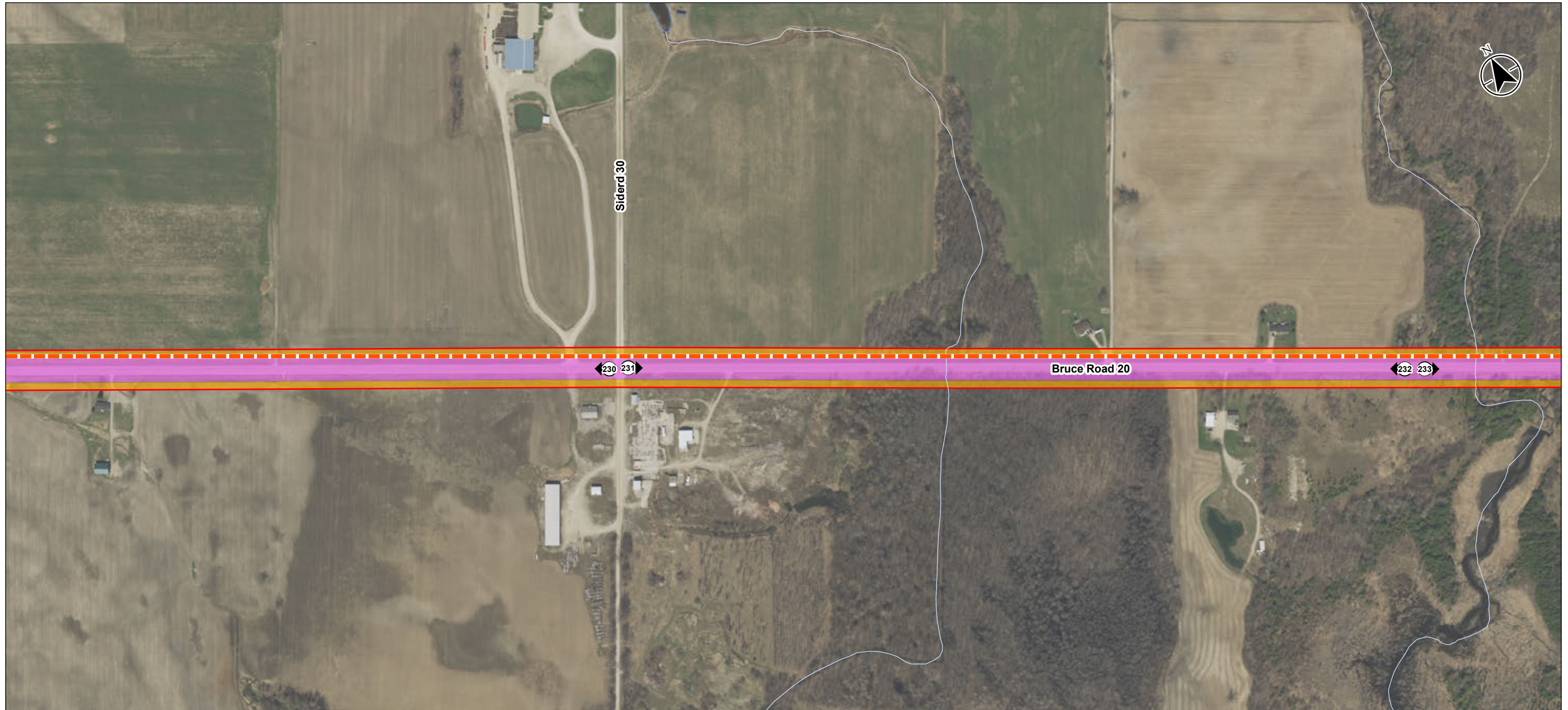
Project Location: Counties Of Bruce, Grey and Huron
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

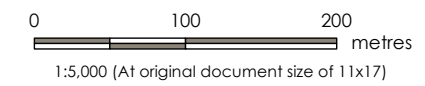
Figure No. **5-51**

Title: **Results Index – Stage 1 Property Inspection Results**

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- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody



Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-52**

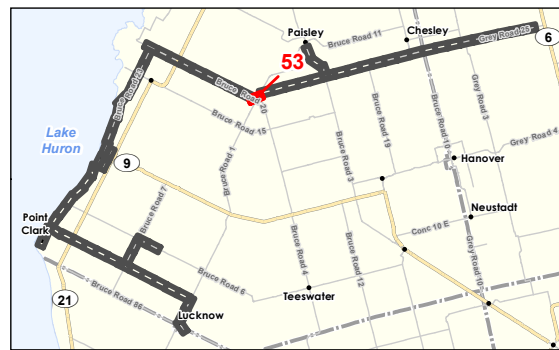
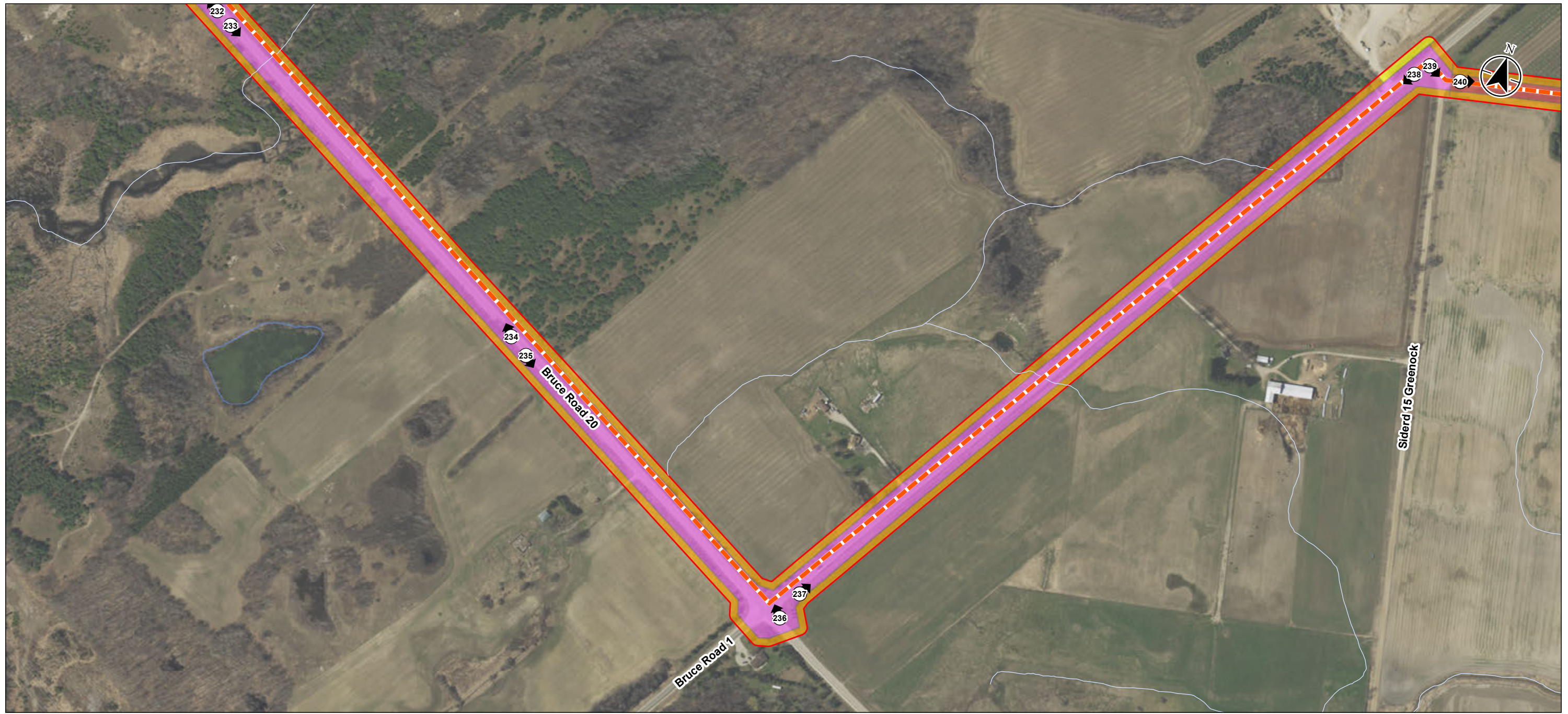
Title: **Results Index – Stage 1 Property Inspection Results**

Notes

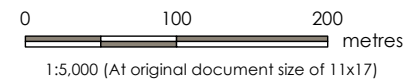
1. Coordinate System: NAD 1983 UTM Zone 17N
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- Legend**
- Preliminary Preferred Route
 - Study Area
 - Potential for near-surface capped topsoil (Requires Stage 2 Test-pit survey at a 5m interval within ROW)
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Previously Assessed (DRPA 2012a)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody



Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13
 160950831 REVA

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

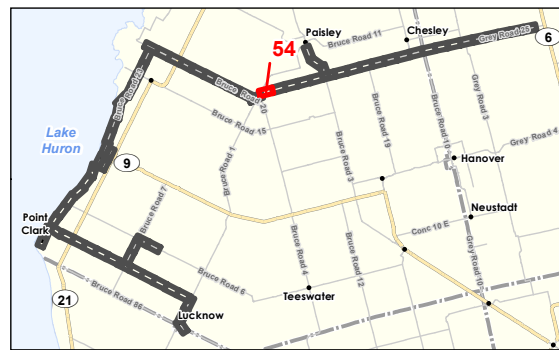
Figure No. **5-53**

Title: **Results Index – Stage 1 Property Inspection Results**

Notes
 1. Coordinate System: NAD 1983 UTM Zone 17N
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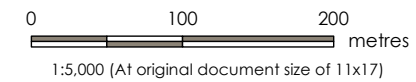
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Legend

- Preliminary Preferred Route
- Study Area
- Potential for near-surface capped topsoil (Requires Stage 2 Test-pit survey at a 5m interval within ROW)
- No Potential (Disturbed)
- Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
- Previously Assessed (DRPA 2012a)
- Major Road
- Minor Road
- Watercourse
- Waterbody

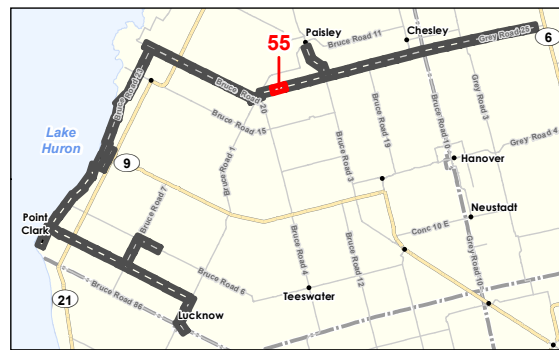


Project Location: Counties Of Bruce, Grey and Huron
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-54**

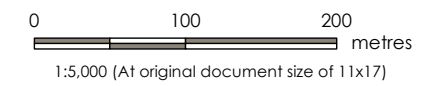
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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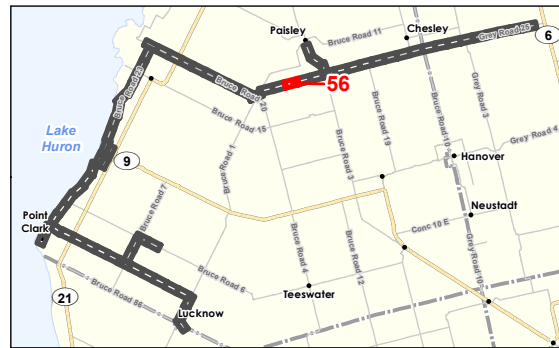
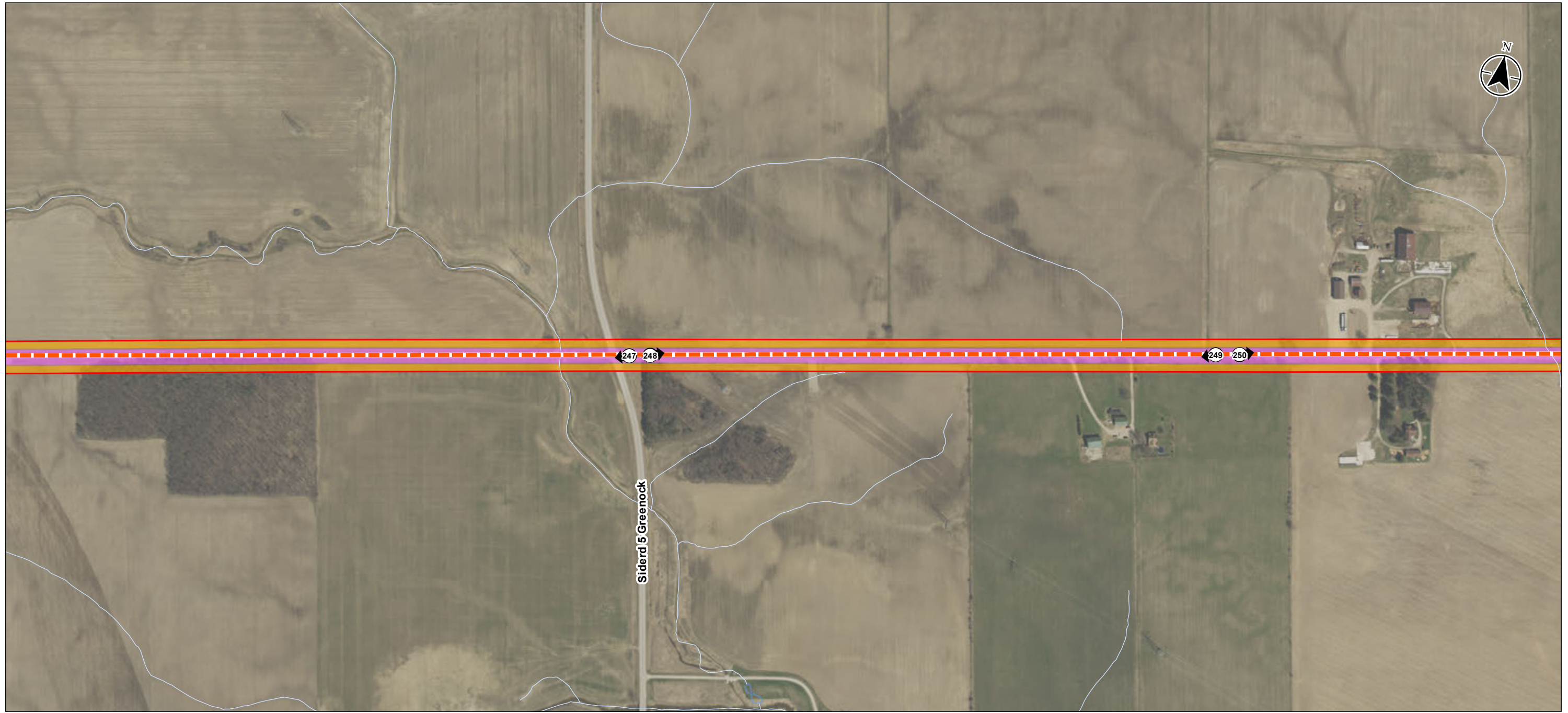


Project Location: Counties Of Bruce, Grey and Huron
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-55**

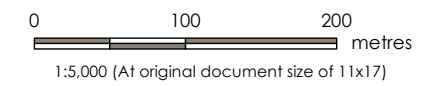
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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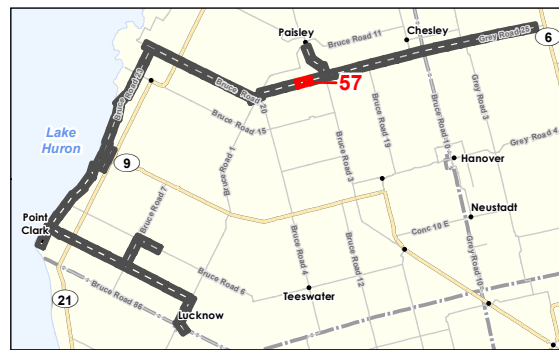
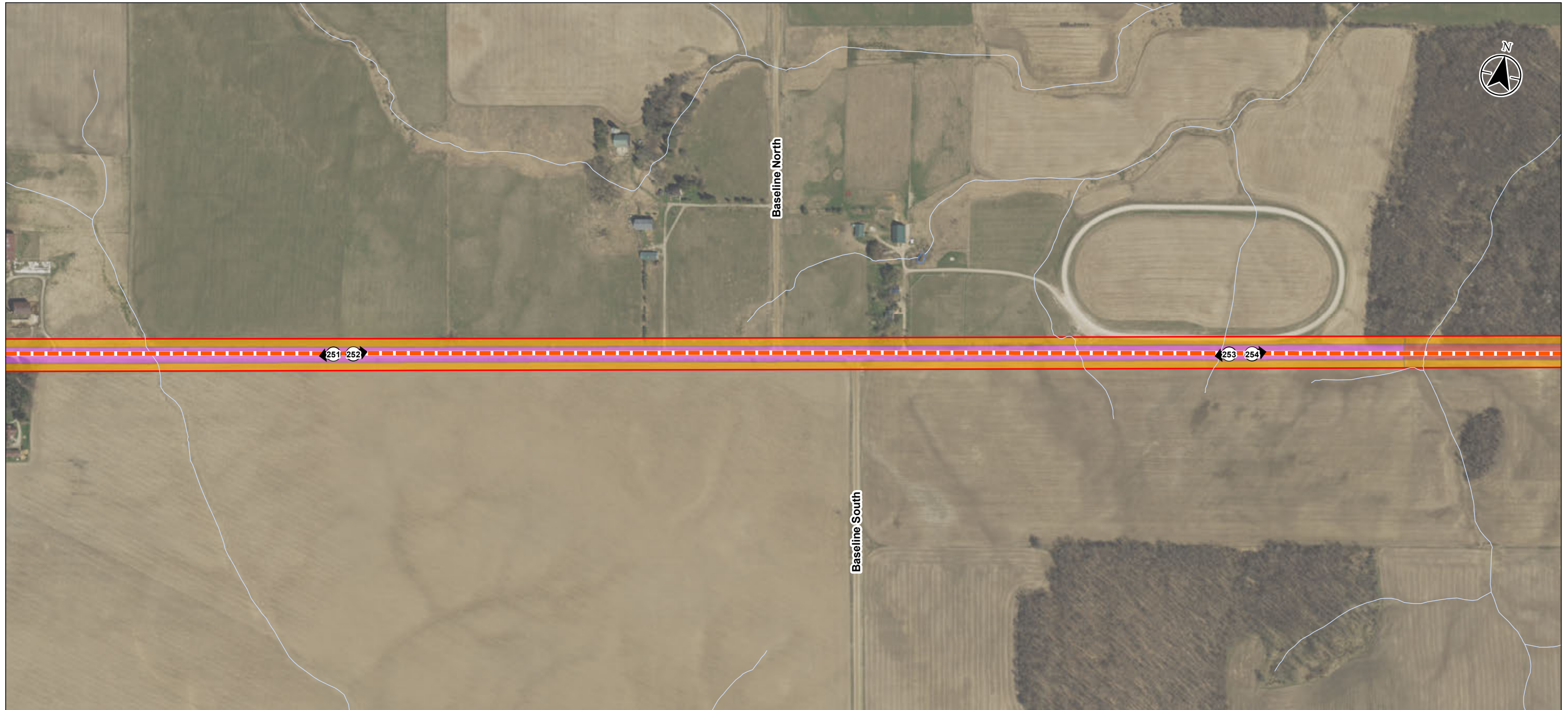


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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-56**

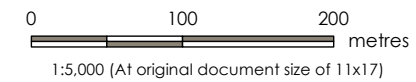
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- — — Preliminary Preferred Route
 - Study Area
 - Potential for near-surface capped topsoil (Requires Stage 2 Test-pit survey at a 5m interval within ROW)
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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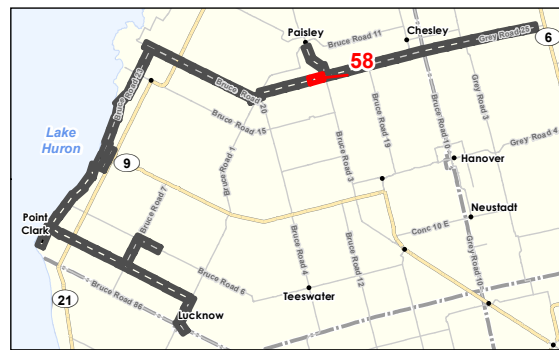
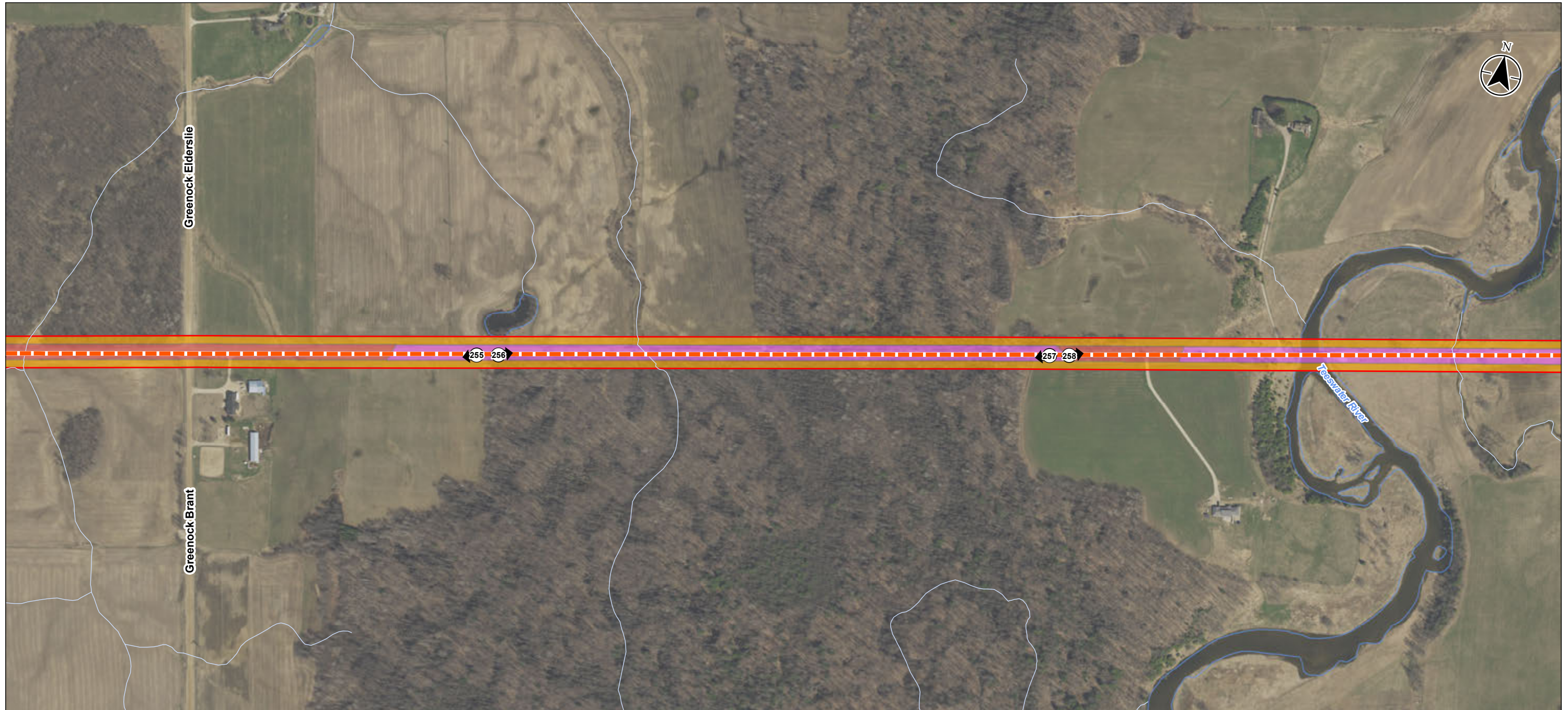


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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-57**

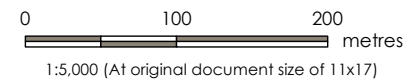
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - Potential for near-surface capped topsoil (Requires Stage 2 Test-pit survey at a 5m interval within ROW)
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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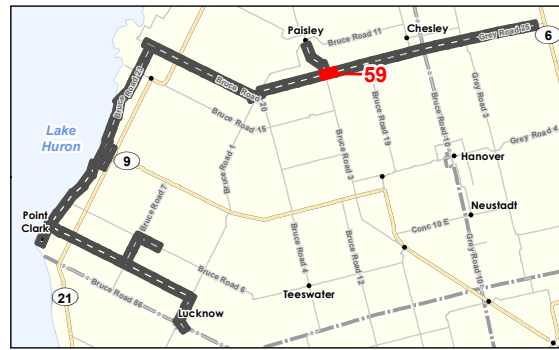
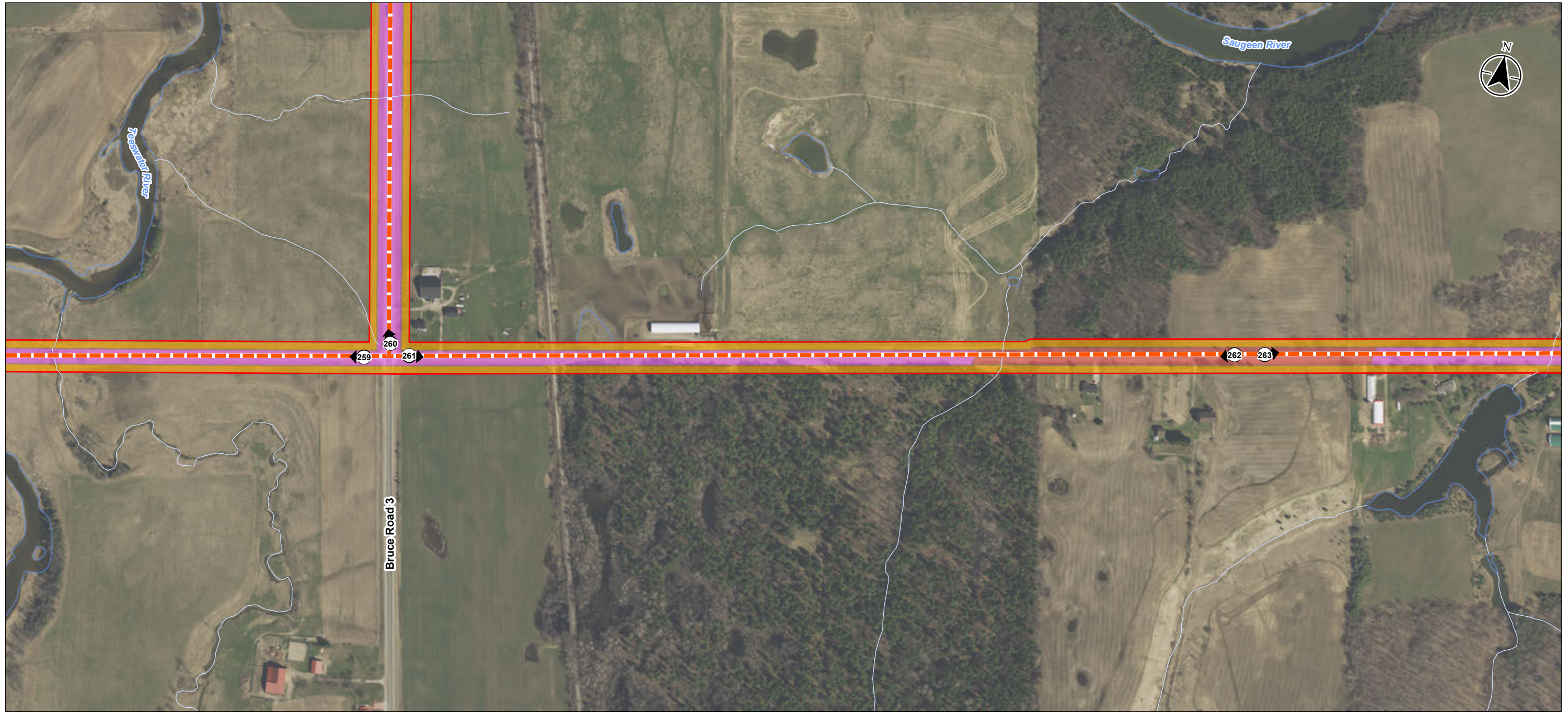


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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-58**

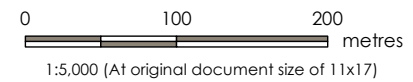
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- Preliminary Preferred Route
 - Study Area
 - Potential for near-surface capped topsoil (Requires Stage 2 Test-pit survey at a 5m interval within ROW)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - No Potential (Disturbed)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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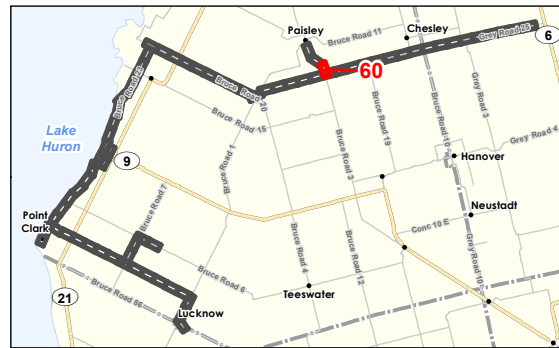
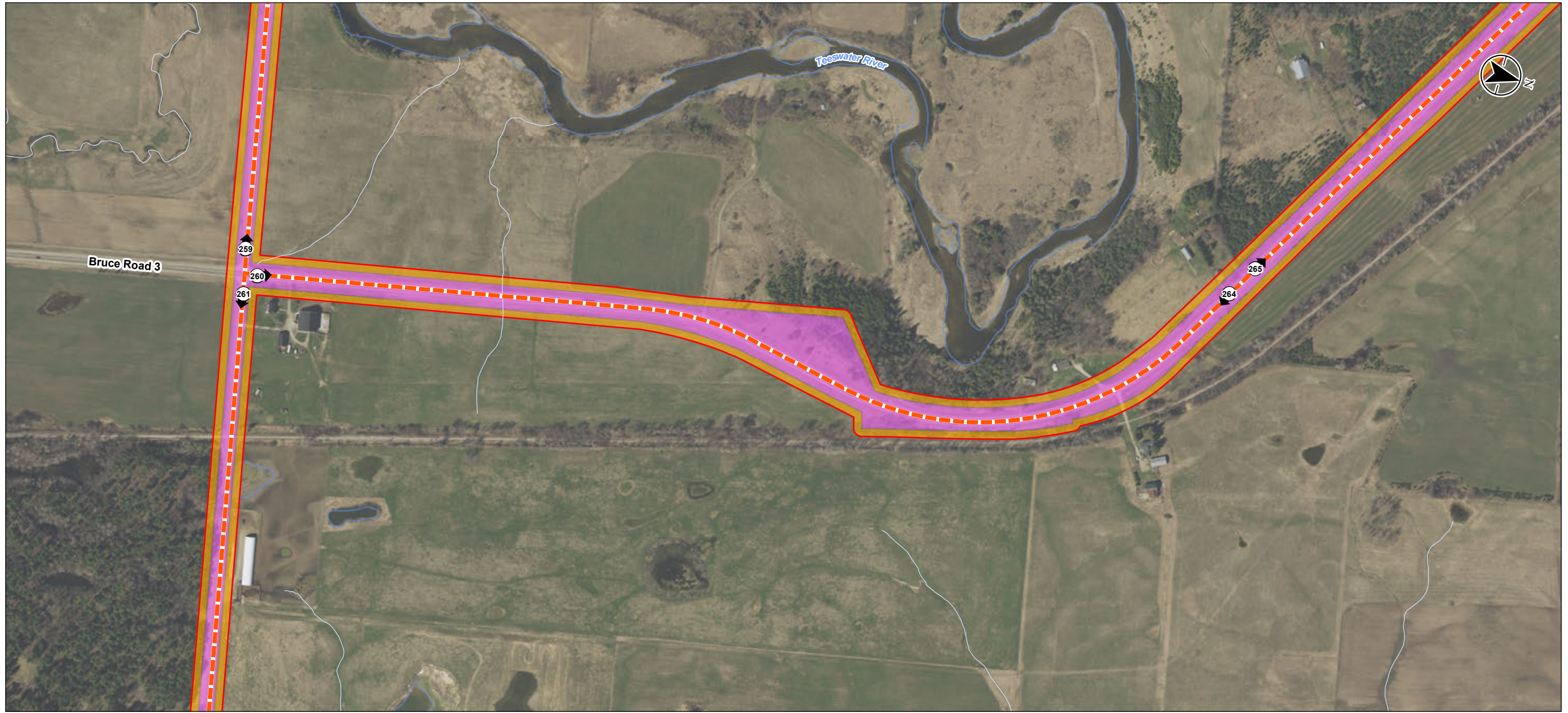


Project Location: Counties Of Bruce, Grey and Huron
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-59**

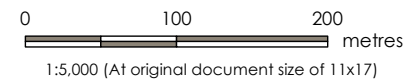
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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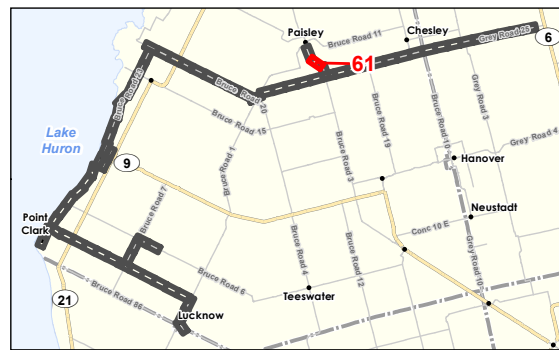
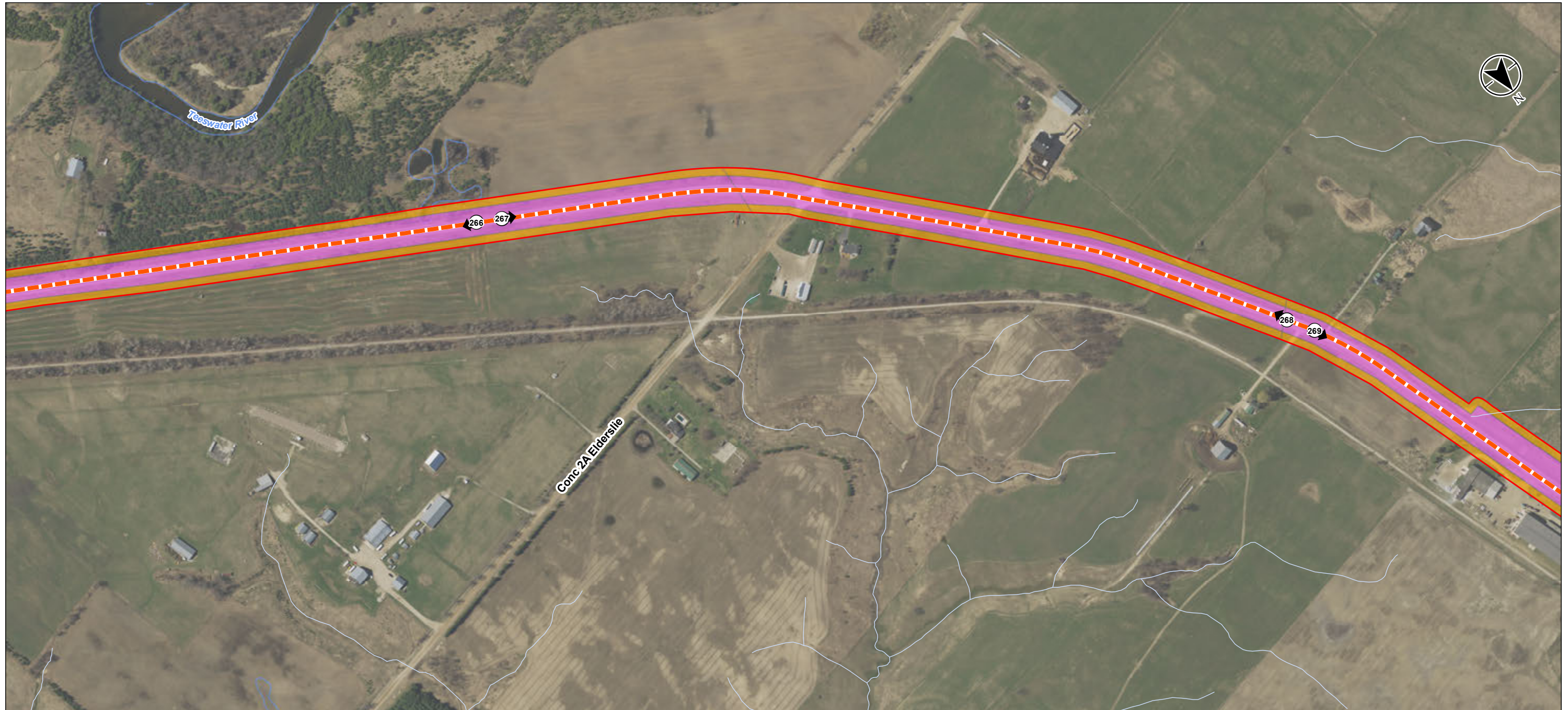


Project Location: Counties Of Bruce, Grey and Huron
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 Technical Review by BCC on 2018-06-13
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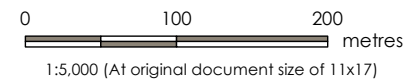
Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-60**

Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody



Project Location: Counties Of Bruce, Grey and Huron
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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

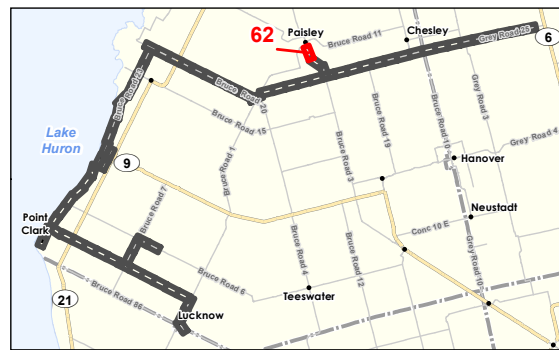
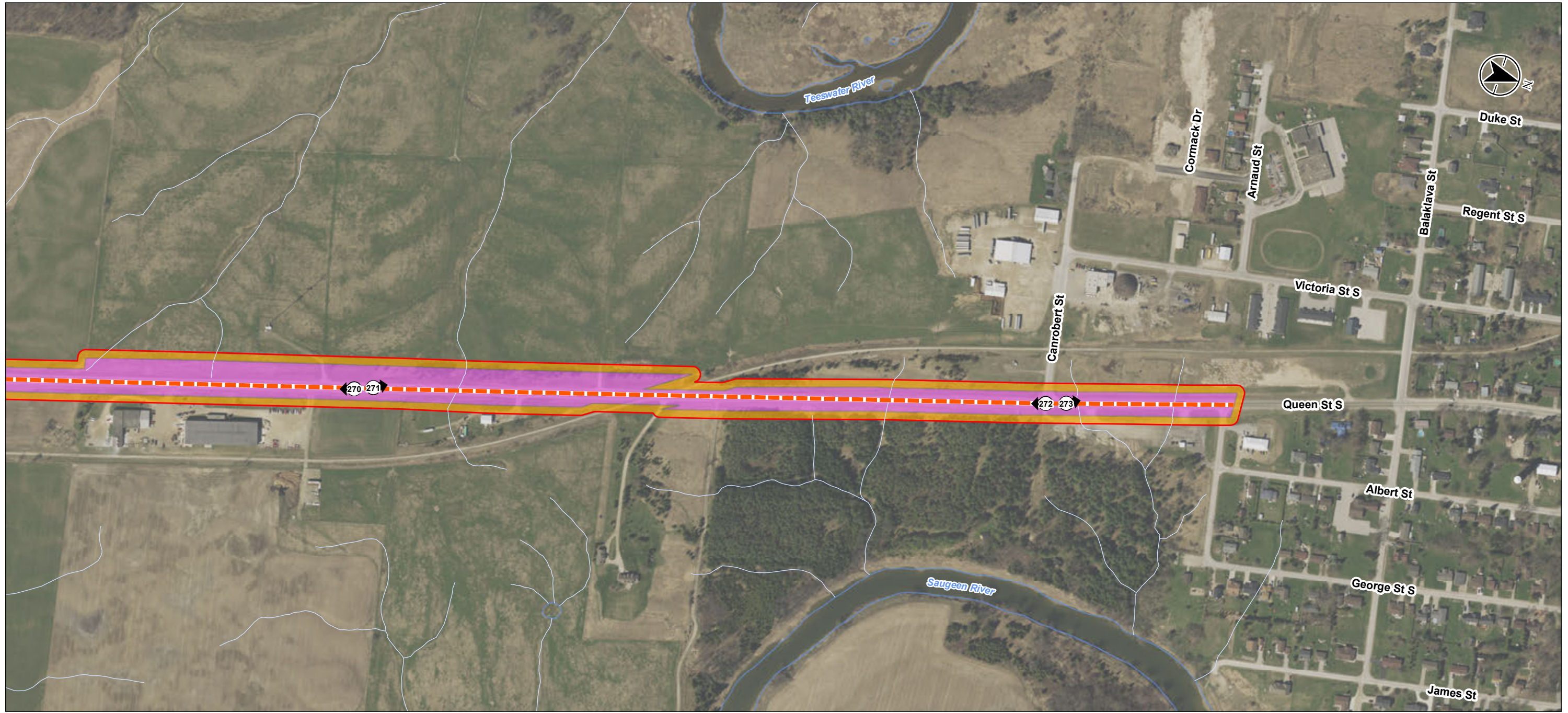
Figure No. **5-61**

Title: **Results Index – Stage 1 Property Inspection Results**

- Notes**
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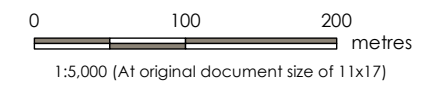
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- Legend**
- — — Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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3. Orthoimagery © MNRF, 2015. Imagery Date, 2015.

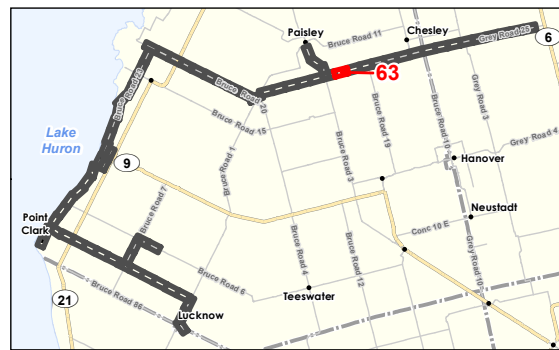
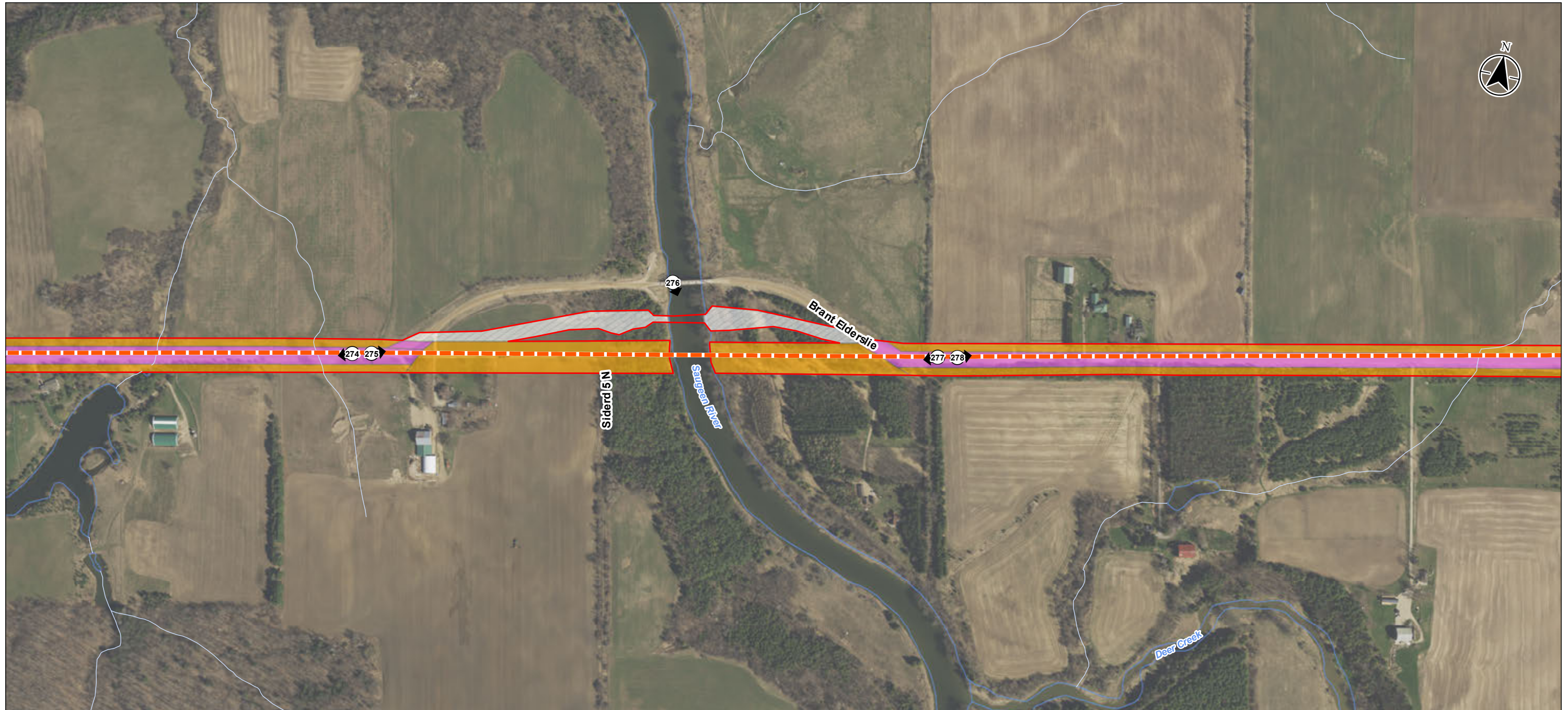


Project Location: Counties Of Bruce, Grey and Huron
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-62**

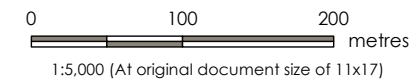
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Previously Assessed (Amec Foster Wheeler 2017)
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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3. Orthoimagery © MNRF, 2015. Imagery Date, 2015.



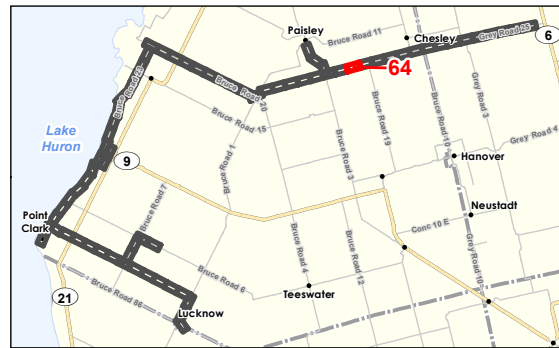
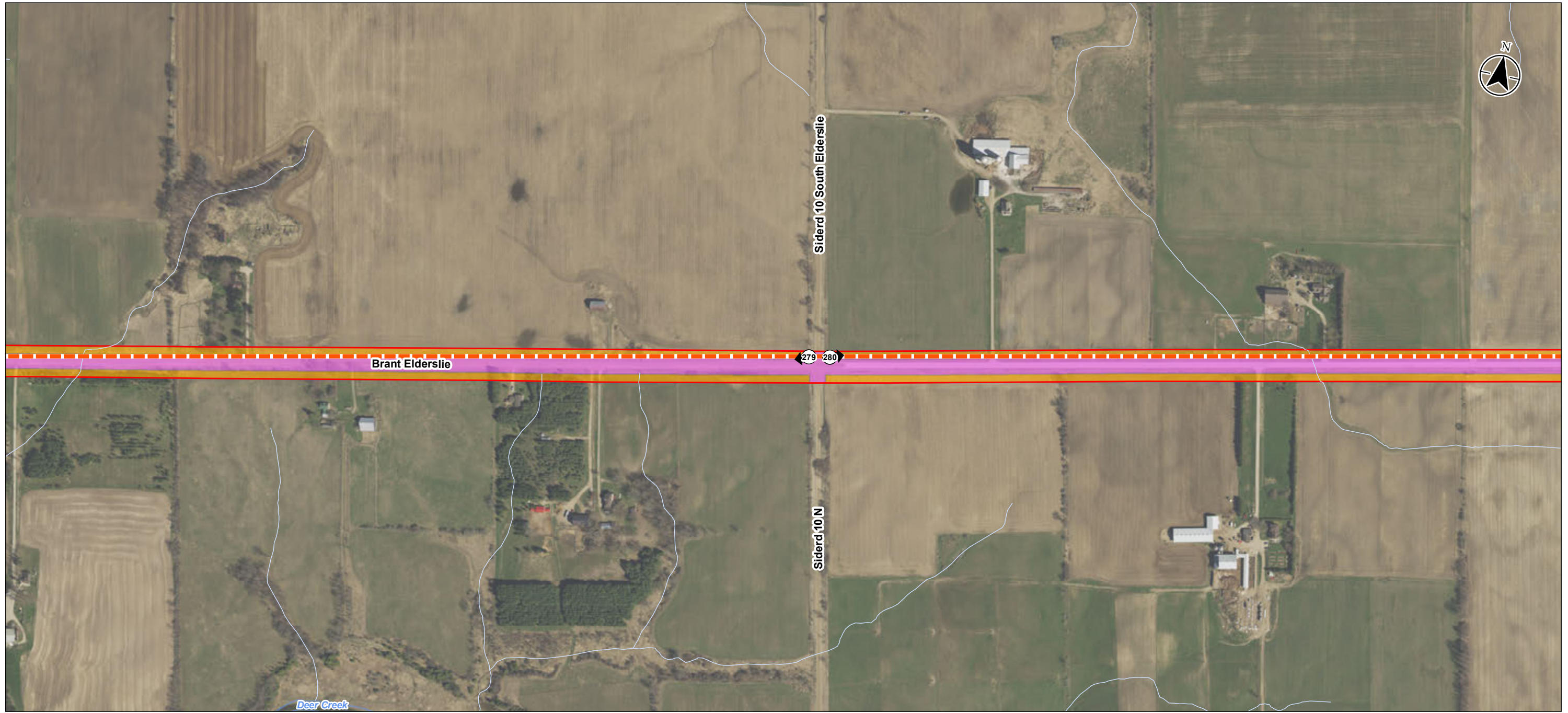
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 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-63**

Title: **Results Index – Stage 1 Property Inspection Results**

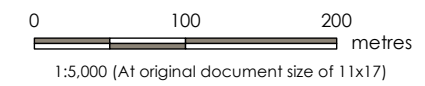
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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse
 - Waterbody

Notes

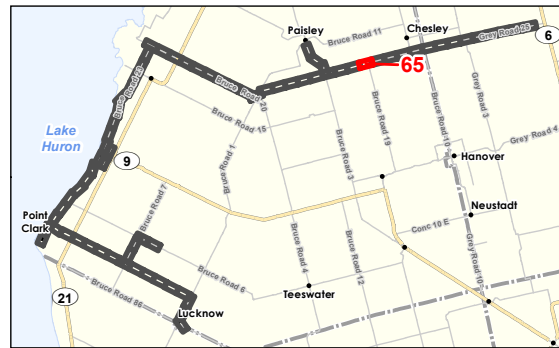
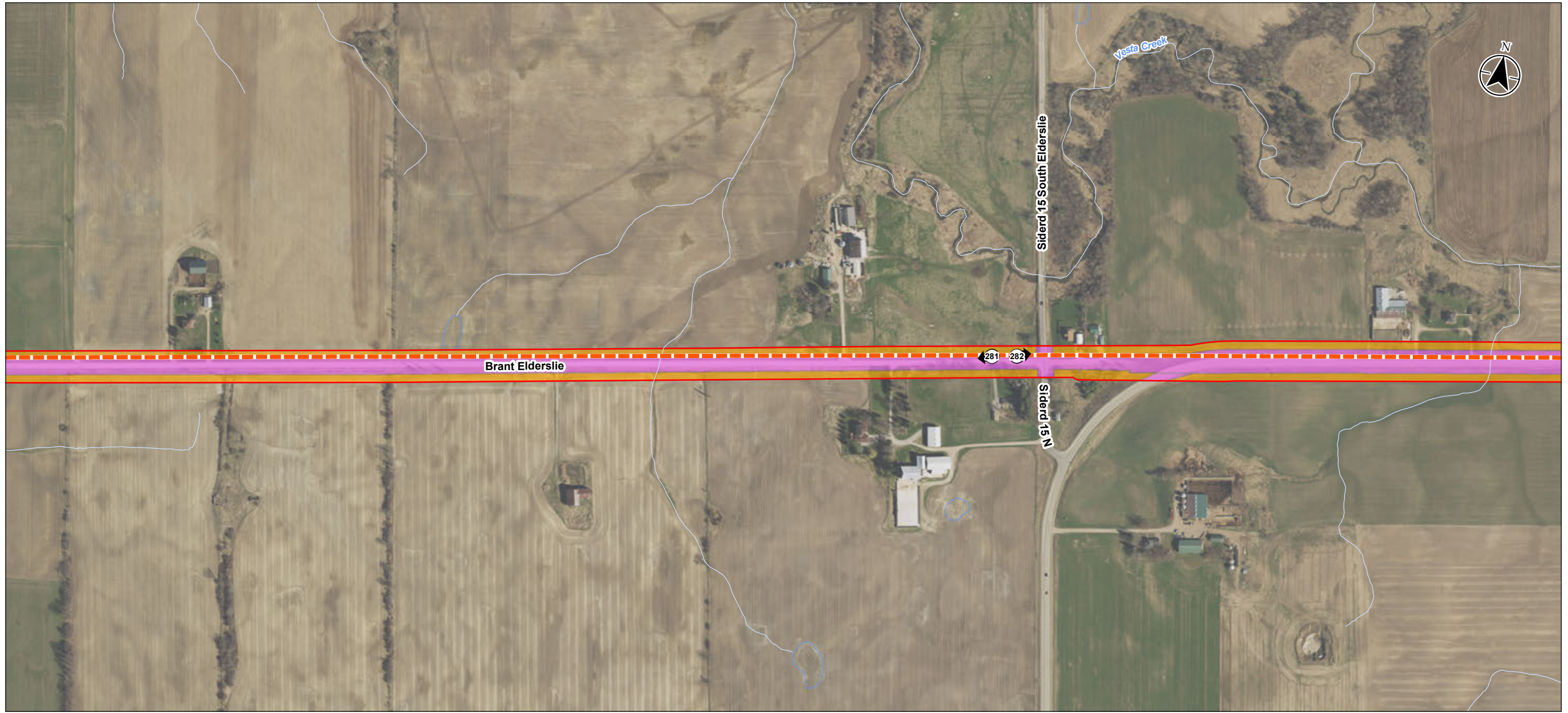
1. Coordinate System: NAD 1983 UTM Zone 17N
2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © Queen's Printer for Ontario, 2018.
3. Orthoimagery © MNRF, 2015. Imagery Date, 2015.



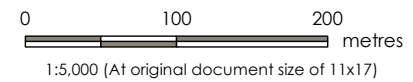
Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-64**
 Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody



Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

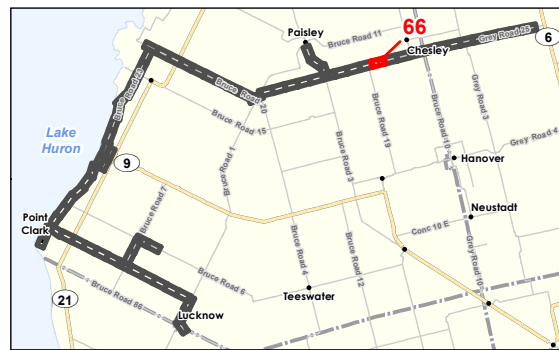
Figure No. **5-65**

Title: **Results Index – Stage 1 Property Inspection Results**

- Notes**
1. Coordinate System: NAD 1983 UTM Zone 17N
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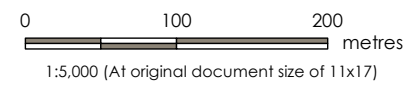
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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse

Notes

1. Coordinate System: NAD 1983 UTM Zone 17N
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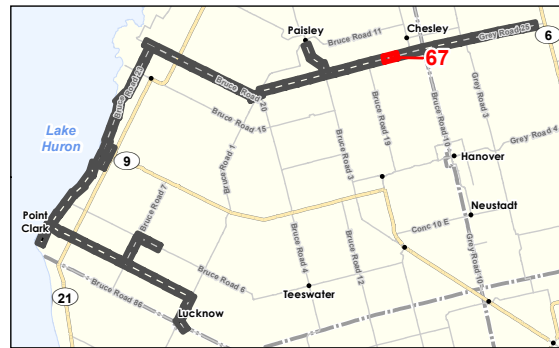
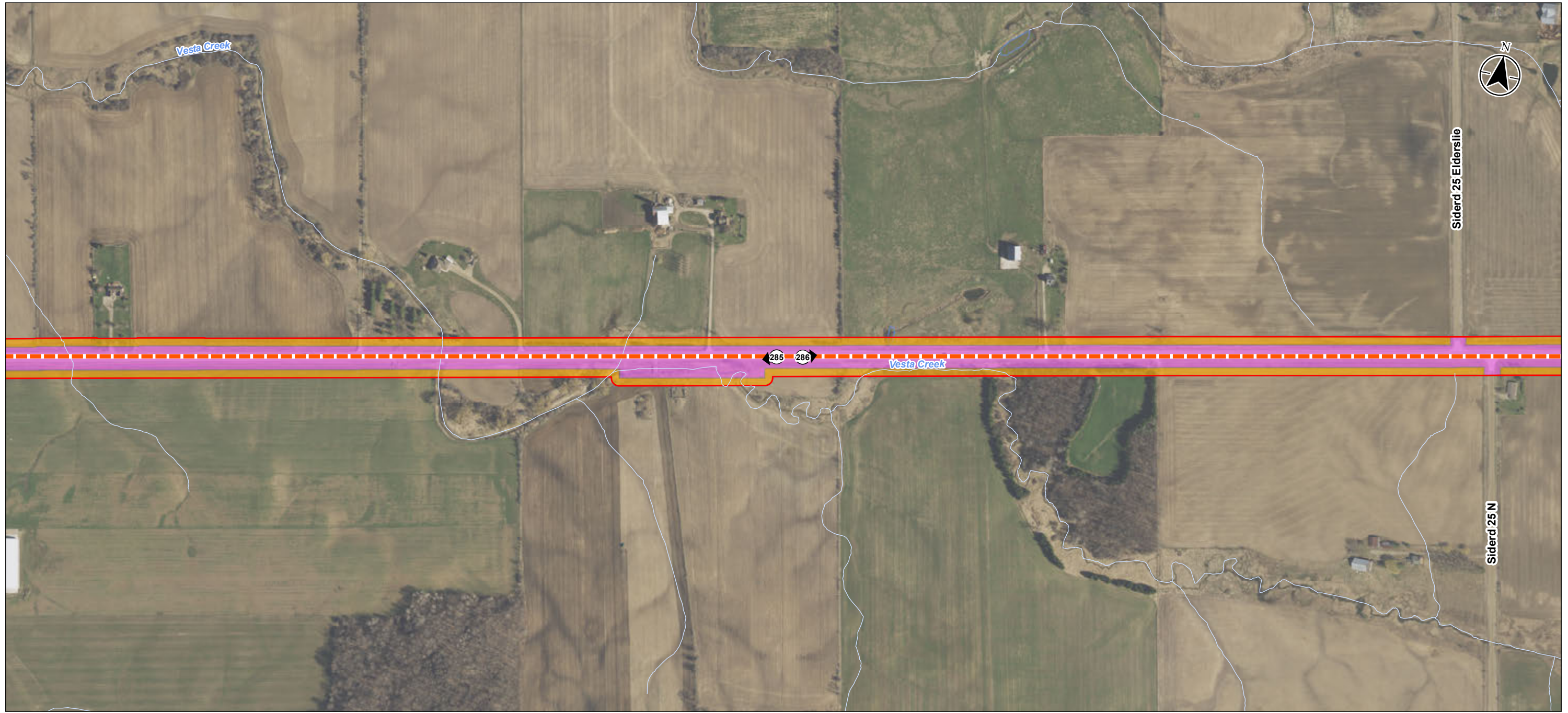
Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-66**

Title: **Results Index – Stage 1 Property Inspection Results**

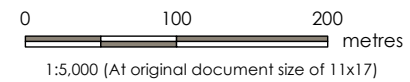
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- Legend**
- — — Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

1. Coordinate System: NAD 1983 UTM Zone 17N
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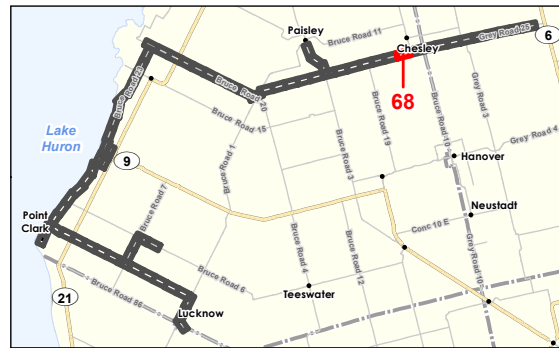
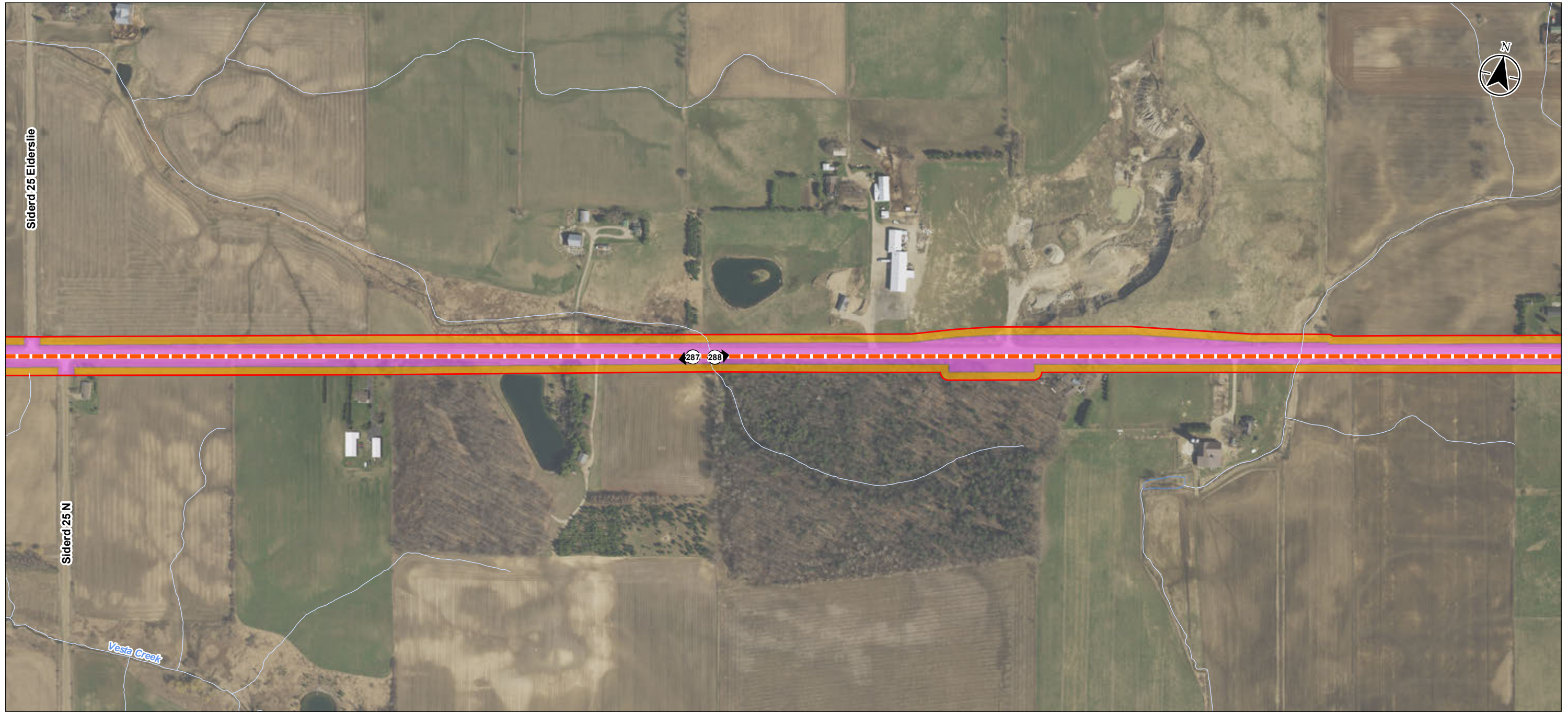


Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13
 160950831 REVA

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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-67**

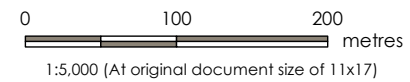
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

1. Coordinate System: NAD 1983 UTM Zone 17N
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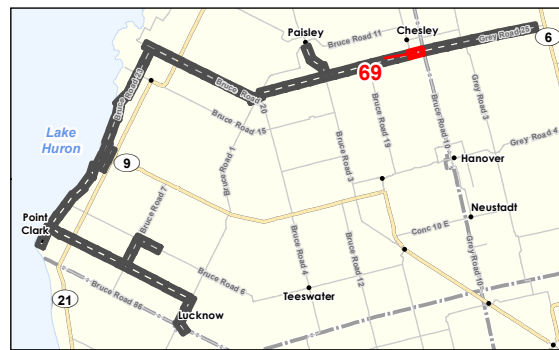
Project Location: Counties Of Bruce, Grey and Huron
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 Technical Review by BCC on 2018-06-13

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-68**

Title: **Results Index – Stage 1 Property Inspection Results**

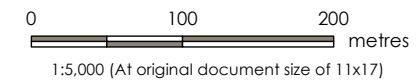
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- Legend**
- — — — — Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse

Notes

1. Coordinate System: NAD 1983 UTM Zone 17N
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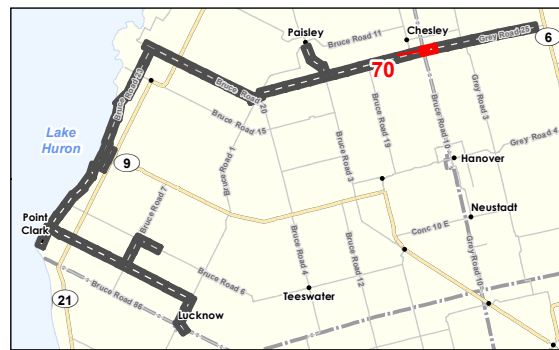
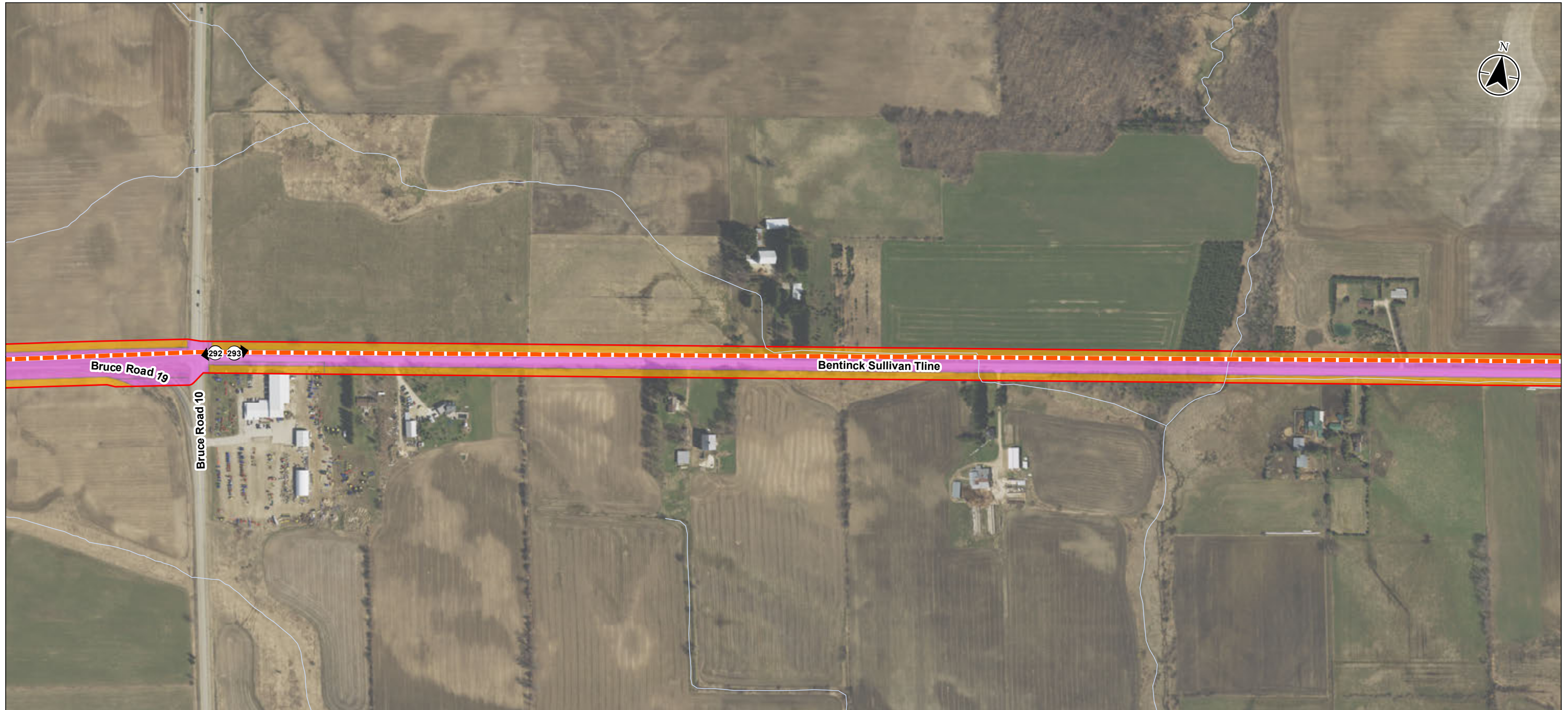


Project Location: Counties Of Bruce, Grey and Huron
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

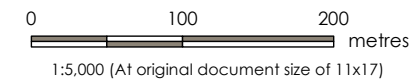
Figure No.: **5-69**

Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse

- Notes**
1. Coordinate System: NAD 1983 UTM Zone 17N
 2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © Queen's Printer for Ontario, 2018.
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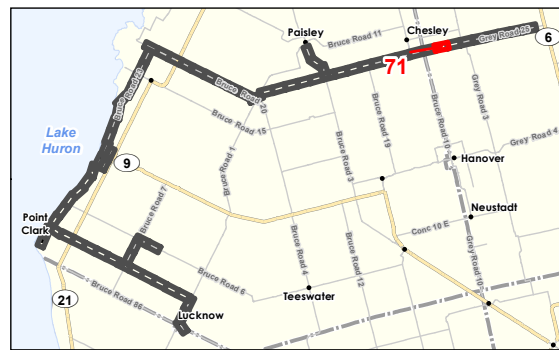
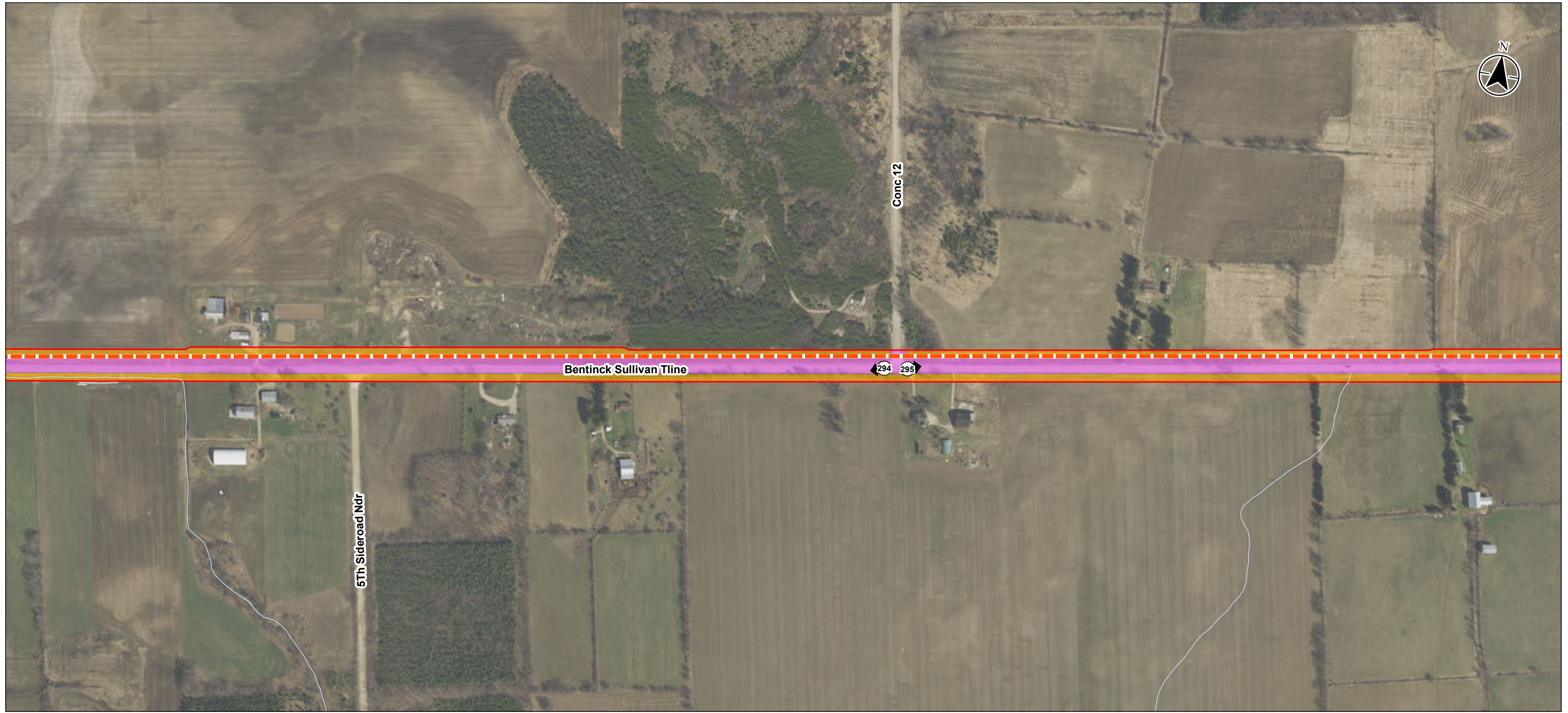
Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-70**

Title: **Results Index – Stage 1 Property Inspection Results**

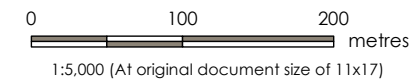
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- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse

Notes

1. Coordinate System: NAD 1983 UTM Zone 17N
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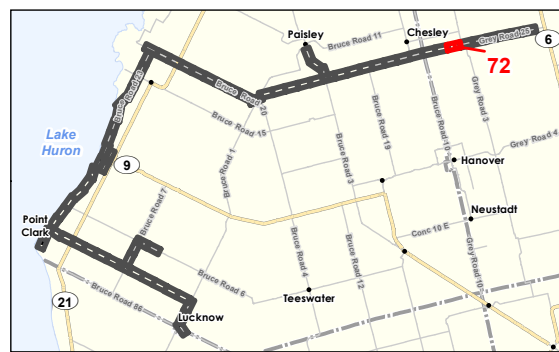
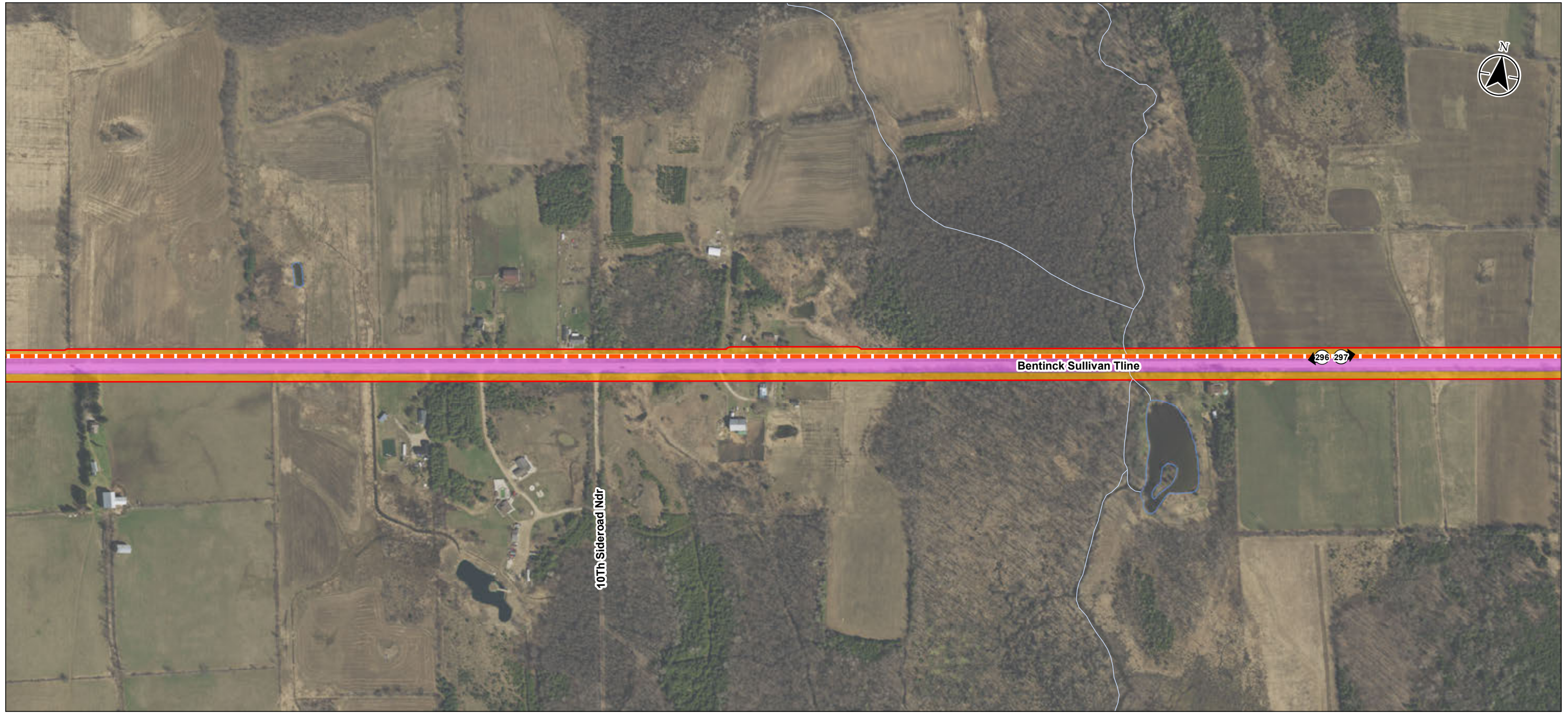


Project Location: Counties Of Bruce, Grey and Huron
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 Technical Review by BCC on 2018-06-13

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-71**

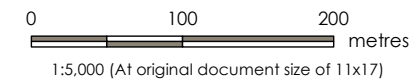
Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Minor Road
 - Watercourse
 - Waterbody

Notes

1. Coordinate System: NAD 1983 UTM Zone 17N
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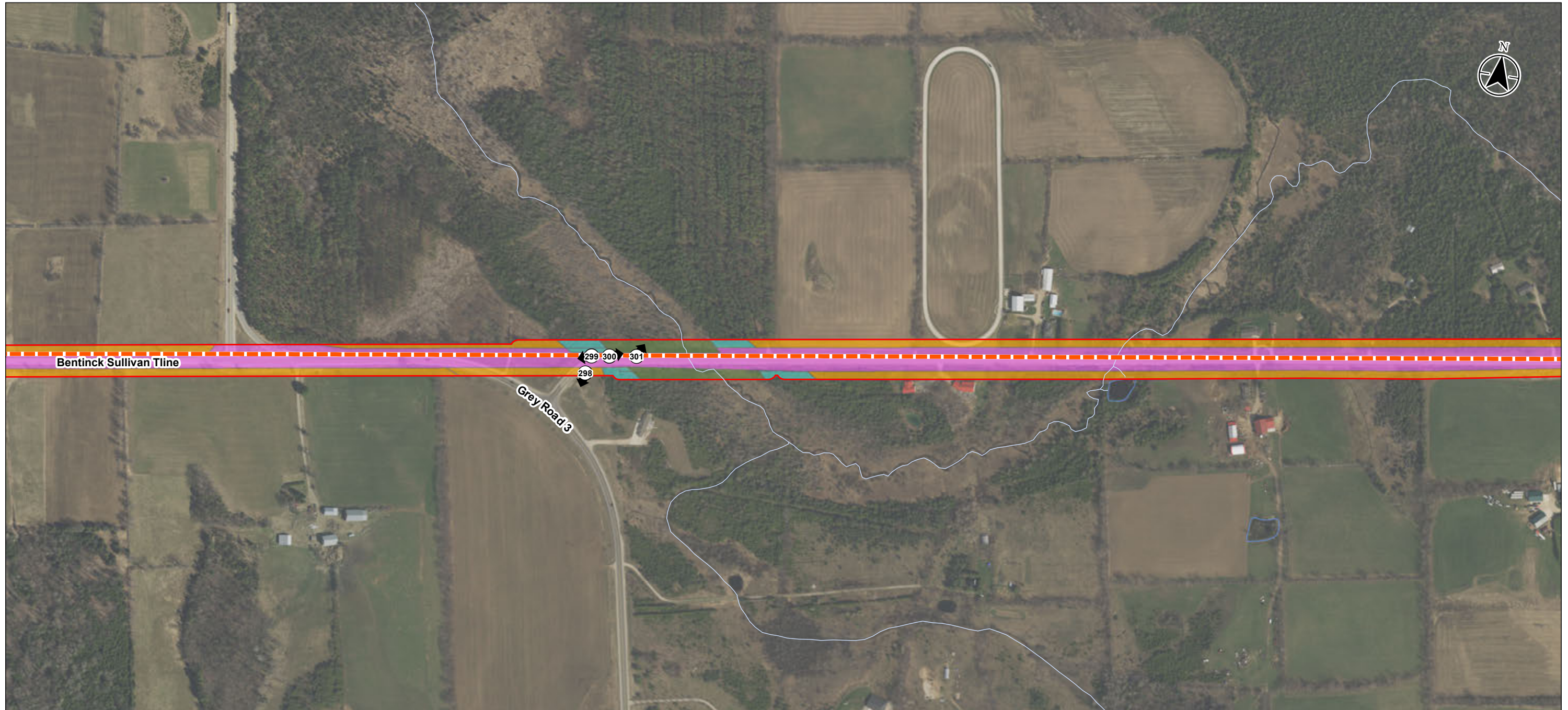
Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-72**

Title: **Results Index – Stage 1 Property Inspection Results**

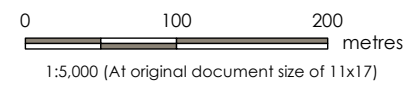
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- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Steeply Sloped)
 - No Potential (Disturbed)
 - No Potential - (Low and Wet)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

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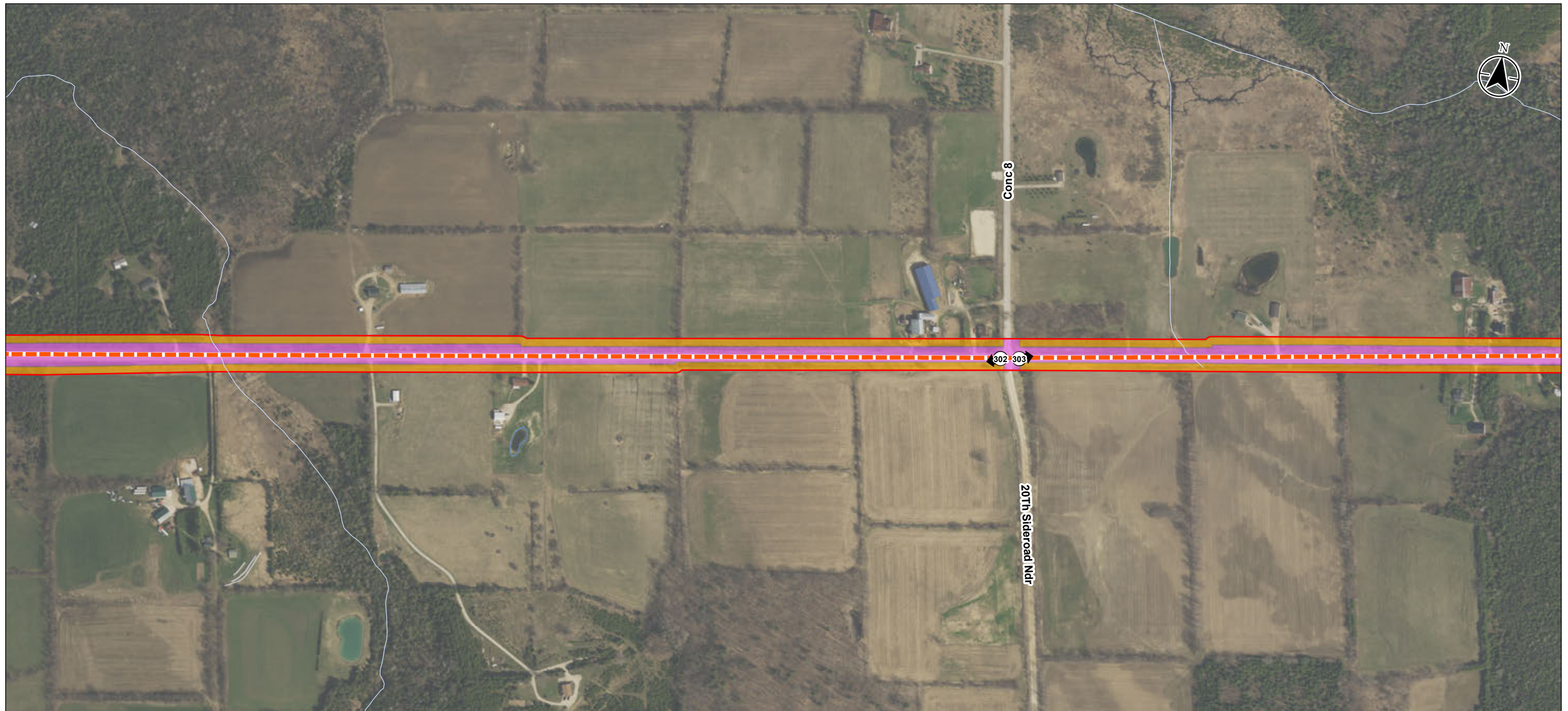


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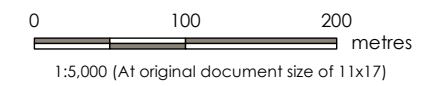
Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-73**

Title: **Results Index – Stage 1 Property Inspection Results**



- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody



Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-74**

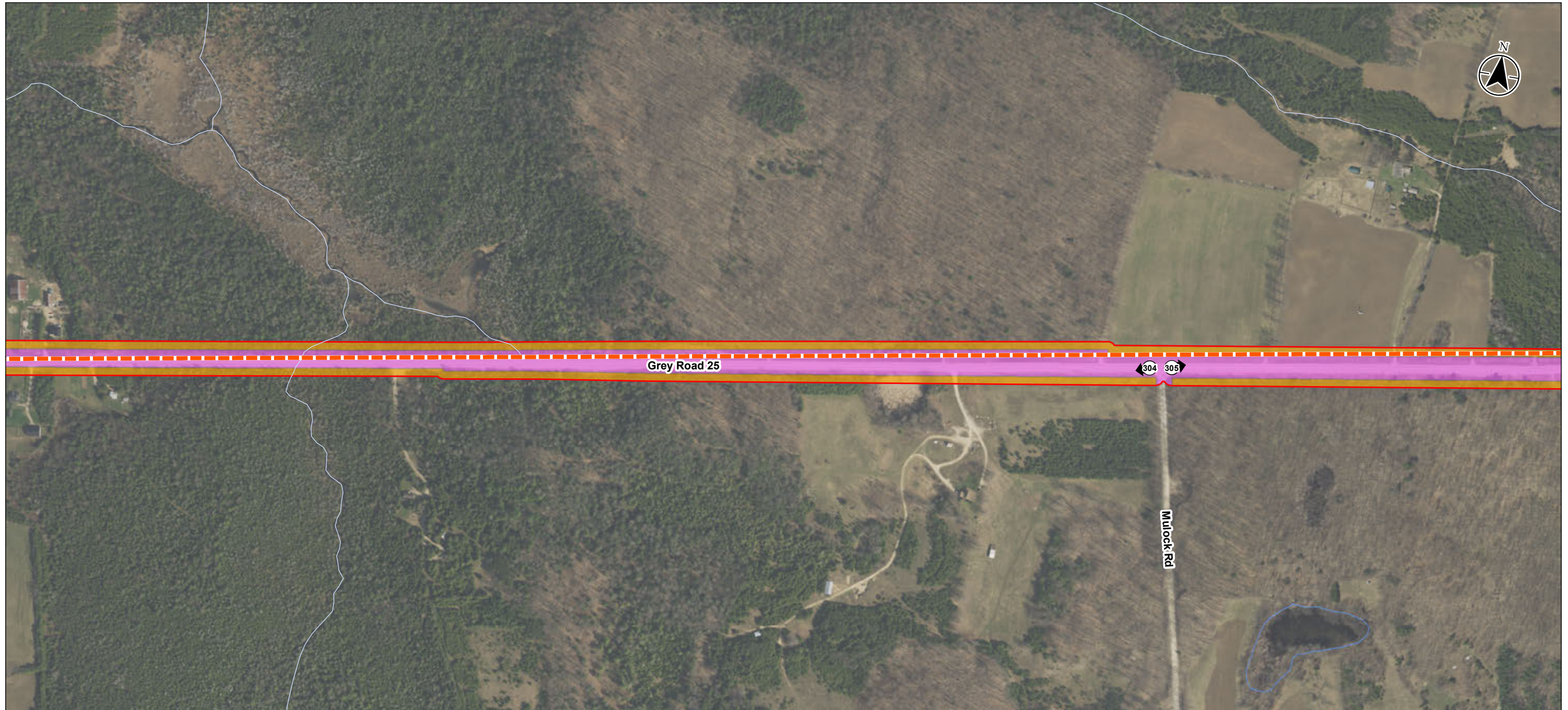
Title: **Results Index – Stage 1 Property Inspection Results**

Notes

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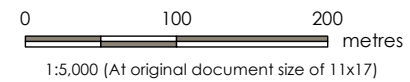
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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

1. Coordinate System: NAD 1983 UTM Zone 17N
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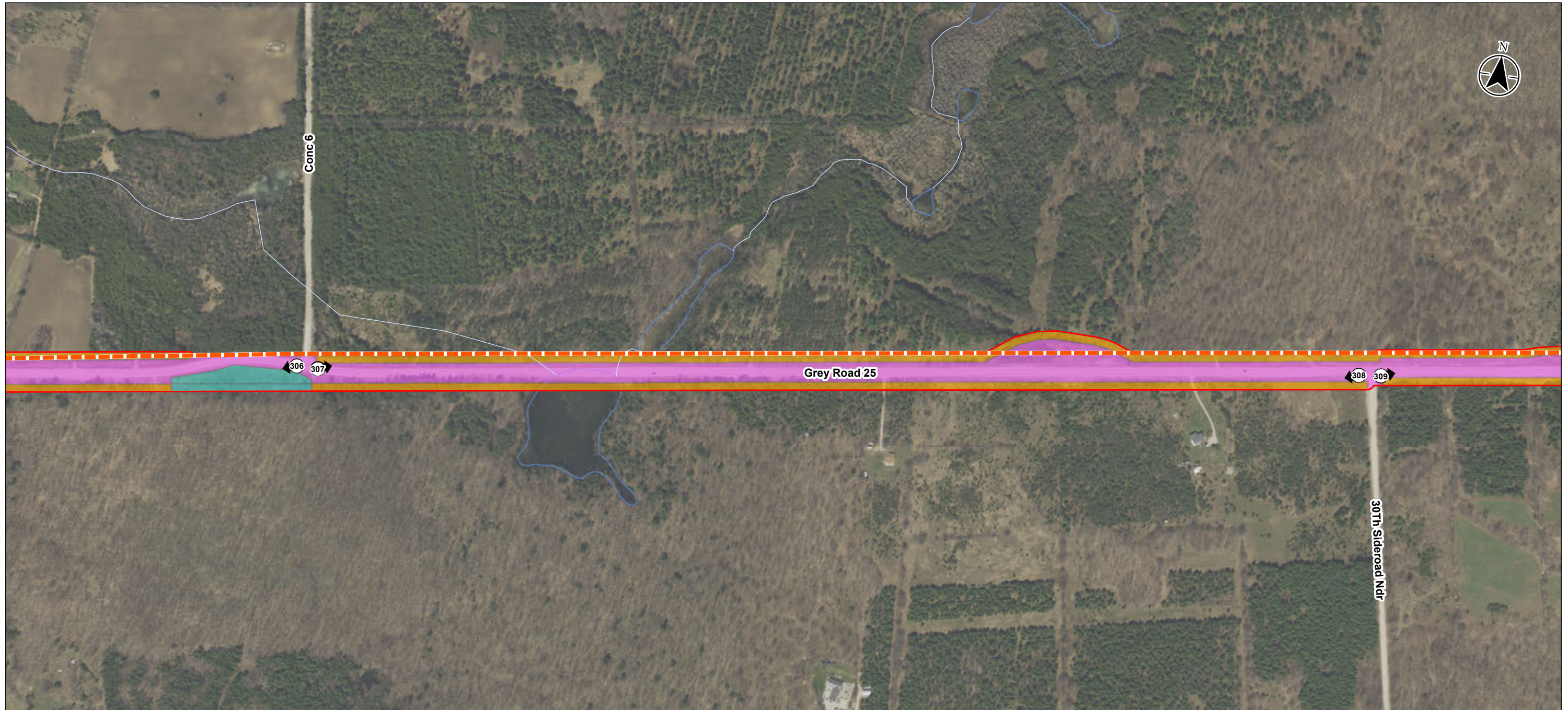
Project Location: Counties Of Bruce, Grey and Huron
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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-75**

Title: **Results Index – Stage 1 Property Inspection Results**

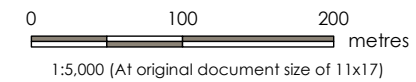
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- Legend**
- Preliminary Preferred Route
 - Study Area
 - No Potential (Steeply Sloped)
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody

Notes

1. Coordinate System: NAD 1983 UTM Zone 17N
2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © Queen's Printer for Ontario, 2018.
3. Orthoimagery © MNRF, 2015. Imagery Date, 2015.



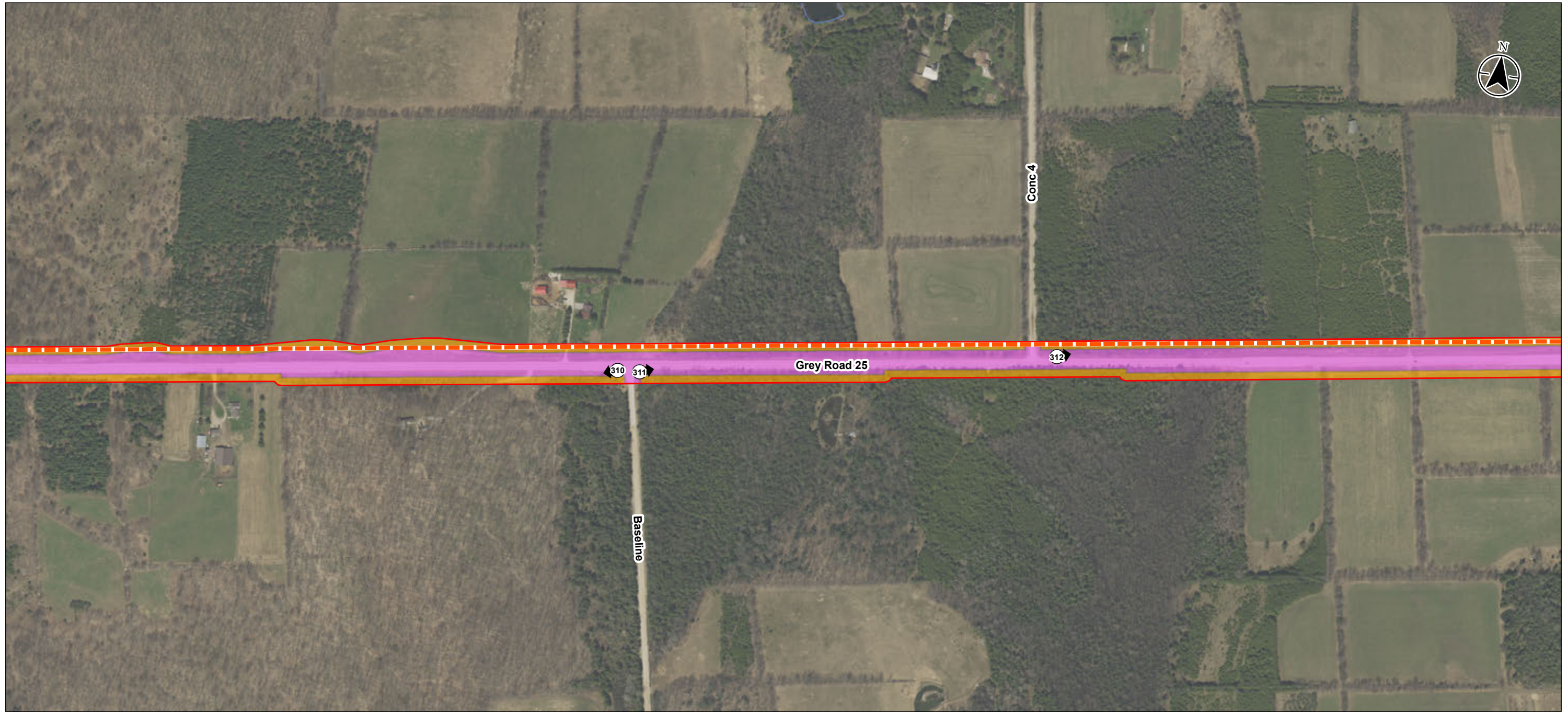
Project Location: Counties Of Bruce, Grey and Huron
 Prepared by SPE on 2018-12-17
 Technical Review by BCC on 2018-06-13
 160950831 REVA

Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No. **5-76**

Title: **Results Index – Stage 1 Property Inspection Results**

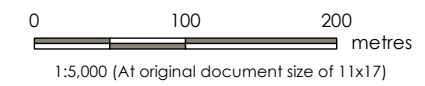
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- Legend**
- - - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Waterbody

Notes

1. Coordinate System: NAD 1983 UTM Zone 17N
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3. Orthoimagery © MNRF, 2015. Imagery Date, 2015.

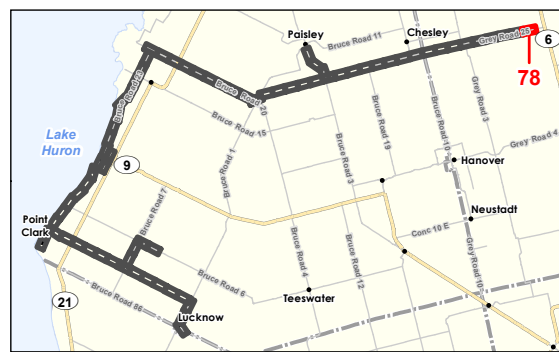
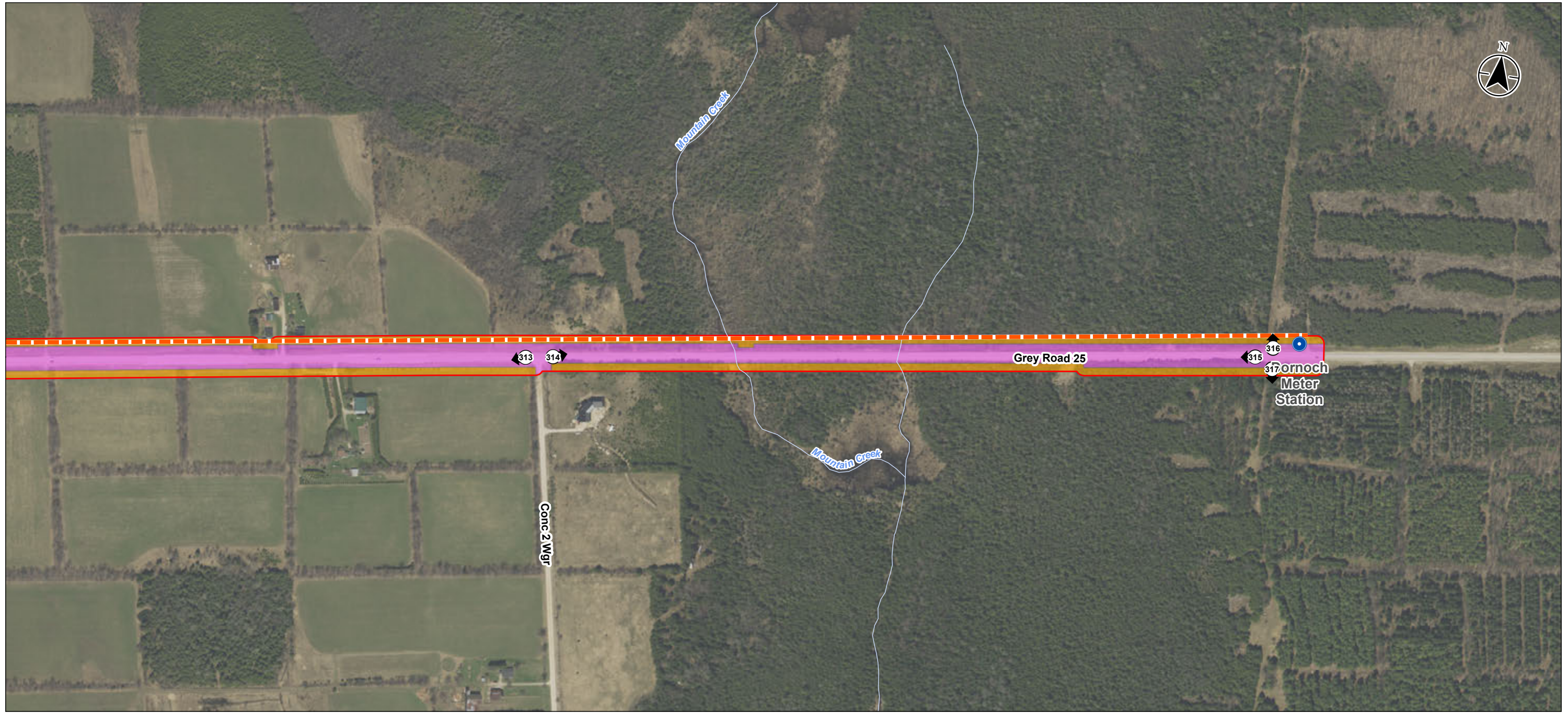


Project Location: Counties Of Bruce, Grey and Huron
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Client/Project: EPCOR UTILITIES INC.
 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-77**
 Title: **Results Index – Stage 1 Property Inspection Results**

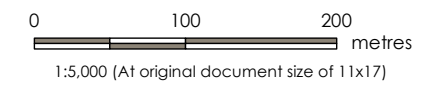
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- Legend**
- Meter Station
 - Preliminary Preferred Route
 - Study Area
 - No Potential (Disturbed)
 - Potential (Requires Stage 2 Test-pit Survey at a 5m Interval)
 - Major Road
 - Minor Road
 - Watercourse

Notes

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 NATURAL GAS SERVICE KINCARDINE
 STAGE 1 ARCHAEOLOGICAL ASSESSMENT

Figure No.: **5-78**

Title: **Results Index – Stage 1 Property Inspection Results**

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Interrogatory 16:

Reference: Environmental Report, Appendix A, Figure A-2¹¹

Preamble: *“Figure A-2 appears to show that the distribution systems within the Southern Bruce Municipalities was included within the study area of the Environmental Report.”*

Questions:

- (a) Please confirm that the distribution systems within the Southern Bruce Municipalities was included within the study area of the Environmental Report

Responses:

- (a) The distributions systems within the Southern Bruce Municipalities were not included within the Study Area of the Environmental Report. The Study Area was established as the area within 500 meters on either side of the mainline and alternative routes. The distribution systems will be constructed pursuant to ENGLP’s Certificates of Public Convenience and Necessity, and will comply with the environmental screening criteria as described in *Appendix B The Ontario Energy Board Guidelines for Assessing and Reporting on Natural Gas System in Ontario*¹².

¹¹ <https://www.epcor.com/products-services/infrastructure/Pages/southern-bruce-infrastructure.aspx>

¹² *Report to The Ontario Energy Board on The Alternative Dispute Resolution Conference in E.B.O. 188 A Generic Hearing on Natural Gas System Expansion in Ontario.*



Interrogatory 17:

Reference: Exhibit A, Tab 9, Schedule 1, page 1
Exhibit A, Tab 9, Schedule 4, pages 2-3

Preamble: *“EPCOR provided a copy of the Environmental Report to each member of the Ontario Pipeline Coordinating Committee (OPCC) on July 18, 2018. EPCOR received comments from and sent replies to each the Ministry of the Environment, Conservation and Parks (MECP), Ministry of Natural Resources and Forestry (MNRF) and the Technical Standards and Safety Authority (TSSA).”*

Questions:

- (a) Has confirmation been received from the MECP that EPCOR’s responses regarding landfills are acceptable? Are there any outstanding issues regarding the MECP and landfills?
- (b) Has confirmation been received from the MNRF that EPCOR’s responses regarding species at risk, aquatic life, etc., are acceptable? Are there any outstanding issues regarding the MNRF and species at risk, aquatic life, etc.?
- (c) Has confirmation been received from the TSSA that EPCOR’s responses regarding the technical specifications of the pipeline are acceptable? Are there any outstanding issues regarding the TSSA and the technical specifications of the pipeline?
- (d) Please file an update on the comments (in tabular format) that EPCOR has received as part of the OPCC review since the time the Application was filed. Include the dates of communication, the issues and concerns identified by the parties, as well as EPCOR’s responses and actions to address these issues and concerns.

Responses:

- (a) On April 30, 2019 ENGLP received an email from the MECP confirming that ENGLPs mitigation measures regarding landfills are acceptable. The email from the MECP is attached. There are no outstanding issues regarding the MECP and landfills. ENGLP will



provide formal notification to the MECP if any adverse conditions are identified during the construction as per the sampling and analysis protocol identified by ENGLP.

- (b) On September 20, 2018 ENGLP received a response from Mr. Ken Mott, District Planner, Midhurst District, MNRF, indicating that the MNRF had no further comments at the time based on the information provided to date. There are no outstanding issues regarding the MNRF and species at risk, etc.
- (c) On April 30, 2019 ENGLP received a confirmation letter from the TSSA that ENGLP's submitted design criteria meets O. Reg 210\01 and Oil and Gas Pipeline code adoption document, FS-238-18. The letter from the TSSA is attached. There are no outstanding issues regarding the TSSA and the technical specifications of the pipeline. ENGLP will keep the TSSA updated on construction progress and activity and will comply with all audit and quality control requirements of the TSSA.
- (d) Table OEB-17-1 summarizes the updated comments that ENGLP has received as part of the OPCC review since the time this Application was filed. The table includes the dates of communication, the issues and concerns identified by the parties, as well as ENGLP's responses and actions to address these issues and concerns.



Table OEB 17-1: OPCC Members Updated Comments

Comment Number	Report Section	Comment and ENGLP Response
<p>Comments Provided By: Ministry of Natural Resources and Forestry (MNRF) <i>Source: Letter dated September 13, 2018 (“By Email Only”)</i></p>		
<p>MNRF_1</p>	<p>4.5 Summary of Recommendations, Table 4-7: Species at Risk (SAR)</p> <p>AND</p> <p>4.3.1 Aquatic Species and Habitat, Aquatic Species at Risk</p>	<p>Comment:</p> <p><i>Species at Risk: the list of potential species provided is very thorough. SAR have been addressed at a broad scale as it would appear that no surveys or field work have occurred along the proposed route to date.</i></p> <p><i>MNRF feels the proposed mitigation for SAR is adequate but recommends the following additions listed below to avoid any impacts to threatened and endangered species or their habitat;</i></p> <ul style="list-style-type: none"> • <i>SAR Bats – table 4-7 Mitigation for Tree Removal. This mitigation should be adjusted to reflect the active season for bats which is generally April 1 to October 31. In areas observed to have bats, no tree removal should occur during this time.</i> • <i>Rainbow Mussel – provincial status has changed to Special Concern as of June 2017. However, it is still “Endangered” under the federal Species at Risk Act.</i> <p>Response, Applicable Mitigation and/or Commitment:</p> <p>Comment noted. EPCOR will follow mitigation measures to prevent tree removal during the active season for bats (April 1 – October 31). If bats are observed in the area where trees are to be removed, work will be delayed until after October 31 and before April 1. EPCOR will follow mitigation measures for the Rainbow Mussel appropriate for the provincial status and federal status requirements. These mitigation measures will be added to the Project specific Environmental Protection Plan.</p>
<p>MNRF_2</p>	<p>4.3.4 Species at Risk (SAR), Mitigation and Protective Measures</p>	<p>Comment:</p> <p><i>Reptiles and Amphibians: the mitigation section recommends that work is to occur outside the breeding season. If this is not possible, then the area should be surveyed prior to starting any work to ensure that no species are present. Should any turtles be found in the area, exclusion fencing should be installed to ensure they do not enter the area during the period of work.</i></p> <p>Response, Applicable Mitigation and/or Commitment:</p> <p>Comment noted. If work is required to be conducted during the reptile and amphibians breeding season, the area will be surveyed prior to starting work to ensure that no species are present. If turtles are found in the area, exclusion fencing will be installed to ensure they do not enter the area during the period of work. This mitigation measure will be added to the Project specific Environmental Protection Plan.</p>



Comment Number	Report Section	Comment and ENGLP Response
MNRF_3	4.3.1 Aquatic Species and Habitat, General Mitigation Measures	<p>Comment:</p> <p><i>Fisheries: the report references timing windows that are not appropriate for Grey or Bruce counties. These timing windows should be changed to:</i></p> <ul style="list-style-type: none"> • <i>Coldwater timing window – work allowed July 1 to September 30</i> • <i>Warmwater timing window – work allowed July 15 to March 15</i> • <i>Coolwater/migratory timing window – work allowed July 15 to September 30</i> <p><i>Additionally, the report identifies the South Pine River as being a warmwater system. It does, however, have a migratory run of salmonids and as such should be considered Coolwater/migratory with the appropriate timing windows applied.</i></p> <p>Response, Applicable Mitigation and/or Commitment:</p> <p>Comment noted. The timing windows provided by the MNRF for Grey and Bruce counties will be followed, as listed above. This mitigation measure will be added to the Project specific Environmental Protection Plan.</p>
<p>Comments Provided By: Ministry of Natural Resources and Forestry (MNRF)</p> <p>Source: Email Response to emailed letter dated September 20, 2018 (“OPCC – MECP, MNRF, HSM Comment Response”)</p>		
MNRF_4	N/A	<p>Comment:</p> <p><i>MNRF has no further comments at this time based on the information provided to date.</i></p> <p>Response, Applicable Mitigation and/or Commitment:</p> <p>No further response, applicable mitigation and/or commitment required.</p>



Comments Provided By: Ministry of the Environment, Conservation and Parks (MECP)
Source: Email dated August 23, 2018

MECP_1	<p>3.0 Consultation Program, Agency Input</p> <p>AND</p> <p>4.4.6 Contaminated Sites</p>	<p>Comment:</p> <p><i>Section 3.5.2.2 suggests that no additional mitigation or protective measures from ministry consultation were incorporated. However, waste sites are further described in Section 4.4.6 The Mitigation and Protective measures described on page 4.67 speak to soil and water contamination mainly from construction, but do not appear to directly address closed and/or active landfill sites. Measures for landfill sites including leachate or methane contaminate should be identified. Alternatively, if it is determined that the waste sites pose no concern to the project, the methodology for this determination should be included. Please note that MECP did not verify the identified landfill or contaminated site locations in Figure C-2.</i></p> <p>Response, Applicable Mitigation and/or Commitment:</p> <p>Data for closed and active landfill sites were sourced using mapping from the Bruce County Official Plan and Ontario landfill location points from the Waste Disposal Site Inventory provided by Ministry of Environment and Climate Change (now Ministry of Environment Conservation and Parks) in June 1991. Based on these two datasets, the lateral distance between the closest landfill site and the location of the preferred pipeline route, near the Town of Ripley, Ontario was determined to be 60m. Distance to the next closest landfill site to the preferred pipeline route is greater than 325 m. Based on the above stated separation distances between the landfill sites to the location of the pipeline route, it is our opinion that any potentially contaminating activities from surrounding landfills will not create and environmental concern to the Project.</p> <p>If construction of a pipeline route was to traverse through a landfill in a hypothetical worst case scenario, then there could be possible corrosion to the pipeline itself (salt from landfill leachate) and/or explosion from combustion of accumulated landfill methane gas when cutting steel pipe, or by workers smoking in the work area.</p> <p>In the Town of Ripley where the preferred pipeline route is at its closest to a landfill site (approximately 60m), adherence to EPCOR health and safety requirements would require all workers to wear protective rubber boots, should these workers be exposed to water accumulated at the bottom of a trench; thus protecting workers from any possible dermal exposure to landfill leachate.</p> <p>Adherence to EPCOR health and safety requirements will also eliminate any dangers from any potential methane exposure. These include:</p> <ol style="list-style-type: none"> 1. Daily use of hand-held gas monitors to detect concentration levels and explosive levels of combustible gases including methane gas 2. No smoking is allowed within the work area. Dedicated smoking areas will be set up in Safe Zones. 3. Restriction on any use of welding on the project. The pipeline specified for this project in the Town of Ripley is medium density polyethylene pipe and therefore no welding will be occurring. <p>These mitigation measures will be added to the Project specific Environmental Protection Plan.</p>
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Comments Provided By: Ministry of the Environment, Conservation and Parks (MECP)
Source: Response to emailed 'South Bruce Natural Gas Landfill Impact Assessment', dated December 12, 2018 received April 30, 2019

MECP_2	N/A	<p>Comment:</p> <p><i>The Ministry of Environment, Conservation and Parks Southwestern Region have reviewed the package submitted by Stantec Consulting Ltd. regarding the EPCOR Natural Gas Line proposed for South Bruce County, as dated December 12, 2018. The report prepared by Stantec is thorough and comprehensive. It is to be noted only 2 of the 9 landfills found within 500 m of the proposed pipeline were active and of the 7 closed landfill sites they have been closed for at minimum 40 years and at maximum 74 years. Information provided on all 9 landfills gave the level of detail needed to adequately assess the impact potential of landfill generated leachate and methane gas.</i></p> <p><i>This ministry's Southwestern Region concurs with the conclusions of the report that there is low probability of the pipeline trenching encountering landfill leachate or landfill gas. This ministry's Southwestern Region commends Stantec for proposing the groundwater sampling and analysis program as an added level of security should groundwater be encountered in any excavation. This ministry's Southwestern Region offers the same comment for the planned onsite methane monitoring. This ministry's Southwestern Region would, however, suggest that review of any analytical data also give due consideration towards other non-landfill potential sources should elevated concentrations result.</i></p> <p><i>The mitigating measure of installing bentonite trench plugs is anticipated to address any potential for the pipeline trench to act as a conduit for fugitive contaminants from any source.</i></p> <p><i>Should the unexpected occur and the presence of landfill leachate and or gas be confirmed in a pipeline trench this would be a finding of considerable significance given that landfill by-products migrating off an approved waste disposal site at elevated concentrations is in contravention of the EPA Part V Regulation 347. As such, EPCOR/Stantec must provide formal notification to the MECP Owen Sound District Office of such an instance at the earliest opportunity possible, should one occur.</i></p> <p>Response, Applicable Mitigation and/or Commitment:</p> <p>No further response, applicable mitigation and/or commitment required.</p>
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Comments Provided By: Historic Saugeen Metis (HSM)
Source: Email dated August 15, 2018 and Email dated August 28, 2018

HSM_1	N/A	<p>Comment</p> <p><i>In our e-mail to you dated August 15, 2018, we were careful to point out the following clarification: "Environmental Report (July 16, 2018) - Clarifications noted – HSM is referenced below as MNO and/ or Métis Nation. HSM is an</i></p>
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		<p><i>independent historic Métis Community and is not affiliated with the Métis Nation of Ontario. The correct term is Métis or Métis community when HSM is referenced with other Métis communities.” The potential for confusion occurs when “Metis Nation” is used for readers or audiences in Ontario because it is often assumed that it means “Metis Nation of Ontario” or (MNO). Therefore, the term “Metis Nation” would not include Historic Saugeen Metis as we are not a member of the Metis Nation of Ontario. The safest expression would be to use Historic Saugeen Metis with the acronym HSM.</i></p>
		<p>Response, Applicable Mitigation and/or Commitment:</p> <p>The Historic Saugeen Metis (HSM) will be referred to as a “Metis Community” and the acronym HSM will be used in future correspondence and documentation.</p>
<p>Comments Provided By: Technical Standards and Safety Authority (TSSA) <i>Source: Emailed letter dated April 30, 2019</i></p>		
TSSA_1	N/A	<p>Comment:</p> <p><i>[The TSSA] reviewed the submitted Design and Pipe specifications and Pipeline Hazard Analysis and High Consequence Area analysis related to this project. Submitted design criteria meets O. Reg. 210/01 and Oil and Gas Pipeline code adoption document, FS-238-18. We will visit this site as part of our audit and witnessing the pressure tests.</i></p>
		<p>Response, Applicable Mitigation and/or Commitment:</p> <p>No further response, applicable mitigation and/or commitment required.</p>
<p>Comments Provided By: Ministry of Culture, Tourism & Sports <i>Source: Email dated May 1, 2019</i></p>		
MTCS_1	N/A	<p>Comment:</p> <p><i>Your request for an expedited review of report number 47502 submitted under Project Information Form P392-0189-2016 on Apr 24, 2019 has been granted. We expect that the review of this report will be completed by May 29, 2019. We have noted the requested review date, and if possible we will attempt to complete the review by this date.</i></p> <p><i>Thank you for your expedited review request. This request has been granted but, depending on the volume of requests, it may take a minimum of 20 business days from the time the ministry grants the request for an expedited review to be completed.</i></p> <p><i>If you have any questions please use PastPort's 'Ask a question' feature in the Report module or send an e-mail to Archaeology@ontario.ca. Please do not reply directly to this e-mail.</i></p>
		<p>Response, Applicable Mitigation and/or Commitment:</p> <p>No further response, applicable mitigation and/or commitment required.</p>



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Toronto, Ontario M9W 6N9
Tel.: 416.734.3300
Fax: 416.231.1626
Toll Free: 1.877.682.8772
www.tssa.org

April 30, 2019

Mr. Kevin Sonnenberg
EPCOR Natural Gas Limited Partnership
10423-101 St. NW, unit 2000
Edmonton, AB, T5H 0E8

SR# 2363498

Re: Southern Bruce Natural Gas Pipeline Project

Dear Mr. Kevin Sonnenberg,

This is in response to your submitted EPCOR Pipeline Project application dated August 02, 2018 about the Southern Bruce Natural Gas Pipeline Project to service the Southern Bruce, Ontario. The project is to install 75 km of Nominal Pipe Size (NPS) 8 to 6-inch steel high pressure (HP) pipe and approximately 52 km of NPS 6-inch high density polyethylene (HDPE) pipe (the Project). This pipeline will be the backbone for service to multiple communities throughout Southern Bruce. Through a combined 165 km of distribution piping, natural gas service will be provided to a maximized number of customer connections including residential, commercial, agricultural and industrial customers.

I reviewed the submitted Design and Pipe specification and Pipeline Hazard Analysis and High Consequence Area analysis related to this project. Submitted design criteria meets O.Reg. 210/01 and Oil and Gas Pipeline code adoption document, FS-238-18. We will visit this site as part of our audit and witnessing the pressure tests.

Should you have any questions, please contact me at 416.734.3539 or by e-mail at kmanouchehri@tssa.org. When contacting TSSA regarding this file, please refer to the Service Request number provided above.

Yours truly,

A handwritten signature in black ink, appearing to read "Kourosh Manouchehri".

Kourosh Manouchehri, P.Eng.,
Fuels Safety Engineer
Tel.: (416) 734-3539
Fax: (416) 231-7525

c. Ms. Zora Crnojacki
Chairperson, OPCC
Ontario Energy Board

From: [Newton, Craig \(MECP\)](#)
To: [Litwinow, Ryan](#)
Cc: zora.crnojacki@ontarioenergyboard.ca; Rooley.Georgopoulos@stantec.com; Emily.Hartwig@stantec.com; [Lafrance, Crystal \(MECP\)](#); [Chappell, Rick \(MECP\)](#); [Sonnenberg, Kevin](#); [Thomas, Simon](#); [Zumbado, Andres](#); [Harman, Bruce \(MECP\)](#); [Eckert, Anneleis \(MECP\)](#)
Subject: FW: OPCC - MECP, MNRF, HSM Comment Response
Date: Tuesday, April 30, 2019 7:30:02 AM
Attachments: [image001.png](#)
[RE OPCC - MECP MNRF HSM Comment Response.msg](#)

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Please report any suspicious email to the EPCOR Service Desk.

Dear Mr. Litwinow:

Thank you for your voice mail message and immediately preceding e-mail of yesterday, April 29th, 2019. This e-mail also acknowledges this ministry's receipt of your December 12th, 2018 e-mail and accompanying attachments.

In response, the Ministry of Environment, Conservation and Parks Southwestern Region have reviewed the package submitted by Stantec Consulting Ltd. regarding the EPCOR Natural Gas Line proposed for South Bruce County, as dated December 12, 2018. The report prepared by Stantec is thorough and comprehensive. It is to be noted only 2 of the 9 landfills found within 500 m of the proposed pipeline were active and of the 7 closed landfill sites they have been closed for at minimum 40 years and at maximum 74 years. Information provided on all 9 landfills gave the level of detail needed to adequately assess the impact potential of landfill generated leachate and methane gas.

This ministry's Southwestern Region concurs with the conclusions of the report that there is low probability of the pipeline trenching encountering landfill leachate or landfill gas. This ministry's Southwestern Region commends Stantec for proposing the groundwater sampling and analysis program as an added level of security should groundwater be encountered in any excavation. This ministry's Southwestern Region offers the same comment for the planned onsite methane monitoring. This ministry's Southwestern Region would, however, suggest that review of any analytical data also give due consideration towards other non-landfill potential sources should elevated concentrations result.

The mitigating measure of installing bentonite trench plugs is anticipated to address any potential for the pipeline trench to act as a conduit for fugitive contaminants from any source.

Should the unexpected occur and the presence of landfill leachate and or gas be confirmed in a pipeline trench this would be a finding of considerable significance given that landfill by-products migrating off an approved waste disposal site at elevated concentrations is in contravention of the EPA Part V Regulation 347. As such, EPCOR/Stantec must provide formal notification to the MECP Owen Sound

District Office of such an instance at the earliest opportunity possible, should one occur.

If you have any concerns or questions please do not hesitate to contact me.

Yours truly,

Craig Newton
Regional Environmental Planner / Regional EA Coordinator
Ministry of the Environment, Conservation and Parks
Southwestern Region
733 Exeter Road
London, Ontario
N6E 1L3

Telephone: (519) 873-5014
E-mail: craig.newton@ontario.ca

From: Litwinow, Ryan <RLitwinow@epcor.com>

Sent: April-29-19 1:34 PM

To: Newton, Craig (MECP) <Craig.Newton@ontario.ca>

Cc: Lafrance, Crystal (MECP) <Crystal.Lafrance@ontario.ca>; Eckert, Anneleis (MMAH) <Anneleis.Eckert@ontario.ca>; Zumbado, Andres <AZumbado@epcor.com>

Subject: RE: OPCC - MECP, MNRF, HSM Comment Response

Craig,

Good afternoon. I have missed you the past few days and have left a few voice messages at the phone number Anneleis provided last week. I wanted to follow up to see if you had a chance to review the information EPCOR has provided regarding the assessment of the landfills within 3km of the PPR and the monitoring and mitigation measures captured in the Southern Bruce Natural Gas Landfill Assessment (attached).

Please do not hesitate to call if any additional information or background is required.

Thank you
Ryan

Ryan Litwinow

Senior Manager, Industrial and Major Projects

EPCOR Project & Technical Services

P: 780-412-7893

C: 587-986-0959

rlitwinow@epcor.com

PROVIDING MORE

EPCOR

From: Litwinow, Ryan <RLitwinow@epcor.com>
Sent: Thursday, April 25, 2019 9:08 AM
To: Eckert, Anneleis (MMAH) <Anneleis.Eckert@ontario.ca>
Cc: Newton, Craig (MECP) <Craig.Newton@ontario.ca>; Lafrance, Crystal (MECP) <Crystal.Lafrance@ontario.ca>
Subject: Re: OPCC - MECP, MNRF, HSM Comment Response

Anneleis,

Thank you. I will follow up with Craig today.

Thank you
Ryan

Sent from my iPhone

On Apr 25, 2019, at 8:56 AM, Eckert, Anneleis (MMAH) <Anneleis.Eckert@ontario.ca> wrote:

Notice: External Email

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Please report any suspicious email to the EPCOR Service Desk.

Hello Ryan,

Thank you for following up. I am currently on assignment to another ministry. Craig Newton will be better able to respond to your enquiry. I have cc'd him on this email. He can also be reached at craig.newton@ontario.ca or 519-873-5014.

Thank you,

Anneleis Eckert, Planner
Municipal Services Office – West
Municipal Services Division
Ministry of Municipal Affairs and Housing
659 Exeter Road 2nd Floor
London ON N6E 1L3
anneleis.eckert@ontario.ca | 519-873-4768

From: Litwinow, Ryan <RLitwinow@epcor.com>
Sent: April 25, 2019 10:49 AM
To: Eckert, Anneleis (MMAH) <Anneleis.Eckert@ontario.ca>
Cc: zora.crnojacki@ontarioenergyboard.ca; Rooly.Georgopoulos@stantec.com;
Emily.Hartwig@stantec.com; Lafrance, Crystal (MECP) <Crystal.Lafrance@ontario.ca>;
Chappell, Rick (MECP) <Rick.Chappell@ontario.ca>; Sonnenberg, Kevin
<KSonnenberg@epcor.com>; Thomas, Simon <stthomas@epcor.com>; Zumbado,
Andres <AZumbado@epcor.com>
Subject: RE: OPCC - MECP, MNRF, HSM Comment Response

Anneleis,

Good morning. Further to our correspondence in 2018 I would like to following up to see if you had any further questions or comments on EPCOR's assessment of the landfills within 3km of the PPR and the monitoring and mitigation measures captured in the Southern Bruce Natural Gas Landfill Assessment (attached)?

Please do not hesitate to call if any additional information is required.

Thank you
Ryan

Ryan Litwinow
Senior Manager, Industrial and Major Projects
EPCOR Project & Technical Services
P: 780-412-7893
C: 587-986-0959
rlitwinow@epcor.com
<image001.png>

From: Litwinow, Ryan
Sent: Wednesday, December 12, 2018 4:43 PM
To: Anneleis.Eckert@ontario.ca
Cc: zora.crnojacki@ontarioenergyboard.ca; Rooly.Georgopoulos@stantec.com;
Emily.Hartwig@stantec.com; Crystal.Lafrance@ontario.ca; Rick.Chappell@ontario.ca;
Sonnenberg, Kevin <KSonnenberg@epcor.com>; Thomas, Simon
<stthomas@epcor.com>; Zumbado, Andres <AZumbado@epcor.com>
Subject: RE: OPCC - MECP, MNRF, HSM Comment Response

Anneleis,

Good afternoon. Since her last correspondence in October, Audrey Cudrak has transferred to a new position within EPCOR. I had worked closely with Audrey to address the questions you presented in August and I will be the primary contact if any additional questions come up.

Please find attached the South Bruce Natural Gas Landfill Impact Assessment. We have completed an assessment of the landfills within 3km of the proposed pipeline route (PPR) in response to your email dated August 23, 2018 and subsequent correspondence. The assessment identifies all landfills within 3km of the PPR and the methodology to confirm if the landfills present a probability of interaction with the PPR. The conclusions are supported by the identification of physical barriers between the landfill sites and the PPR as well as other environmental features. Where probability of interaction could not be eliminated, additional monitoring and mitigation measures have been identified and are included in the report.

We believe the concerns raised by the MECP have been fully addressed, including additional monitoring and mitigation measures and are captured within the assessment. Please advise if any further action or additional follow-up is required.

Regards,

Ryan

Ryan Litwinow

Senior Manager, Industrial and Major Projects

EPCOR Project & Technical Services

P: 780-412-7893

C: 587-986-0959

rlitwinow@epcor.com

<image001.png>

From: Cudrak, Audrey

Sent: October-03-18 2:23 PM

To: Anneleis.Eckert@ontario.ca

Cc: zora.crnojacki@ontarioenergyboard.ca; Rooly.Georgopoulos@stantec.com; Emily.Hartwig@stantec.com; Crystal.Lafrance@ontario.ca; Rick.Chappell@ontario.ca;

Sonnenberg, Kevin; Litwinow, Ryan

Subject: RE: OPCC - MECP, MNRF, HSM Comment Response

Good afternoon Anneleis – thank you for your voice mail from this morning, it was very helpful. As per your message, here are the mitigation measures we are proposing should we encounter landfill leachate or methane during the open trench excavation and installation of this pipeline:

1. With regards to the potential of encountering landfill leachate introduced into the excavation trenches, locations of all active and landfill sites within 500m of the pipeline route have been mapped in the ER and more detailed maps are under development. Landfill leachate is characteristic of elevated levels of electrical conductivity (EC) and total dissolved solids (TDS) as general landfill leachate indicator parameters in groundwater. For mapped areas along the pipeline route that intersect with this 500m buffer and where groundwater is encountered at the base of the excavation trench, that groundwater will be field

tested for leachate pollutant indicator parameters EC and TDS using a hand-held meter (e.g. YSI 556, Hach TSS Meter, or other equivalent model units) and those values will be compared to EC values of background areas outside the 500m buffer. For groundwater in those locations where presence of landfill leachate is confirmed, those areas will be identified on a map as requiring measures to be taken so as to prevent the pipeline trench from behaving as a conduit for landfill leachate. Those measures include the installation of bentonite trench plugs every 100m, until the construction exits the intersected 500m zone. Bentonite is an impermeable material that upon interaction with water will swell forming an impermeable seal, thus eliminating any potential pathway along the route of the pipeline.

2. With respect to the potential of encountering landfill methane gas build up within the open trench, Section D-4-1 of the Guidelines states: "methane cannot cause an explosion unless it accumulates to a concentration above its lower explosive limit in an enclosed space where it can be ignited" During the construction, it is expected that all subsurface gases will be exposed and dissipated into the atmosphere once the trench is opened. The trench will be backfilled shortly after the pipe is installed therefore we do not anticipate any conditions that would encourage accumulation of gases. However we will have hand-held gas meters at every crew location and will ensure the atmosphere in the trench is safe prior to any person entering the trench. Should we encounter the presence of methane, similar measures as described above will be implemented to eliminate any potential pathway along the pipeline.

I will call you tomorrow to confirm that these mitigation measures meet your requirements. I can also give you a quick update on our plans for further assessment of the landfills within 500m of the project based on the advice you provided. I will be able to follow up in writing with the specific details once I have them from our environmental consultant.

Thank you,

Audrey

Audrey A. Cudrak, M.Eng., P.Eng.
Director, Project & Technical Services
EPCOR Commercial Services
2000 – 10423 101 Street NW
Edmonton, AB
Canada
T5H 0E8
T: (780) 412-7970
F: (780) 412-3013
E: acudrak@epcor.com

From: Cudrak, Audrey
Sent: October-01-18 8:53 AM
To: 'Anneleis.Eckert@ontario.ca'
Cc: zora.crnojacki@ontarioenergyboard.ca; 'Rooly.Georgopoulos@stantec.com'; 'Emily.Hartwig@stantec.com'; 'Crystal.Lafrance@ontario.ca'; 'Rick.Chappell@ontario.ca'; Sonnenberg, Kevin; Litwinow, Ryan
Subject: OPCC - MECP, MNRF, HSM Comment Response

Good morning Anneleis, thank you for the comments and concerns in your email of September 21st. All of these concerns are valid and we are seeking to address them. We have some thoughts regarding assessment of potential impact from the landfills in the ER study area, but we were hoping to have a discussion with you to better clarify your requirements and obtain your guidance on next steps. We also have determined appropriate precautionary and mitigation measures to minimize/avoid the effects of potential landfill methane and leachate that may or may not be encountered during the open trench excavation and installation of this pipeline. These can also be discussed on the call if you wish.

Can you please let me know of a few time slots (maybe one hour?) when you are available this week? We would like to include our environmental consultant (Stantec) as well.

Many thanks and I look forward to hearing from you.

Audrey

Audrey A. Cudrak, M.Eng., P.Eng.
Director, Project & Technical Services
EPCOR Commercial Services
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Interrogatory 18:

Reference: Exhibit A, Tab 9, Schedule 1, page 2

Preamble: *“EPCOR will develop an Environmental Protection Plan (EPP) which will include the mitigation measures identified in the Environmental Report including future revisions. The EPP will provide site specific mitigation programs to be implemented during the construction of the Project.”*

Questions:

- (a) Please provide an update on the EPP including the date by which it is anticipated to be fully completed. If a draft or the final plan is now available, please file the draft into evidence.

Responses:

- (a).A preliminary version of the EPP is expected to be completed by the end of May 2019. The final version is expected to be completed by June 30th 2019.



Interrogatory 19:

Reference: Exhibit A, Tab 9, Schedule 1, page 4

Preamble: *“EPCOR’s public engagement process was initiated in October 2015. Consultation and correspondence to date can be found in the Environmental Report. Correspondence, meetings and input from interested and affected parties after the date the application was filed will continue to be tracked and considered as consultation is ongoing.”*

Questions:

- (a) Please provide an update on correspondence, meetings and input associated with the ongoing public engagement process.

Responses:

- (a) A summary of public engagement activities after the Environmental Report was issued can be found in the Tables OEB-19-1 and OEB-19-2 below.

Table OEB 19-1: Agency Correspondence

	Correspondent	Date	Type	Subject Matter
1	Municipality of Brockton	July 23, 2018	Council Meeting	Project Overview, Request for Municipal Bylaw and Model Franchise Agreement
2	Municipality of West Grey	July 30, 2018	Council Meeting	Project Overview, Request for Municipal Bylaw and Model Franchise Agreement
3	Township of Chatsworth	August 1, 2018	Council Meeting	Project Overview, Request for Municipal Bylaw and Model Franchise Agreement
4	Bruce Beach Cottagers Association	August 4, 2018	AGM Meeting	Project Overview and response to community questions
5	Municipality of Brockton	August 27, 2018	Council Meeting	Project Overview, Request for Municipal Bylaw and Model Franchise Agreement
6	Grey County	January 17, 2019	Meeting	Project pipeline alignment
7	Bruce County	January 17, 2019	Meeting	Project pipeline alignment



8	Bruce County	March 5, 2019	Meeting	Project pipeline alignment
9	Grey County	March 5, 2019	Meeting	Project pipeline alignment

Table OEB 19-2: Public Correspondence

	Date	Type	Subject Matter
1	July 14, 2018	Email	The correspondent inquired about project timing and connection to the natural gas system.
2	July 13, 2018	Email	The correspondent inquired about the construction methods for home connections.
3	July 15, 2018	Email	The correspondent inquired about a connection to the natural gas system.
4	July 15, 2018	Email	The correspondent inquired about connection to the natural gas system.
5	July 16, 2018	Email	The correspondent inquired about employment opportunities.
6	July 30, 2018	Email	The correspondent inquired about connection to the natural gas system.
7	August 16, 2018	Email	The correspondent inquired about future open houses.
8	September 4, 2018	Email	The correspondent inquired about employment opportunities.
9	September 6, 2018	Email	The correspondent inquired about project timing.
10	September 11, 2018	Email	The correspondent inquired about project timing.
11	September 17, 2018	Email	The correspondent inquired about employment opportunities.
12	September 27, 2018	Email	The correspondent inquired about project timing.
13	November 8, 2018	Email	The correspondent inquired about connection to the natural gas system.

Additionally, ENGLP has sponsored a number of public events in the region including:

- Paisley Blues Festival
- Lucknow Music in the Fields
- Lighthouse Blues Festival
- Kincardine Golf Tournament
- Kincardine Pride



Interrogatory 20:

Reference: Exhibit A, Tab 10, Schedule 1, pages 2

Preamble: *“The Stage 1 Archaeological Assessment determined that portions of the study area meet the criteria for archaeological potential and require further Stage 2 Archaeological Assessment. It is anticipated that the Stage 2 Archaeological Assessment will be limited to only the areas subject to potential construction disturbance, and the specific areas where a Stage 2 Archaeological Assessment is required will be determined once detailed engineering is completed. It is the intent of EPCOR to stay within the previously disturbed road allowance.”*

Questions:

- (a) Please provide an update on the Stage 2 Archaeological Assessment including any preliminary findings and the date by which it is anticipated to be fully completed.

Responses:

- (a) The Stage 2 Archaeological Assessment field work is scheduled to start on May 7th, 2019 (weather permitting). The final report is expected to be completed and submitted to the Saugeen Objiway Nation (SON) and the MTCS by June 1st 2019.



Interrogatory 21:

Reference: Exhibit A, Tab 1, Schedule 2, pages 2 to 6
Exhibit A, Tab 6, Schedule 1, page 1

Preamble: *“EPCOR applied for an order pursuant to section 90 of the OEB Act granting it leave to construct natural gas pipeline facilities in the Southern Bruce Municipalities. The OEB Act permits the OEB, when making an order, to “impose such conditions as it considers proper.”*

Questions:

- (a) OEB staff has prepared the following draft Conditions of Approval. If EPCOR does not agree to any of the draft conditions of approval noted below, please identify the specific conditions that Enbridge [sic] disagrees with and explain why. For conditions in respect of which EPCOR would like to recommend changes, please provide the proposed changes and an explanation of the changes.
- (b) The application requests a decision from the OEB by May 2019 and anticipates that the project will be completed by November 2021 or approximately 2.5 years later. In addition to the following draft Conditions of Approval, is EPCOR opposed to a condition that requires it to file a project update report with the OEB if the Project is not complete within three years of the date leave of the OEB is granted for the Project? The update report would be required to identify the lengths and locations of pipelines (including stations) constructed to date as well as those pipelines (including stations) that have yet to be constructed. The report would be required to provide a schedule for the completion of the outstanding works including the in-service dates of these works. The report would be required to provide an update on Project actual costs to date versus budget and include a revised total Project cost, if applicable. The OEB would use the report to conduct a review of the status of the Project and its LTC approval

Responses:

- (a) Further below is a blacklined version of the certain of the draft Conditions of Approval containing three proposed changes:
- The correction of a typo (the OEB’s docket number).



- The deletion of certain reporting requirements related (in Conditions 4 and 5) to project costs. ENGLP understands that inclusion of cost reporting is typical in LTC Conditions of Approval, and helpful to the OEB in order to monitor project costs and explain any cost variances between estimates filed with the LTC and actual capital costs projected to be included in rate base. However, as the OEB is aware, ENGLP is taking the financial risk on the capital cost of the project, based on its Common Infrastructure Plan (CIP) as filed in the competitive process in the South Bruce Expansion Applications. Any capital cost variances over the course of construction will have no impact on revenue requirement. Consequently, the typical capital cost reporting requirements will not yield useful or relevant information for the OEB for the purposes of rate-making in South Bruce.
- The addition of a material qualifier to the certification in Condition 6(a)(v). Given the size of the project, ENGLP believes that inadvertently omitting to obtain a minor approval should not render any senior executive certification false, or violative of the OEB's Conditions of Approval.

Blacklined Draft Conditions

1. EPCOR Natural Gas Limited Partnership (EPCOR) shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in EB-~~2019~~2018-0263 and these Conditions of Approval.

...

4. EPCOR shall advise the OEB of any proposed material change in the project, including but not limited to changes in: OEB-approved construction or restoration procedures, the proposed route, construction schedule ~~and cost~~, the necessary environmental assessment approvals, and all other approvals, permits, licences, certificates and rights required to construct the proposed facilities. Except in an emergency, EPCOR shall not make any such change without prior notice to and written approval of the OEB. In the event of an emergency, the OEB shall be informed immediately after the fact.

...

5. Concurrent with the final monitoring report referred to in Condition 6(b), EPCOR shall file a Post Construction Financial Report, which shall provide a variance analysis of project ~~cost~~, schedule or ~~and~~ scope ~~compared to the estimates filed in this~~



~~proceeding, including the extent to which the project contingency was utilized. EPCOR shall also file a copy of the Post Construction Financial Report in the proceeding where the actual capital costs of the project are proposed to be included in rate base or any proceeding where EPCOR proposes to start collecting revenues associated with the project, whichever is earlier.~~

...

6(a)(v) Provide a certification by a senior executive of the company, that the company has obtained all other material approvals, permits, licences, and certificates required to construct, operation and maintain the proposed project.

(b) ENGLP does not oppose providing a project update report, as set out in this information request, with the exception of the information noted in the second last sentence of the information request (i.e., the requirement “to provide an update on Project actual costs to date versus budget and include a revised total Project cost, if applicable.”) The rationale for eliminating the capital cost information from any project update report is the same as explained in ENGLP’s response to Staff-21(a) immediately above.



Interrogatory 1:

Reference: Exhibit A, Tab 9, Schedule 1, paras. 1, 3–5
“Proposed Natural Gas Pipeline to Serve Southern Bruce: Environmental Report”,
July 16, 2018

Preamble: *“Assessment of alternatives is a core principle of the Environmental Assessment Act, RSO 1990, c E.18 and most environmental assessment processes applicable to pipelines and pipeline project approvals. “Alternatives assessment” in Canada generally includes (i) evaluating impacts on Indigenous rights and interests and (ii) assessing impacts of construction and operation on environmental and cultural heritage features, prior to determining a preferred alternative.”*

Questions:

- (a) Please provide all evidence that EPCOR and/or its consultant(s) considered and developed — and the results of any and all — assessments of alternative routes, including, but not limited to, (i) evaluating impacts on Indigenous rights and interests and (ii) assessing impacts of route evaluation and selection, construction, and operation on environmental and cultural heritage features.

Responses:

- (a) The environmental study and route assessment included the following:
- Phase I: Inventory and mapping of existing conditions; identification of route options.
 - Phase II: Identification of a preliminary preferred route.
 - Phase III: Confirmation of the route and preparation of this environmental report (ER).

During the process of developing the environmental study and leave to construct application, EPCOR Natural Gas Limited Partnership (“ENGLP” as it is referred to in the application) and its consultants met with Indigenous rights holders to discuss route options and potential impacts to Indigenous rights and interests. Feedback received from Indigenous rights holders did not result in any routing changes. However, feedback was received from the Saugeen Ojibway Nation that resulted in an updated Archaeological Assessment for the Project.



Interrogatory 2:

Reference: Exhibit A, Tab 9, Schedule 1, paras. 1, 3–5

“Proposed Natural Gas Pipeline to Serve Southern Bruce: Environmental Report”,
July 16, 2018

Preamble: *“Indigenous governments commonly provide proponents of infrastructure and resource development projects with principles and procedures for conducting consultation and accommodation, and similar guidance for archaeological assessment processes on their traditional territories.”*

Questions:

- (a) Please provide all information on or related to EPCOR’s consideration and implementation of the Principles for Proponents working in the Traditional Territories of the Saugeen Ojibway Nation (SON).
- (b) Please provide all information on or related to EPCOR’s consideration and implementation of SON’s Process and Standards for Approval Authorities, Development Proponents and Consultant Archaeologists for Conducting Archaeology within the Traditional Territory of the SON.

Responses:

- (a) When engaging the SON, ENGLP considered and implemented the Principles for Proponents as identified and outlined by the SON. ENGLP met with the SON and the principles were reviewed and discussed. In discussions to date, the SON has not indicated any outstanding issues with respect to the consideration and implementation of the Principles for Proponents.
- (b) When engaging the SON, ENGLP considered and implemented the Process and Standards for Approval Authorities, Development Proponents and Consultant Archaeologists for Conducting Archaeology within the Traditional Territory of the SON. ENGLP met with the SON and the process and standards were reviewed and discussed. In discussions to date, the SON has not indicated any outstanding issues with respect to the consideration and implementation of SON’s Process and Standards for Approval Authorities, Development Proponents and Consultant Archaeologists for Conducting Archaeology within the Traditional Territory of the SON.



Interrogatory 3:

Reference: Exhibit A, Tab 3, Schedules 1 and 7
Exhibit A, Tab 11, Schedule 1

Preamble: *“The majority of First Nations in Ontario do not have access to natural gas, and many First Nations are interested in accessing natural gas for energy cost savings and low-emission heating. The recently enacted Access to Natural Gas Act, 2018, SO 2018, c 15 (Bill 32) provides a framework for regulations to deliver rate protection for consumers or prescribed classes of consumers with respect to costs incurred by natural gas distributors in making a qualifying investment for the purpose of providing access to a natural gas distribution system to those consumers by reducing the rates that would otherwise apply in accordance with the prescribed rules.”*

Questions:

- (a) What impacts will EPCOR’s project have on the provision of natural gas to SON reserve communities and off-reserve members in the region?
- (b) What impacts will EPCOR’s project have on the cost of natural gas to SON reserve communities and off-reserve members in the region?

Responses:

- (a) SON’s reserve communities are not within the areas to be served by the current Southern Bruce Project. Off-reserve members that live or have businesses within the project area will have the potential to access natural gas services from ENGLP in the same manner as all other residents and businesses.
- (b) As there is no existing distribution system in the area ENGLP is planning to serve, there is no existing price for natural gas in the reserve communities or for off-reserve members in that area.



Interrogatory 4:

Reference: Exhibit A, Tab 11, Schedule 1
Exhibit A, Tab 11, Schedule 2

Questions:

- (a) Please describe and provide evidence for how EPCOR determined, interpreted, and applied:
- i. its procedural requirements;
 - ii. the Crown's procedural requirements; and
 - iii. the Ontario Energy Board's procedural requirements;

in assisting the Crown in fulfilling its duty to consult and accommodate the SON, with all supporting evidence

Responses:

- (a) See response to Anwaatin Interrogatory 6.



Interrogatory 5:

Reference: Exhibit A, Tab 11, Schedule 1
Exhibit A, Tab 11, Schedule 2

Questions:

- (a) Has EPCOR made plans to or considered entering into a franchise agreement (or similar) with SON with respect to:
- i. SON's treaty rights; and
 - ii. SON's Bruce Peninsula Land Claim, which names, as defendants, the municipalities of South Bruce Peninsula, Northern Bruce Peninsula, Saugeen Shores, Georgian Bluffs and the counties of Bruce and Grey (as well as the federal and provincial governments)?

Responses:

- (a)
- i. No.
 - ii. No.



Interrogatory 6:

Reference: Exhibit A, Tab 11, Schedule 1, paras 10–17
Exhibit A, Tab 11, Schedule 2

Preamble: *“On April 19, 2017, EPCOR received correspondence from the Ministry of Energy, Northern Development and Mines (then the Ministry of Energy) (the Ministry) that the duty to consult had been delegated to EPCOR. There was further correspondence between the Ministry and EPCOR on June 20, 2018”*

Questions:

- (a) Please describe and provide copies of any and all communications and responses between EPCOR and the Ministry with respect to the delegated duty to consult and accommodate First Nations and Métis communities.
- (b) Please indicate whether the Ministry has communicated to EPCOR in respect of whether it is satisfied that Indigenous consultation and accommodation related to the application is sufficient.

Responses:

- (a) ENGLP seeks to foster positive and productive relationships with all Indigenous rights-holder groups including First Nations and Métis communities. ENGLP views First Nations and Métis communities as an integral part of the communities in which ENGLP operates. ENGLP works with First Nations and Métis communities to build an understanding of project related interests, ensure regulatory requirements are met, mitigate or avoid project impacts, and provide mutually beneficial opportunities.

On April 19, 2017, ENGLP received correspondence from the Ministry of Environment, representing the Crown, that the duty to consult had been delegated to ENGLP. The following First Nations and Métis communities were included in the MOE’s delegation letter:

- Saugeen First Nation
- Chippewas of Nawash Unceded First Nation
- Métis Nation of Ontario - Great Lakes Traditional Territory Consultation Council
- Historic Saugeen Métis



In the MOE's letter to ENGLP clarifying the duty to consult requirements, the Great Lakes Traditional Territory Consultation Council was identified as an additional community that may have an interest in the Project based on Treaty rights. The Métis Nation of Ontario (MNO) also requested that the Georgian Bay Traditional Territory Consultation Committee (GBTTC) be consulted. The MOE clarified on June 20, 2018 that they would defer to the recommendation of the MNO and that consultation via the MNO with the GBTTC would suffice.

First Nation and Métis community consultation has been conducted through phone calls, in-person meetings, mail-outs, open houses and email communications. During these engagement activities, ENGLP representatives have provided an overview of the Project, responded to questions and interests, and reviewed input and concerns expressed by First Nations and Métis communities including the SON representing the Saugeen First Nation and the Chippewas of Nawash Unceded First Nation.

ENGLP has retained Stantec Consulting Ltd. (Stantec) to undertake an environmental study of the construction and operation of the natural gas pipeline which meets the intent of the Ontario Energy Board's (OEB) *Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and facilities in Ontario, 7th Edition* (2016). This report was provided to all identified First Nations and Métis communities included in the MOE's delegation letter and feedback was collected from the First Nations and Métis communities as outlined in Exhibit A, Tab 11, Schedule 1 of the leave to construct application.

ENGLP will continue to engage with all identified First Nations and Métis communities in open and transparent dialogue concerning the Project. ENGLP will continue to offer meaningful opportunities for the exchange of information, responding to inquiries, and hearing and responding to any interests and concerns that may arise, including those related to potential economic and business opportunities.

- (b) On May 1, 2019, ENGLP received the letter regarding the sufficiency of ENGLP's activities with respect to the duty to consult from the MENDM. A copy of this letter can be found in the response to OEB Interrogatory 14.



Interrogatory 1:

Reference: Exhibit 1 Tab 1 Schedule 1 Page 5 of 63

Preamble: *“In the Southern Bruce Expansion Decision, the Board granted ESBGI Certificates of Public Convenience and Necessity (“CPCN”) for each of the Municipality of Arran- Elderslie (except for the geographic area of the former Township of Arran and the former Village of Tara), the Municipality of Kincardine and the Township of Huron-Kinloss, conditional on the approval of its subsequent leave to construct application.”*

Reference: Exhibit A, Tab 2, Schedule 1, page 3

Preamble: *“In order to allow EPCOR to construct the Facilities to serve the Southern Bruce Municipalities, EPCOR also applies under section 8 of the MF Act for limited CPCNs along the mainline route in respect of the County of Bruce, the County of Grey, the Municipality of Brockton, the Municipality of West Grey and the Township of Chatsworth.”*

Reference: Exhibit A, Tab 4, Schedule 1, page 3

Preamble: *“For Grey County, EPCOR is seeking an upper-tier CPCN limited to a strip 500 meters to the north and south of the preferred pipeline route. Within Grey County, EPCOR is also seeking limited CPCNs for the Municipality of West Grey and the Township of Chatsworth, in each case a 500 meter-wide strip to the south and north (respectively) of the preferred pipeline route. For Bruce County, EPCOR is seeking an upper tier CPCN covering the areas for which EPCOR already has lower-tier CPCNs (i.e. the Municipality of Arran- Elderslie, the Municipality of Kincardine, and the Township of Huron- Kinloss), along with a narrow strip (500 meters to the north and south, as applicable, of the preferred pipeline route) in the Municipality of Brockton. Within Bruce County, EPCOR is seeking a limited CPCN for the Municipality of Brockton, namely a 500 meter-wide strip to the south and north (as applicable) of the preferred pipeline route.”*



Questions:

- (a) Please provide metes and bounds information in lots and concessions for those parts of the Municipality of Arran-Elderslie, the Municipality of Kincardine and the Township of Huron- Kinloss that are associated with this leave to construct application.
- (b) Please provide metes and bounds information in lots and concessions for those parts of the Municipality of Brockton, the Municipality of West Grey and the Township of Chatsworth that are associated with this leave to construct application.
- (c) Please provide metes and bounds information in lots and concessions for those parts of the lower-tier municipalities within the County of Bruce and the County of Grey that are associated with this leave to construct application and not already addressed in other proposed CPCNs

Responses:

- (a) As noted in EPCOR Natural Gas Limited Partnership (referred to as ENGLP in its application) application, ENGLP has been granted conditional Certificates of Public Convenience and Necessity (each a “CPCN”) for the Municipality of Arran-Elderslie (excepting the areas represented by the former municipalities of Arran and Tara), Kincardine and Huron-Kinloss. Specifying the exact metes and bounds for certain parts of these municipalities is not necessary for the OEB to render its decision regarding ENGLP’s application, and is therefore not relevant to this proceeding.
- (b) As noted in ENGLP’s application, ENGLP has specified that a CPCN is required to cover the areas along a narrow, 500-metre (to the north and south) strip along the pipeline’s preferred route, and in ENGLP’s view, the specified 500-metre strip, along with the maps included in ENGLP’s application, provide more than enough specificity and detail for the OEB to grant the narrow CPCNs requested by ENGLP. In the event that the OEB requires greater specificity or detail, or requires modifications to the pipeline route, ENGLP would be pleased to provide the OEB with information the OEB needs to issue such CPCNs.
- (c) ENGLP is not aware of any other lower-tier municipalities within the County of Bruce and the County of Grey that are not addressed in the proposed CPCNs



Interrogatory 2:

Reference: Exhibit A, Tab 2, Schedule 1, page 3

Preamble: *“Pending Board approval, EPCOR will enter into franchise agreements with the County of Bruce, the County of Grey, the Municipality of Arran-Elderslie, the Municipality of Brockton, the Municipality of Kincardine, the Municipality of West Grey, the Township of Chatsworth and the Township of Huron-Kinloss. All proposed franchise agreements are based on the Board’s Model Franchise Agreement. The Franchise Agreements with the County of Bruce, the Municipality of Arran-Elderslie, the Municipality of Kincardine, the Municipality of West Grey, the Township of Chatsworth and the Township of Huron-Kinloss have been executed and are attached at Tab 4, Schedule 4. The Franchise Agreements for Grey County and the Municipality of Brockton have been approved and will be executed pending Board approval; the forms of agreement are attached at Tab 4, Schedule 4.”*

Question:

- (a) Please confirm EPCOR’s understanding that the effective date of any franchise agreement will be the later of the date of the Decision and Order issued by the Ontario Energy Board approving a franchise agreement or the date of the 3rd and Final reading of the municipal bylaw approving the franchise agreement.

Response:

- (a) ENGLP’s view is that the applicable effective date of any franchise agreement depends on the directions provided, if any, by the OEB in the Decision and Order approving the terms of such franchise agreement. In this case, ENGLP believes it would be convenient to have all franchise agreements related to the South Bruce project effective on the same date, but in any event respectfully requests that in its Decision and Order in this proceeding, the OEB indicate whether the effective date of a franchise agreement is the date of the applicable order, the date of the final reading of the applicable by-law, or another date that the OEB determines appropriate.



Interrogatory 3:

Reference: Exhibit A, Tab 3, Schedule 1, page 7

Preamble: *“Subject to OEB approval, construction is scheduled to begin in June 2019. This will allow sufficient time to construct the Project over three summer construction seasons and avoid higher winter construction costs. This construction schedule has been updated from EPCOR’s CIP submission to take into account the impact of the delay in approval of a Leave to Construct for the Project which was originally assumed to be August 2018. EPCOR is targeting substantial completion of the Project by December 31, 2021.*

The proposed construction schedule is targeted to begin in June 2019, with natural gas being distributed to Bruce Energy Centre, Chesley and Paisley for the 2019-2020 heating season if Union completes the custody transfer station in November 2019 as originally targeted. Natural gas is expected to be available in Kincardine and Tiverton for the 2020-2021 heating season, and Lucknow, Inverhuron, Point Clark and Lurgan Beach for the 2021-2022 heating season.”

Reference: Exhibit A, Tab 6, Schedule 1, page 1

Preamble: *“The proposed construction schedule will start to provide natural gas to residences, business and industrial customers for the 2019-2020 heating season. EPCOR must commence construction by June 2019 to meet the in service date and avoid winter construction. Therefore, EPCOR is requesting that the Board issues a decision for this proceeding by the end of May 2019.”*

Questions:

- (a) Please provide an update on the expected in-service dates of the various components of the project.
- (b) Please provide an update to Table 2 - CIP Customer Forecast (Exhibit A, Tab 7, Schedule 1, page 6) showing details of current estimates of how many of each class of customer (residential, commercial and industrial) EPCOR plans to serve for the 2019-2020 and subsequent heating seasons.
- (c) Please provide an update to Table 3 - CIP Throughput Volumes (Exhibit A, Tab 7, Schedule 1, page 7) showing details of current throughput estimates



- (d) Please provide an update on the costs forecast for this project since the CIP review process.
- (e) What are the scheduling impacts if final approvals of the requested leave to construct, proposed franchise agreements and CPCNs are not received by May 31, 2019 or June 30, 2019?
- (f) Please confirm that no construction activities have been commenced and will not commence until the CPCNs have been approved by the OEB and final franchise agreements have been executed by the municipalities

Response:

- (a) Please see ENGLP's response to OEB Interrogatory 1a).
- (b) Below is an updated forecast of customer connections.

Table Enbridge 3 - 1: Current Customer Estimate

Customer Type	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	Cumulative
Existing Residential	0	1,149	3,237	3,742	4,176	4,349	4,349	4,349	4,349	4,349	34,049
New Residential	0	52	159	215	271	328	384	424	462	469	2,764
<i>Sub Total</i>	0	1,200	3,396	3,957	4,447	4,677	4,733	4,773	4,811	4,818	36,812
Small Commercial	0	72	215	288	343	359	359	359	359	359	2,713
Medium Commercial	0	14	43	59	67	69	69	69	69	69	528
Large Commercial	0	4	13	16	17	19	19	19	19	19	145
<i>Sub Total</i>	0	89	271	363	427	447	447	447	447	447	3,385
Small Agricultural	0	0	0	1	2	2	2	2	2	2	13
Industrial and Large Agricultural	2	3	9	11	11	11	11	11	11	11	91
<i>Sub Total</i>	2	3	9	12	13	13	13	13	13	13	104
Grand Total	2	1,292	3,676	4,332	4,887	5,137	5,193	5,233	5,271	5,278	40,301



(c) Below is an updated forecast of throughput volumes:

Table Enbridge 3 - 2: Current Throughput Estimates (m³)

Customer Type	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	Cumulative
Existing Residential	0	1,231,101	4,717,417	7,498,936	8,507,891	9,160,113	9,346,001	9,346,001	9,346,001	9,346,001	68,499,462
New Residential	0	55,842	214,714	386,342	502,038	618,767	735,496	834,664	915,238	961,723	5,224,824
<i>Sub Total</i>	0	1,286,943	4,932,131	7,885,278	9,009,929	9,778,880	10,081,497	10,180,665	10,261,239	10,307,724	73,724,286
Small Commercial	0	169,414	668,304	1,180,290	1,480,642	1,647,243	1,684,787	1,684,787	1,684,787	1,684,787	11,885,041
Medium Commercial	0	181,658	765,274	1,373,583	1,696,779	1,831,444	1,858,377	1,858,377	1,858,377	1,858,377	13,282,245
Large Commercial	0	137,967	614,432	1,097,433	1,248,803	1,362,330	1,438,015	1,438,015	1,438,015	1,438,015	10,213,025
<i>Sub Total</i>	0	489,039	2,048,009	3,651,306	4,426,224	4,841,017	4,981,179	4,981,179	4,981,179	4,981,179	35,380,312
Small Agricultural	0	0	0	2,360	7,080	9,440	9,440	9,440	9,440	9,440	56,640
Industrial and Large Agricultural	649,102	23,498,573	24,107,247	24,798,991	24,985,073	24,985,073	25,028,741	25,002,523	24,985,073	24,985,073	223,025,469
<i>Sub Total</i>	649,102	23,498,573	24,107,247	24,801,351	24,992,153	24,994,513	25,038,181	25,011,963	24,994,513	24,994,513	223,082,109
Grand Total	649,102	25,274,555	31,087,387	36,337,935	38,428,306	39,614,410	40,100,857	40,173,807	40,236,931	40,283,416	332,186,706

(d) Please see ENGLP's response to OEB Interrogatory 7 d).

(e) Please see response to OEB Interrogatory 5 c).

(f) ENGLP confirms that no construction activities have commenced and it will ensure that material permits and approvals that are required will be obtained in advance of construction activities.



Interrogatory 4:

Reference: EPCOR Application, Exhibit A, Tab 4, Schedule 4
Proposed Franchise Agreements

Preamble: *“4. Duration of Agreement and Renewal Procedures.*
(a) If the Corporation has not previously received gas distribution services, the rights hereby given and granted shall be for a term of 20 years from the date of final passing of the By- law.

(b) At any time within two years prior to the expiration of this Agreement, either party may give notice to the other that it desires to enter into negotiations for a renewed franchise upon such terms and conditions as may be agreed upon. Until such renewal has been settled, the terms and conditions of this Agreement shall continue, notwithstanding the expiration of this Agreement. This shall not preclude either party from applying to the Ontario Energy Board for a renewal of the Agreement pursuant to section 10 of the Municipal Franchises Act.”

Reference: OEB’s 2000 Model Franchise Agreement:

Preamble: *“4. Duration of Agreement and Renewal Procedures*

(a) If the Corporation has not previously received gas distribution services, the rights hereby given and granted shall be for a term of 20 years from the date of final passing of the By- law.

or

(b) If the Corporation has previously received gas distribution services, the rights hereby given and granted shall be for a term of 20 years from the date of final passing of the By-law provided that, if during the 20 year term of this Agreement, the Model Franchise Agreement is changed, then on the 7th anniversary and on the 14th anniversary of the date of the passing of the Bylaw, this Agreement shall be deemed to be amended to incorporate any changes in the Model Franchise Agreement in effect on such anniversary dates. Such deemed amendments shall not apply to alter the 20 year term.



(c) *At any time within two years prior to the expiration of this Agreement, either party may give notice to the other that it desires to enter into negotiations for a renewed franchise upon such terms and conditions as may be agreed upon. Until such renewal has been settled, the terms and conditions of this Agreement shall continue, notwithstanding the expiration of this Agreement. This shall not preclude either party from applying to the Ontario Energy Board for a renewal of the Agreement pursuant to section 10 of the Municipal Franchises Act.”*

Questions:

- (a) Please confirm EPCOR’s understanding that Enbridge Gas (previously Union Gas Limited) has been distributing gas within the following municipalities:
- Municipality of Arran-Elderslie (since 1997)
 - Municipality of Brockton (since 1962)
 - Township of Chatsworth (since 1962)
 - Municipality of West Grey (since 1962)
 - County of Bruce (since 1962)
 - County of Grey (since 1959)
- (b) Please confirm EPCOR’s understanding that Enbridge Gas currently holds franchise agreements with and Certificates of Public Convenience and Necessity for each of the municipalities identified in part (a).
- (c) Given that consumers within these municipalities have been receiving gas distribution services for several decades, please confirm that clause 4 of the proposed franchise agreements for these municipalities should refer to sub-clause (b) of the 2000 Model Franchise Agreement.

Response:

- (a) ENGLP is generally aware that Enbridge Gas may have some infrastructure within the Municipality of Arran-Elderslie, specifically the former Township of Arran and the former Village of Tara. However, ENGLP has not independently verified whether or not this is the case. Regardless, as Enbridge is aware, ENGLP was issued a CPCN for the Municipality of Arran-Elderslie that excludes the former Township of Arran and the former Village of Tara. ENGLP has no knowledge of Enbridge Gas’ distribution of gas in the Township of Chatsworth, the Municipality of West Grey, and more generally the County of Bruce and the County of Grey. It is ENGLP’s position that the OEB has already decided on matters of geographic territory between Enbridge Gas and ENGLP,



both in the Generic Proceeding on System Expansion and in the decision to award the South Bruce expansion to ENGLP.

- (b) ENGLP has not independently verified whether or not Enbridge Gas has franchise agreements and CPCNs with the above municipalities, and it is ENGLP's position that these issues have already been decided by the OEB and it is not relevant for the purposes of this application.
- (c) It is ENGLP's position that its proposed franchise agreements are effectively "greenfield" projects such that the option of 4(b) in the OEB's Model Franchise Agreement is not necessary or appropriate. However, if the OEB determines that 4(b) is required and appropriate, then ENGLP will modify its proposed franchise agreements accordingly.



Interrogatory 5:

Reference: EB-2016-0137/0138/0139 Decision and Order dated April 12, 2018, page 12, “4.3 Municipal Franchise Agreements”

Preamble: *“The original applications filed by EPCOR on March 24, 2016 also requested that the OEB approve the terms of their franchise agreements with the South Bruce Municipalities. The form of the franchise agreements filed differs from the 2000 Model Franchise Agreement (MFA) in the following ways:*

- *The proposed franchise agreements contain termination provisions. If EPCOR fails to meet certain milestones dates at various points throughout the regulatory applications and construction, the municipalities have termination rights. The rationale was to ensure that EPCOR is actively pursuing this undertaking in a timely manner.*
- *The proposed franchise agreements provide for the payment of an annual fee by EPCOR to the municipalities following the commencement of operation of the gas system. The annual fee is 1% of gross revenue minus gas supply commodity costs.*
- *The proposed franchise agreements provide for a rebate of the Municipality’s portion of any property or similar taxes payable by EPCOR for the first 10 years of operation.*
- *The proposed franchise agreements provide for the assignment of the agreements to a wholly or majority owned subsidiary of EPCOR.”*

Questions:

- (a) Has EPCOR entered into any side agreements / arrangements with the Southern Bruce Municipalities?
- (b) If the answer to (a) is yes, please provide documentation related to these agreements / arrangements.

Response:

- (a) ENGLP has no agreements or arrangements with the Southern Bruce Municipalities.
- (b) Not applicable.



Interrogatory 6:

Reference: EPCOR Application, Exhibit A, Tab 7, Schedule 1, page 4

Preamble: *“In confirming the economic viability of this project EPCOR is relying on determinations made by the OEB in its Southern Bruce Expansion Decision with respect to an EBO 188 based economic test which is applied to a distribution system expansion.”*

Reference: EPCOR Application, Exhibit A, Tab 7, Schedule 1, page 5

Preamble: *“EPCOR proposes that the CIP process, the parameters contemplated therein and the Southern Bruce Expansion Decision have addressed the economic feasibility requirement. The circumstances of this Application are unique in that it is the result of the Southern Bruce Expansion Decision. As a new stand-alone franchise with stand-alone rates, there are no existing customers that will be affected by development of the system, and no cross-subsidization will occur with any other Ontario system, including EPCOR’s Aylmer operations.”*

Reference: EPCOR Application, Exhibit A, Tab 7, Schedule 1, page 3

Preamble: *“On December 21, 2018 EPCOR received a letter from the Minister of Energy, Northern Development and Mines stating that the South Bruce expansion project will be eligible to receive rate protection associated with Bill 32, Access to Natural Gas Act, 2018.”*

Questions:

- (a) Was a discounted cash flow analysis in accordance with the parameters laid out in EBO 188 completed for the proposed project? If yes, please provide this analysis.
- (b) Please explain EPCOR’s position that the rate protection associated with Bill 32 will not result in any cross-subsidization with any other Ontario gas distribution system.

Response:

- (a) No.
- (b) The intent of ENGLP’s statement was to confirm that South Bruce will use stand-alone rates as agreed to during the OEB’s competitive process (EB-2016-0137/0138/0139).



Interrogatory 7:

Reference: EPCOR Application, Exhibit A, Tab 7, Schedule 1, page 5

Preamble: *“EPCOR has undertaken consultations with potential customers in the area and is proposing rates with an objective of being competitive so as to encourage conversion. As part of the Board’s competitive CIP process, EPCOR is required to take additional risks not common to other utilities including market risk during the rate stability period. Moreover, EPCOR accepts the capital cost risk associated with construction of the facilities contemplated within the framework of the CIP, further ensuring that no customers in either system will have exposure to capital cost overruns from the development of the distribution system.”*

Questions:

- (a) Please provide details of the additional risks that EPCOR is required to take that are not common to other utilities.
- (b) Please describe the provisions in EPCOR’s proposed rate design that are intended to make EPCOR’s service competitive and to encourage conversion.

Response:

- (a) Please see ENGLP’s response to OEB Interrogatory 1(a).
- (b) The provisions in ENGLP’s proposed rate design that are intended to make its service competitive and encourage conversion are properly addressed in ENGLP’s rate application (EB-2018-0264) and outside the scope of this Leave to Construct application.



Interrogatory 1:

Reference: ExA/T3/S1/p4, para. 13.

Preamble: *“The evidence indicates that contractual discussions with industrial customers in the service area are expected to conclude prior to construction start.”*

Questions:

- (a) Have such contractual discussions concluded?
- (b) Have contracts been executed?
- (c) If contracts have not been executed, do these contracts have to be executed prior to construction?
- (d) If discussions have not concluded, please provide a general indication of the outstanding issues in these discussions. Are there outstanding issues related to project costs or other costs to serve and/or anticipated recovery of such costs in EPCOR’s rates?
- (e) Would the inability to conclude any of the anticipated contracts lead to the cancellation or material alteration of the project? If so, please provide further explanation of the risks to, and potential impacts on, the project.
- (f) Is future ratemaking an issue in any of these discussions? If so;
 - (i) Please describe the issue(s) and the prognosis for resolution of the issue(s).
 - (ii) Please provide a general description of EPCOR’s anticipated approach to setting rates for its new service territory, including whether EPCOR anticipates having more than one rate zone (given the multi-part/multi-stage system proposed).

Responses:

- (a) No.
- (b) No.
- (c) ENGLP is targeting to execute these contracts prior to construction.
- (d) Outstanding issues include those related to terms of service including rates. ENGLP notes that, within the set of common parameters, project costs have been established in EB-2016-0137/0138/0139.
- (e) ENGLP anticipates reaching agreements with the potential industrial customers. As detailed in OEB Interrogatory 1a), ENGLP is assuming certain risks on project viability.
- (f) Future rate making is an issue in discussions.
 - (i) ENGLP has to recover the cumulative revenue requirement as approved in EB-2016-0138-7/0138/0139. ENGLP anticipates that this issue will be resolved.
 - (ii) ENGLP’s proposed approach to setting rates is thoroughly addressed in its rates application (EB-2018-0264). ENGLP is proposing one rate zone.



Interrogatory 2:

Reference: ExA/T3/S1/p7, para. 22.

Preamble: *“The evidence indicates that the construction time line for the project has been altered from the 2 year schedule in the Common Infrastructure Plan (CIP) presented by EPCOR in EB-2016-0137/0138/0139 (see page 21, paragraph 15 and page 37) and now contemplates construction over 3 summers, to take into account the impact of the current Leave to Construct approval time-frame expectations.”*

Questions:

- (a) Has the extended construction schedule increased project costs?
- (b) If so;
 - (i) Please indicate by how much (in both dollar and percentage terms)?
 - (ii) Please confirm that these increased costs will not have an impact on the rates which EPCOR put forward in its CIP and which it has committed to for the Rate Stability Period, or on the capital cost to be included in rates to be set following conclusion of the Rate Stability Period.
 - (iii) How does EPCOR propose to manage these increased costs?
 - (iv) Have any material aspects of the project’s specifications or construction plan been modified in reaction to the extended schedule in order to mitigate these increased costs?

Responses:

- (a) Please see ENGLP’s response to OEB Interrogatory 11.
 - (i) Please see ENGLP’s response to OEB Interrogatory 11.
 - (ii) Please see ENGLP’s response to OEB Interrogatory 11.
 - (iii) Please see ENGLP’s response to OEB Interrogatory 11.
 - (iv) No material aspects of the project’s specifications have been modified as a result of the extended schedule. The construction plan has been modified as per the construction schedule as included in ENGLP’s response to OEB Interrogatory 1a) in order to mitigate costs.



Interrogatory 3:

Reference: ExA/T7/S1/p2.

Preamble: *"The evidence provides the project costs and key metrics and revenue requirements, which formed the basis for EPCOR's CIP."*

Reference: ExA/T7/pp3-4.

Preamble: *"The evidence addresses the Rate Stability Period and states: Commitments made during the rate stability period transfers [sic] risk relating to the Project and potential revenues to EPCOR if customer attachments do not occur as forecast."*

Reference: ExA/T8/S1/p1, para. 3.

Preamble: *"The evidence states;*
(i) *EPCOR's understanding that Union Gas will file an LTC application with the Board to seek approval to construct its interconnection facilities at Dornoch.*
(ii) *EPCOR will enter into a firm upstream Transportation Agreement approved by the OEB.*
(iii) *EPCOR will submit a gas supply plan with its rate application [EB-2018-0264] which will include storage assets.*
In (then) Union Gas' Application for approval of its proposed M17 Rate to provide EPCOR with service [EB-2018-0244], issues arose as to;
(i) *the allocation (as between EPCOR and existing Union Gas customers) of the costs of upstream reinforcement to serve EPCOR; and*
(ii) *the availability to EPCOR of cost based storage services from Union Gas.*
To the best of IGUA's knowledge these issues remain unresolved.
We understand that gas supply and other upstream costs were excluded from the competing CIPs submitted by EPCOR and Union Gas in EB-2016-0137/0138/0139, and we therefore assume that the costs associated with any such upstream reinforcement or market based storage requirements were not included in the rate commitment made by EPCOR in its CIP.'

Questions:

- (b) Please confirm whether our understanding, as recited immediately above, is correct, and if not please provide correction as warranted.
- (c) Please indicate to what extent EPCOR's attachments and volume forecasts are sensitive to these upstream reinforcement and storage costs.



- (d) If our understanding is correct, and if material additional upstream reinforcement and/or storage costs materialize, will EPCOR seek a change to its Rate Stability Period rate commitment?
- (e) Please confirm that Enbridge Gas (EG) has held a reverse open season related to the potential reinforcement. Is EPCOR aware of the results of that reverse open season? If so, please provide any details of which EPCOR is aware.
- (f) Based on EPCOR's most current information, when does EPCOR anticipate that an upstream reinforcement by EG will be required to be in service in order to match EPCOR's customer attachment and volume forecasts?
- (g) Please provide any update of which EPCOR is aware regarding the EG applications relevant to EPCOR's project:
 - (i) Dornoch connection LTC application.
 - (ii) Upstream reinforcement LTC application.
 - (iii) Rate M17 application.

Responses:

- (b) The understanding is correct, subject to update that it is ENGLP's understanding that the transfer station to be built at Dornoch does not require a leave to construction application.
- (c) ENGLP has not undertaken a study to confirm to what extent its attachments and volume forecasts are sensitive to upstream reinforcement and storage costs.
- (d) ENGLP is not proposing a change to its Rate Stability Period rate commitment if any potential increase in upstream reinforcement and/or storage costs materialize.
- (e) ENGLP is not aware if Enbridge Gas has held a reverse open season related to the potential reinforcement.
- (f) Enbridge Gas has informed ENGLP that it can provide the necessary gas until 2020.
- (g)
 - (i) ENGLP understands that Enbridge Gas will not be filing a LTC for the Dornoch connection. Please see ENGLP's response to OEB Interrogatory 5a) for details as to status.
 - (ii) ENGLP understands that Enbridge may file its LTC application by June of this year, subject to Enbridge and ENGLP entering into a number of agreements in advance of it filing the LTC, primarily being a Financial Backstopping Agreement, Precedent Agreement and Transportation Services Agreement. The parties are currently negotiating the terms and conditions of those agreements.
 - (iii) On February 13, 2019, Enbridge filed a request with the OEB to withdraw its M17 application (EB-2018-0244) indicating that it would address its request for M17 Transportation Service as part of a leave to construct application for the upstream reinforcement of the Owen Sound Line. On February 25, 2019, ENGLP filed correspondence with the OEB opposing such withdrawal. On March 21, 2019, ENGLP met with Enbridge to discuss the M17 rate application. The parties have agreed to continue discussions around the M17 service and its applicability.



Interrogatory 4:

Reference: ExA/T7/S1/p2.

Preamble: *“The evidence provides the project costs and key metrics and revenue requirements, which formed the basis for EPCOR’s CIP.”*

Reference: ExA/T7/pp3-4.

Preamble: *“The evidence addresses the Rate Stability Period and states: Commitments made during the rate stability period transfers risk relating to the Project and potential revenues to EPCOR if customer attachments do not occur as forecast.”*

Reference: ExA/T7/S1/p5, para. 13.

Preamble: The evidence states: *As part of the Board’s competitive CIP process, EPCOR is required to take additional risks not common to other utilities including market risk during the rate stability period.* [Emphasis added.]

Questions:

- (a) Please clarify whether EPCOR anticipates that its Rate Stability Period rates would be subject to adjustments for inflation and OEB prescribed cost of capital parameters.
- (b) Please confirm that EPCOR’s intention is to allocate the \$22 million in available provincial gas expansion funding reflected in project costs across its entire customer base (i.e. as an offset to overall project costs and resulting revenue requirement).
- (c) Please confirm following conclusion of the Rate Stability Period the risk of lower customer attachments and/or lower volumes than forecast shift back to ratepayers.

Responses:

- (a) ENGLP’s rate application (EB-2018-0264) addresses issues regarding the rate stability period.
- (b) See (a) above. ENGLP can confirm that it is proposing to allocate the \$22.0 million in funding against capital costs that service its entire customer base.
- (c) ENGLP will file a rate case to address rates following the 10-year rate stability period. It is expected that the utility will transition to traditional cost of service rates at that time.



Interrogatory 5:

Reference: EB-2016-0137/0138/0139 CIP Submission, page 39, paragraph 24. The CIP Submission indicates that collaboration opportunities discussed in the CIP would, if firmed up and yielding operational efficiencies, form part of the LTC.

Question: Please provide an update on the collaboration opportunities discussed in the CIP and their impact, if any, on the LTC application.

Responses:

(a) Please see ENGLP's response to OEB Interrogatory 7(h).