



Stephanie Allman
Regulatory Coordinator

tel 416-495-5499
EGIRegulatoryProceedings@enbridge.com

Enbridge Gas Inc.
500 Consumers Road
North York, Ontario M2J 1P8
Canada

August 9, 2019

VIA EMAIL and COURIER

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

Dear Ms. Walli:

Re: Enbridge Gas Inc. ("Enbridge Gas")
Ontario Energy Board File: EB-2019-0006
St. Laurent Pipeline Project – Interrogatory Responses

In accordance with Procedural Order No.1, dated July 22, 2019, enclosed please find Interrogatory Responses of Enbridge Gas.

Please contact the undersigned if you have any questions.

Yours truly,

(Original Signed)

Stephanie Allman
Regulatory Coordinator

ENBRIDGE GAS INC.
Answer to Interrogatory from
Board Staff (STAFF)

Reference: Application, Exhibit D, Tab 2, Schedule 1: Estimated Project Cost, page 1, paragraphs 1 and 3

Preamble:

The estimated project cost is \$4.2 million in direct capital costs and \$1.3 in indirect overhead costs. Enbridge Gas stated that the total project cost is estimated to be \$ 5.5 million and that indirect overhead costs have been included pursuant to Enbridge Gas' capitalization policy.

Questions:

- a) Please summarize Enbridge Gas' capitalization policy and explain the rationale for this approach.
- b) Are the cost components that are included in the cost estimate of the project in this application expected to be the same as that would be included in any possible ICM funding request for this project? If not, please identify the cost components that have been excluded in this application and provide a rationale for their exclusion.

Response

- a) Enbridge Gas follows the Enbridge Harmonized Enterprise-wide Capitalization Policy that establishes guidelines and procedure for the capitalization of costs. Expenditures that are incurred in one period, but are anticipated to result in economic benefits over a number of years in the future are capitalized. In the EGD rate zone, the overhead capitalization process involves four cost components for overheads:
 - i. Administrative & General Overheads ("A&G") – A&G are costs that support the delivery of capital projects but cannot be tied directly to a particular project.
 - ii. Departmental Labour Costs ("DLC") – DLC are determined by the degree of support each functional group provides directly to capital projects. DLC is generally allocated from the Operations and Engineering departments.
 - iii. Allowance for Interest During Construction ("AIDC") – AIDC represents the interest component related to the financing charges incurred during the

creation of construction projects.

- iv. Alliance Partner Overheads – These are the overheads associated with Enbridge Gas' Alliance partners.

The Enbridge Enterprise Wide Capitalization Policy was filed in the 2019 Rates proceeding – EB-2018-0305 - in the response to undertaking JT1.12.

- b) The issue of the costs to be included in an ICM request is an active issue still before the Board in the 2019 Rates proceeding (EB-2018-0305). Enbridge Gas did not exclude any cost components from the Estimated Project Cost and notes that the Project does not meet the \$10 million materiality threshold for ICM funding.

ENBRIDGE GAS INC.
Answer to Interrogatory from
Board Staff (STAFF)

Reference: Application, Exhibit D, Tab 2, Schedule 1: Estimated Project Cost, page 1, paragraph 2

Preamble:

Enbridge Gas' direct capital cost estimates for the project include a 25% contingency, with the exception of a 10% contingency applied to Consultant Costs. Enbridge explains that the lower contingency for Consultant Costs is because most of this work has been completed.

Questions:

- a) Please provide contingency percentages for similar pipeline projects approved by the OEB. Include pipeline projects by Enbridge Gas Inc. or its predecessor companies. The information should include the proponent, need, location, year of OEB approval, year of construction, length, pipeline diameter and total estimated costs, contingency percentage and actual capital costs, if the project is completed.
- b) Please explain the rationale, including specific risks related to increases in capital costs that warrant a 25% contingency, for Enbridge's forecast of the St. Laurent Project's direct capital costs.

Response

- a) Please see the attached table for similar pipeline projects approved by the OEB.
- b) The Contingency applied to this Project conforms to Enbridge Gas' guidelines for a project at this stage of scope development and risk profile. At the time the estimate was prepared the Project maturity level was at the design stage and preliminary drawings were available. The contingency funding for the Project is required to cover the costs of known risks that cannot be estimated at the time an estimate of project costs is prepared. These risks include underground issues (for example, utility conflicts and subsurface conditions such as rock and soil quality), working space requirements, the possibility of delays due to weather and significant congestion with traffic and limited working hours and lane closing restrictions.

The contingency percentage is the same as that used for the Liberty Village project. The St. Laurent project is very similar to the Liberty Village project in terms of the amount of urbanization along the pipeline route. The Liberty Village project is being constructed in the City of Toronto. The St. Laurent project will be constructed in the City of Ottawa. There is a high probability that the risks identified above will materialize as the St. Laurent project is constructed. Enbridge Gas would note that to date 100% of the contingency applied to the Liberty Village project has been used.

The contingency percentage is higher than the Georgian Sands project because the St. Laurent project will be constructed in a much more urbanized area. The Georgian Sands project will be constructed in a rural area with a lower potential for the aforementioned risks to materialize. For example, there is less underground infrastructure, low traffic volumes and only a few residences and businesses along the Georgian Sands pipeline route.

Proponent	Project	Need	Location	Year of OEB Approval	Year of Construction	Length	Pipeline Diameter	Total Estimated Costs	Contingency Percentage	Actual Capital Costs
Enbridge Gas Inc.	Georgian Sands	To maintain existing network pressures and meet customer growth.	Simcoe County	2019	2019/2020	8m 6.4km	NPS 8 XHP Steel NPS 6 IP Polyethelene	\$2.8 Million	20%	Not Available
Enbridge Gas Inc.	Liberty Village	Customer requests for gas service and forecasted growth.	City of Toronto	2018	2018/2019	900m 200m 85m	NPS 8 IP Steel NPS 6 IP Polyethelene NPS 4 IP Polyethelene	\$3.6 Million	25%	Not Available

ENBRIDGE GAS INC.
Answer to Interrogatory from
Board Staff (STAFF)

Reference: Application, Exhibit B, Tab 1, Schedule 1, paragraph 5, page 2; paragraph 14. Page 5 and Application, Exhibit F, Tab 1, Schedule 1, Attachment 1, page 3: Project Activities

Preamble:

The proposed replacement pipeline is part of the multiple phase replacement of a 13 km steel distribution NPS 12 pipeline in the City of Ottawa referred to as St. Laurent Project. The St. Laurent Project is identified in Enbridge Gas Utility System Plan¹. The in-service date for the St. Laurent Project is 2022.

Enbridge Gas indicated that construction of the segment subject to this application must start in August 2019 and requested that the OEB issue a decision by August 2019.

Enbridge Gas stated that the existing pipeline "...that will be decommissioned will be abandoned in accordance with Enbridge's Construction maintenance manual". Enbridge Gas also stated that the 1.7 km segment of the pipeline being replaced "...will not be abandoned until 2022 when the NPS 12 St. Laurent pipeline will be replaced in its entirety".

Questions:

- a) For the entire St. Laurent Project please provide a complete construction schedule by phase and segment, including segments abandoning, construction completion and in-service date.
- b) Please discuss the impacts on Enbridge Gas construction schedule and the overall St. Laurent Project in-service date in the event that the OEB's decision is not issued by August 2019.
- c) Please explain the reasons for not abandoning the segment that will be replaced until 2022.
- d) Please confirm that Enbridge Gas' service to its customers currently served by 13 km St. Laurent pipeline will not be interrupted and explain how will the service be provided during decommissioning of the St. Laurent pipeline segments.

¹ EB-2018-0305, Ex C1/T1/S1 and Ex C1/T2/S1

- e) What are the regulatory requirements that Enbridge Gas will have to follow for decommissioning and abandonment of the existing pipeline? Please confirm that the abandonment of the existing pipeline will be in accordance with the current regulatory requirements in terms of procedure and safety.
- f) Please describe the measures that will have to be taken by Enbridge Gas to complete decommissioning works during the 3 year road works moratorium imposed by the City of Ottawa?

Response

- a) Please refer to the table below.

Phase	Project Name	Project Start	In-service date	Installed	Customers	Abandonment	Year abandoned
1	Avenue O Pressure Increase from 30 psi to 45 psi	May 29/18	May 29/18	n/a	29	n/a	n/a
2	Plastic - Tremblay	July 29/19	Dec 31/19	123m - 8" PE 1282 m - 6" PE 142 m - 4" PE 1841 m - 2" PE	179	776 m - 1" & 1¼" ST 1199 m - 2" ST	2019
2	Plastic - St - Laurent (Donald to Montreal)	Sept 3/19	Dec 31/19*	1726 m - 6" PE 11 m - 2" PE	66		**
3	Plastic - Lower Section 1	May 1/20	Dec 31/20	1.9 km - 4" PE	186	1.9 km - 4" SC 148.8 m - 12" SC	2020
3	Plastic - Lower Section 2	May 1/21	Dec 31/21	1.1 km - 4" PE	44	565 m - 4" SC 371 m - 12" SC	2021
3	Plastic - Coventry/Oglivie	May 1/21	Dec 31/21	1.5 km - 6" PE	14	1.5 km - 6" SC	2021
3	Plastic - St Laurent (Donald to Hwy 417)	May 1/21	Dec 31/21	400 m - 6" PE 261 m - 2" PE	45		**
3	Plastic - St Laurent (Donald to Rockcillfe)	May 1/21	Dec 31/21	3.9 km - 6" PE	133		**
4	Steel - Queen Mary	April 1/22	Dec 31/22	3.5 km - 12" ST	1	2.5 km - 12" SC	2022
4	Steel - Aviation Parkway	April 1/22	Dec 31/22	8.0 km - 12" ST		9.5 km - 12" SC	2022

*Assuming OEB grant LTC Aug 2019
 ** To be abandoned with Phase 4 in 2022

- b) The project has been split into 4 phases with the overall objective to replace the existing NPS 12 Extra High Pressure (XHP) steel pipeline which is currently running along St Laurent Blvd in an urbanized area to a more rural area that is less developed. Because there are currently over 700 services off the existing XHP gas main there is a need to install an intermediate pressure (IP) Plastic gas main on St Laurent Boulevard and transfer all the services off the XHP gas main to the new IP gas main. Phase 1 was a pressure elevation which was completed in 2018. Phase 2 and 3 of the Project requires the installation of new polyethylene pipelines which are needed to service customers along the route of the existing NPS 12 XHP pipeline prior to its abandonment. Phase 4 of the Project is the installation of the new NPS 12 XHP pipeline and the abandonment of the existing NPS 12 XHP on St. Laurent Boulevard.

Phase 2 has a timing constraint and is directly driven by the City of Ottawa Roads Program and co-ordination with other utilities. The City of Ottawa will be paving St. Laurent Boulevard between Donald Street and Montreal Road in May 2020 and will be paving Montreal Road at St. Laurent Boulevard in the fall of 2019. The City of Ottawa will also be replacing their water mains on the Avenues next year. Once the roadway has been paved, a 3 year moratorium is put in place to ensure that the road cannot be excavated until the moratorium has expired. The moratorium ensures that the integrity of the pavement structure is protected, and also serves to minimize the disruptions and inconvenience to the public resulting from repeated construction activity. Enbridge's plan is to have Phase 2 completed by the end of 2019 prior to the paving and has been working on a construction schedule to accommodate this. It has been determined the estimated time to complete Phase 2 St Laurent (Donald to Montreal) of the project is 110 days and since the historical weather in the late fall in Ottawa has not been favorable, Enbridge Gas would like to complete this work before the winter to limit the amount of work done during extreme temperature and weather.

If Enbridge does not receive a decision in August of 2019 Enbridge would not be able to complete Phase 2 St. Laurent (Donald to Montreal) due to the road moratorium and would have to wait until after the moratorium has expired to complete this Phase. This will defer the abandonment portion of Phase 4 as the NPS 12 XHP pipeline is a single fed system meaning there is no back up supply of gas and the line cannot be abandoned until the new line is in place and all the services are transferred to the new gas main. Given Phase 3 and the installation portion of Phase 4 are not dependant on the completion of other Phases and are not on St Laurent Blvd where the moratorium would be in place, those phases could be completed even if the Phase 2 and the abandonment portion of Phase 4 was delayed.

- c) As summarized above in b), the segment on St. Laurent Boulevard between Donald Street and Montreal Road cannot be abandoned until the new NPS 12 XHP pipeline is installed and all the services for the entire project off the existing line have been transferred to the new IP gas mains. The existing NPS 12 XHP is a one-way feed from St. Laurent Control Station to Rockcliffe Station and is a critical supply to the city of Ottawa and Gatineau, supplying natural gas to more than 165,000 customers that cannot be abandoned until all customers have been transferred to the new IP mains.
- d) The customers served by the existing 13 km St. Laurent pipeline will only be interrupted on the day they are being transferred over to the newly installed pipeline. Enbridge Gas and its Contractor will coordinate these changeovers with customers and provide as much notification as possible to limit the amount of time gas is unavailable. The overall St. Laurent project has been broken down into the phases identified in the response to a) above, to facilitate the coordination of the main

installations on several different roads (including the new NPS 12 XHP in a rural area) with the municipal capital programs and other utilities, manage the number customer changeovers/interruptions to ensure customer satisfaction and minimize the construction impacts across the entire project area by exercising an attainable execution schedule.

- e) When decommissioning a pipeline Enbridge Gas follows its Construction & Maintenance Manual. The Construction & Maintenance Manual has been developed to, at a minimum, comply with the requirements of CSA Z662. Enbridge Gas confirms that the existing pipeline will be abandoned in accordance with the requirements of CSA Z662.
- f) Enbridge Gas plans to decommission the NPS 12 XHP Steel pipeline in 2022. According to Enbridge's Construction & Maintenance Manual Enbridge Gas must sectionalize the decommissioned pipeline every 1000m or less. The length of pipeline between Montreal Road and Donald Street on St. Laurent Boulevard is approximately 1700m and therefore would need to be sectionalized once over that span. If the moratorium is still in place when the sectionalisation work is performed, Enbridge Gas will obtain engineering approval to deviate from the 1000m sectionalisation length and leave the 1700m pipe section intact.

ENBRIDGE GAS INC.
Answer to Interrogatory from
Board Staff (STAFF)

Reference: Application, Exhibit C, Tab 1, Schedule 3: Environmental Report, paragraphs 5 and 6, pages 1-2

Preamble:

Copies of the Environmental Report were submitted to the Ontario Pipeline Coordination Committee (OPCC) for review and comment on April 11, 2019. On May 6, 2019, Enbridge Gas received a comment from the Ministry of Natural Resources and Forestry (MNR) indicating it had no concerns with the St. Laurent Project.

Question:

Please file all comments (in the tabular format) that Enbridge Gas has received as part of the OPCC review since May 6, 2019. Include the dates of communication, the issues and concerns identified by the parties, as well as Enbridge Gas' responses and actions to address these issues and concerns.

Response

Since May 6, Enbridge Gas has received 1 comment as part of the OPCC review. This comment was received from the Ministry of Environment, Conservation & Parks ("MECP"). A summary of correspondence received from the MECP and Enbridge Gas' responses and actions is provided below.

Dates of Communication	Name	Issues & Concerns Identified	Response and Action to Address Issues & Concerns
May 21-24, 2019	Vicki Mitchell Regional EA Coordinator MECP Eastern Region 1259 Gardiners Road, Kingston ON	Acknowledged receipt of the Project ER. Report review completed, and no concerns were identified.	No issue resolution required. Enbridge thanked Vicki for reviewing and providing comment.

ENBRIDGE GAS INC.
Answer to Interrogatory from
Board Staff (STAFF)

Reference: Application, Exhibit F, Indigenous Consultation, Tab 1, Schedule 1, pages 1-3; and Attachment 2: Delegation Letter, dated March 4, 2019

Preamble:

Enbridge Gas stated that it filed its Indigenous Consultation Report (ICR) with the Ministry of Energy, Northern Development and Mines (MENDM) on May 15, 2019. Two Indigenous communities – Algonquins of Ontario and Mohawks of Akwesasne – were identified by the MENDM to be consulted by Enbridge Gas on behalf of the Crown in its delegation letter to Enbridge Gas, dated March 4, 2019.

According to Enbridge Gas, it will file with the OEB the MENDM's Sufficiency Letter, as soon as it receives it from the MENDM.

Enbridge Gas committed to offer opportunities to Algonquins of Ontario and Mohawks of Akwesasne to participate in the Stage 2 Archeological Assessment and use the information gathered from these Indigenous communities in its environmental assessment.

Questions:

- a) Please file any additional documentation received from the MENDM, specifically a Sufficiency Letter from the MENDM, if it has been received.
- b) Please describe any concerns or issues that the MENDM has identified since filing of the ICR that may delay issuance of the Sufficiency Letter.
- c) If the Sufficiency Letter has not been received please provide the expected date of issuance of the MENDM Sufficiency Letter to Enbridge Gas.
- d) What are the outstanding issues and concerns identified by the Indigenous communities in the process of Indigenous consultation?
- e) What is the planned approach that Enbridge Gas will take to resolve and address any outstanding issues or concerns raised in the process of Indigenous consultation to date?

- f) What is the status of completion of Stage 2 Archeological Assessment? If it has not been completed what is the planned start and completion date?

Response:

- a) Enbridge Gas received a sufficiency letter for the Project from the MENDM on August 7, 2019. This letter is set out at Attachment 1 to this response.
- b) The MENDM identified one issue regarding consultation with the Algonquins of Ontario (“AOO”) in relation to the Project. This issue related to concerns the AOO had raised with the Stage 2 Archeological Assessment (“AA”) for the Project. On July 3, 2019, Enbridge Gas received an email from the MENDM regarding this issue (see Attachment 2 to this response). On July 5, 2019, Enbridge Gas met with the MENDM by way of phone call to discuss the issue. During the meeting, Enbridge Gas explained that due to weather delays, permitting timelines and other Project-related factors, it would not be possible to provide the AOO with the 30 to 45 day lead time it had requested in order to participate in the Stage 2 field work. Rather, Enbridge Gas had suggested different lead times (e.g. two and a half weeks prior to the Stage 2 being conducted). Please see Attachment 3 to this response, which contains a record of Enbridge Gas’ correspondence with the AOO in relation to the Stage 2 AA for the Project. Ultimately, the AOO chose not to participate in the Stage 2 AA field work. Enbridge Gas provided this information to the MENDM for their awareness. Details on the AOO’s concerns are set out in the response to d) below.
- c) Please see the response to a) above.
- d) The Mohawk Council of Akwesasne have not expressed any Project specific concerns. With respect to the AOO, as indicated in response to b) above, the AOO advised that they required a minimum of 30-45 days advance notice prior to any commencement of the Stage 2 field work in order to arrange for a monitor to participate. Enbridge Gas explained that with weather delays, permitting timelines and other Project related factors, it would be difficult to provide such advance notice without avoiding last minute changes in the schedule. Therefore, in an effort to help ensure an AOO monitor was present during the Stage 2 field work prior to the expiry of the locates, Enbridge Gas deferred the start of the archaeological field work and provided the AOO with two and half weeks’ notice as opposed to the three weeks was requested by the AOO. The AOO responded indicating that they appreciated Enbridge Gas’ time and efforts, but they were not able to secure a liaison to participate in the field work. The AOO expressed an interest in reviewing a draft copy of the Stage 2 report. Enbridge Gas provided the AOO with a draft copy of the report and offered to provide capacity funding for document review.
- e) Enbridge Gas has offered the AOO the opportunity to participate in the Stage 2

Archaeological Assessment and offered reasonable capacity funding to help support document review regarding the draft Stage 2 Archaeological Report. Enbridge Gas will continue to engage with the AOO and the Mohawk Council of Akwesasne to address, as appropriate, any Project-related concerns that may arise.

- f) The Stage 2 Archaeological Report was completed in June 2019 and is currently being reviewed by the AOO. Enbridge Gas looks forward to receiving and considering comments from the AOO regarding the Algonquins' Traditional Territory within a historical and cultural context.

Ministry of Energy, Northern
Development and Mines

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

77 Grenville Street
6th Floor
Toronto ON M7A 2C1

77, rue Grenville
6^e étage
Toronto ON M7A 2C1



Indigenous Energy Policy

VIA EMAIL

August 7, 2019

Zora Crnojacki
Chair, Ontario Pipeline Coordinating Committee
P.O. Box 2319
2300 Yonge Street
Toronto ON M4P 1E4

Re: Consultation Sufficiency Opinion for St. Laurent Pipeline Project

Dear Ms. Crnojacki,

The Ontario Ministry of the Energy, Northern Development and Mines (ENDM) has completed its review of Enbridge's Indigenous consultation report for the St. Laurent Pipeline Project. This letter is to notify you that based on the information provided and through contacting the communities directly, ENDM is of the opinion that the procedural aspects of consultation undertaken by Enbridge to date for the purposes of the Ontario Energy Board's Leave to Construct for the St. Laurent Pipeline Project is satisfactory.

If you have any questions about this letter or require any additional information, please contact Emma Sharkey at 416-529-8953 or Emma.Sharkey@Ontario.ca.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon McCabe", written in a cursive style.

Shannon McCabe
Manager
Indigenous Energy Policy

c: Ontario Energy Board
Ontario Pipeline Coordinating Committee

From: Sharkey, Emma (ENDM) [mailto:Emma.Sharkey@ontario.ca]
Sent: Wednesday, July 03, 2019 4:49 PM
To: Joel Denomy; McCabe, Shannon (ENDM)
Cc: Sonia Fazari
Subject: [External] RE: St. Laurent Pipeline Project

EXTERNAL: PLEASE PROCEED WITH CAUTION.

This e-mail has originated from outside of the organization. Do not respond, click on links or open attachments unless you recognize the sender or know the content is safe.

Hi Joel,

I hope you're well. I'm hoping for a few updates on consultation for the St. Laurent project, building on the Indigenous Consultation Report (ICR) provided via your email below.

I've been in conversation with the Algonquins of Ontario (AOO), and they had some concerns about the Stage 2 Archaeological Assessments. The ICR records show that in correspondence towards the beginning of May, the AOO communicated interest in participation in the Stage 2 work, and requested 30-45 days notice in order to schedule staff to attend. My current understanding is that the work is scheduled to begin this week, and that AOO were given 5 days notice of work commencement. Can you fill me in on the timeline from your perspective?

The other item the AOO raised was that they are interested in developing a Long-term Relationship Agreement with Enbridge, and that the St. Laurent project would be encompassed under that. The ICR indicates the AOO have no project-specific concerns, so I'm hoping you can share your perspective on how the proposed Long-term Relationship Agreement is/isn't connected to the project.

If you could call me to discuss, I'm at 416-529-8953.

Thanks,

Emma

From: Joel Denomy <Joel.Denomy@enbridge.com>
Sent: May 15, 2019 3:57 PM
To: Sharkey, Emma (ENDM) <Emma.Sharkey@ontario.ca>; McCabe, Shannon (ENDM) <Shannon.McCabe@ontario.ca>
Cc: Sonia Fazari <Sonia.Fazari@enbridge.com>
Subject: St. Laurent Pipeline Project

Hi Emma,

Today Enbridge Gas Inc. (“Enbridge Gas”) filed with the Ontario Energy Board, an application for leave to construct the St. Laurent Pipeline Project (the “Project”). Included in the application for leave to construct is the indigenous consultation report for the Project which I have attached for your review. Enbridge Gas is requesting the Ministry of Energy, Northern Development and Mines provide its assessment of the adequacy of Enbridge Gas’ Indigenous consultations for the Project by mid to late June 2019. Please contact me if you have any questions.

Joel Denomy, M.A. CFA

Technical Manager, Regulatory Applications

Regulatory Affairs

—

ENBRIDGE GAS INC.

TEL: 416-495-5676 | CELL: 647-231-4745 | joel.denomy@enbridge.com

500 Consumers Road, North York, ON M2J 1P8

enbridge.com

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From: Sonia Fazari
Sent: Friday, July 05, 2019 12:09 PM
To: McCabe, Shannon (ENDM)
Cc: Joel Denomy
Subject: FW: Enbridge Gas Inc. proposed St. Laurent Gas Pipeline Project - City of Ottawa (Our File CP 277-5)

Hi Shannon,

As promised, please find below the email correspondence with the AOO regarding the St. Laurent Blvd. Project for your information and reference. Please don't hesitate to give us a call with any additional questions you may have.

Have a great weekend!
Sonia

From: Sonia Fazari
Sent: Friday, July 05, 2019 12:06 PM
To: Cronier, Sarah (Algonquins Of Ontario)
Cc: Stavinga, Janet (Algonquins Of Ontario)
Subject: RE: Enbridge Gas Inc. proposed St. Laurent Gas Pipeline Project - City of Ottawa (Our File CP 277-5)

Hi Sarah,

Thanks for getting back to me regarding AOO's participation in the stage 2 field work. As previously committed, Enbridge would be pleased to provide reasonable capacity funding to help support the AOO's review of the stage 2 archaeological report. In the meantime, please don't hesitate to reach out with any further questions you may have.

Have a great weekend,
Sonia

Sonia Fazari

Sr. Advisor, Municipal and Indigenous Affairs, Eastern Region
Public Affairs and Communications

ENBRIDGE GAS INC.

TEL: 416-753-6962 | CELL: 416-525-2497
500 Consumers Road
North York, ON M2J 1P8

enbridge.com
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From: Cronier, Sarah (Algonquins Of Ontario) [mailto:scronier@tanakiwin.com]
Sent: Friday, July 05, 2019 11:04 AM
To: Sonia Fazari
Cc: Stavinga, Janet (Algonquins Of Ontario)
Subject: [External] RE: Enbridge Gas Inc. proposed St. Laurent Gas Pipeline Project - City of Ottawa (Our File CP 277-5)

EXTERNAL: PLEASE PROCEED WITH CAUTION.

This e-mail has originated from outside of the organization. Do not respond, click on links or open attachments unless you recognize the sender or know the content is safe.

Good morning Sonia,

I hope you are doing well. I apologize for not being available to take your call yesterday, I was tied up in my Heritage and Culture Working Group meeting.

Regarding that missed call – seeking confirmation of AOO liaison participation, the AOO unfortunately have not been able to secure participation for this project. Thank you for your time and efforts on this initiative and moving forward I hope that early notification can be better accommodated and that the AOO will be able to participate in future work.

I would ask that the DRAFT archaeological report be provided to the AOO upon its completion for our internal review. Please note that this review costs as per the cost schedule shared with you on May 7, 2019. Once we have completed our review, we will provide comments or possible revisions. Once the AOO are satisfied with the contents of the report the report can be submitted to MTCS for entry into the public registry.

The reasoning behind this review and comment process is to prevent the possible perpetuation of historical inaccuracies, to ensure that work within unceded Algonquin Traditional Territory recognizes and highlights the history and culture etc. As reports are in the public registry for future reference any errors are compounded and continued over time, the AOO seek to change this through current internal reviews, relationship building, early notification and our Draft Enhanced Standards and Guidelines (which I would be happy to discuss with you in the future).

If you have any questions, comments or concerns please do not hesitate to contact me via phone next week, as I am out of office for the remainder of the day or by email this afternoon.

Have a good weekend.

Kind regards,
Sarah Cronier
Cultural Heritage Project Assistant

Algonquins of Ontario Consultation Office
31 Riverside Drive, Suite 101
Pembroke, ON K8A 8R6

Tel: [613-735-3759](tel:613-735-3759)

Fax: [613-735-6307](tel:613-735-6307)

Email: scronier@tanakiwin.com

Website: www.tanakiwin.com

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From: Sonia Fazari <Sonia.Fazari@enbridge.com>

Sent: Friday, June 28, 2019 9:42 AM

To: Cronier, Sarah (Algonquins Of Ontario) <scronier@tanakiwin.com>

Cc: Stavinga, Janet (Algonquins Of Ontario) <jstavinga@tanakiwin.com>

Subject: RE: Enbridge Gas Inc. proposed St. Laurent Gas Pipeline Project - City of Ottawa (Our File CP 277-5)

Hi Sarah,

Thanks for the follow up note and for reaching out to your monitors regarding the opportunity to participate in the Stage 2 Archaeological Assessment for the Enbridge Gas St. Laurent Project.

I have been informed that the locates for the Stage 2 Archaeological Assessment are only valid until July 13th.

I can understand your need to have this information 30-45 days in advance but with weather delays, permitting timelines and other project related factors, it's difficult to provide such advance notice without avoiding last minute changes in the schedule. Due to the difficulty obtaining clearances on the required locates for this project, this work has already been delayed 4-5 weeks, and we are in the position that we need to mobilize this fieldwork as soon as possible.

In an effort to extend the archaeological work to help ensure an AOO monitor is present during the Stage 2 field work before the locates expire, I would kindly request that you please re-issue the notice to your monitors and indicate that we are planning to start the field work on Tuesday, July 9, 2019. The field work will take approximately two days weather permitting. I realize it's not the three week extension that you are requesting but I trust that two and half weeks advance notice is sufficient time to secure a monitor from the initial June 21st email I sent you outlining the details.

Please find attached a simplified archaeological monitoring agreement for your review and input. Should you wish with to make any changes and/or updates to the draft monitoring agreement, I would like to suggest they be made through tract changes. Please advise what the hourly rate is for the AOO monitor.

Thank you,
Sonia

Sonia Fazari

Sr. Advisor, Municipal and Indigenous Affairs, Eastern Region
Public Affairs and Communications

ENBRIDGE GAS INC.

TEL: 416-753-6962 | CELL: 416-525-2497

500 Consumers Road
North York, ON M2J 1P8

enbridge.com

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From: Cronier, Sarah (Algonquins Of Ontario) [<mailto:scronier@tanakiwin.com>]
Sent: Wednesday, June 26, 2019 12:59 PM
To: Sonia Fazari
Cc: Stavinga, Janet (Algonquins Of Ontario)
Subject: [External] RE: Enbridge Gas Inc. proposed St. Laurent Gas Pipeline Project - City of Ottawa (Our File CP 277-5)

EXTERNAL: PLEASE PROCEED WITH CAUTION.

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Good afternoon Sonia,

Thank you for your email.

I will circulate the outreach you have provided, to our list of archaeological field liaisons. However, the AOO are seeking that work be delayed until Monday July 22, 2019 to accommodate our participation

As stated in my previous correspondence, dated May 7, 2019, the AOO require a minimum of 30-45 days advanced notice to the commencement of field work. Within the email I also provided a template to be filled out with the field work dates, equipment, location etc. which was to be provided to me as this is the information I am to circulate to the liaisons.

In your response received on May 9, 2019, it was stated that work was to possibly begin on the weeks of May 27 or June 3, and I was told I was to be provided a draft archaeological monitoring agreement for our internal review. Unfortunately, I was not provided with this agreement in the days following as I awaited the completed liaison template and I was growing concerned about the proposed timing of the work and the outreach timeline.

In response on May 9, I clarified that to have work started on the weeks of May 27 or June 3 I would have had an outreach already circulated, which would have required the outreach template to be completed. I specified that the sooner I had firm dates it would be easier to have a liaison wait to participate if work was to be delayed as opposed to having work started sooner and participation is not secured.

Unfortunately, the AOO are now put in a position that we attempted to avoid. Receiving the template on June 21, 2019 with work beginning on July 2, 2019 is not enough time to secure participation as discussed. The AOO again, request that work be delayed until July

22, 2019 to accommodate our agreed participation.

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

Regards,
Sarah Cronier
Cultural Heritage Project Assistant

Algonquins of Ontario Consultation Office

31 Riverside Drive, Suite 101

Pembroke, ON K8A 8R6

Tel: [613-735-3759](tel:613-735-3759)

Fax: [613-735-6307](tel:613-735-6307)

Email: scronier@tanakiwin.com

Website: www.tanakiwin.com

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From: Sonia Fazari <Sonia.Fazari@enbridge.com>

Sent: Friday, June 21, 2019 1:12 PM

To: Cronier, Sarah (Algonquins Of Ontario) <scronier@tanakiwin.com>

Subject: RE: Enbridge Gas Inc. proposed St. Laurent Gas Pipeline Project - City of Ottawa (Our File CP 277-5)

Hi Sarah,

Please find below the information regarding the planned Stage 2 archaeological assessment. The green sections in the attached map indicate where the stage 2 fieldwork will be required. I will be in touch as we get closer to the date to confirm the details. We are still securing locates but wanted to provide you with the details regarding the planned start date and time for scheduling purposes. Please don't hesitate to contact me any questions you may have.

Regards, Sonia

Project Description:	St. Laurent Blvd Pipeline Project Stage 2 Archaeological Assessment
Meeting Point:	Tentatively in the parking lot to the southeast of the intersection of St. Laurent Boulevard and Montreal Road.
Onsite Contact	Matthew Severn (519-661-9028)
Work Scope:	Completion of Stage 2 archaeological assessments along St. Laurent, within road right-of-way. Specifically, the work will involve the hand excavation of shovel sized test pits with a team of Dillon/TMHC archaeologists as well as some photo-documentation along the corridor.
Schedule:	The Stage 2 is scheduled to begin July 2, 2019

weather permitting and will consist of 2 days of fieldwork. The fieldwork will begin on July 2 around 3 pm until around 6 pm, and on July 3 the fieldwork will begin at 7:30 am and will be done around 10 am. These times are dependent on travel times to/from London and our findings.

****This information will be confirmed 1-2 days prior to the field work****

Sonia Fazari

Sr. Advisor, Municipal and Indigenous Affairs, Eastern Region
Public Affairs and Communications

ENBRIDGE GAS INC.

TEL: 416-753-6962 | CELL: 416-525-2497

500 Consumers Road
North York, ON M2J 1P8

enbridge.com

Integrity. Safety. Respect.

ENBRIDGE GAS INC.
Answer to Interrogatory from
Board Staff (STAFF)

Reference: Application, Exhibit A: General

Preamble:

Enbridge Gas has applied for leave to construct facilities under section 90(1) of the OEB Act.

Question:

OEB staff has prepared the following draft Conditions of Approval. If Enbridge Gas does not agree to any of the draft conditions of approval noted below, please identify the specific conditions that Enbridge Gas disagrees with and explain why. For conditions in respect of which Enbridge Gas would like to recommend changes, please provide the proposed changes.

Draft
Leave to Construct Conditions of Approval
Application under Section 90 of the OEB Act
Enbridge Gas Inc.
EB-2019-0006

1. Enbridge Gas Inc. (Enbridge Gas) shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in EB-2019-0006 and these Conditions of Approval.
2. (a) Authorization for leave to construct shall terminate 18 months after the decision is issued, unless construction has commenced prior to that date.

(b) Enbridge Gas shall give the OEB notice in writing:
 - i. of the commencement of construction, at least ten days prior to the date construction commences;
 - ii. of the planned in-service date, at least ten days prior to the date the facilities go into service;

- iii. of the date on which construction was completed, no later than 10 days following the completion of construction; and
 - iv. of the in-service date, no later than 10 days after the facilities go into service.
3. Enbridge Gas shall implement all the recommendations of the Environmental Protection Plan and Environmental Report filed in the EB-2019-0006, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.
4. Enbridge Gas shall advise the OEB of any proposed 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 assessments and approvals, and all other approvals, permits, licences, certificates and rights required to construct the proposed facilities. Except in an emergency, Enbridge Gas 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), Enbridge Gas shall file a Post Construction Financial Report, which shall provide a variance analysis of project cost, schedule and scope compared to the estimates filed in this proceeding, including the extent to which the project contingency was utilized. Enbridge Gas 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 Enbridge Gas proposes to start collecting revenues associated with the project, whichever is earlier.
6. Both during and after construction, Enbridge Gas shall monitor the impacts of construction, and shall file with the OEB one paper copy and one electronic (searchable PDF) version of each of the following reports:
 - (a) A post construction report, within three months of the in-service date, which shall:
 - i. Provide a certification, by a senior executive of the company, Enbridge Gas' adherence to Condition 1
 - ii. Describe any impacts and outstanding concerns identified during

construction

- iii. Describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction
 - iv. Include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions
 - v. Provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licences, and certificates required to construct, operate and maintain the proposed project
- (b) A final monitoring report, no later than fifteen months after the in-service date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:
- i. Provide certification, by a senior executive of the company, Enbridge Gas' adherence to Condition 3
 - ii. Describe the condition of any rehabilitated land
 - iii. Describe the effectiveness of any such actions taken to prevent or mitigate any identified impacts of construction
 - iv. Include the results of analyses and monitoring programs and any recommendations arising therefrom
 - v. Include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions
7. Enbridge Gas shall designate one of its employees as project manager who will be responsible for the fulfillment of these conditions, and shall provide the employee's name and contact information to the OEB and to all the appropriate landowners, and shall clearly post the project manager's contact information in a prominent place at the construction site.

The OEB's designated representative for the purpose of these Conditions of Approval shall be the OEB's Manager of Supply and Infrastructure (or the Manager of any OEB

successor department that oversees leave to construct applications).

Response

Enbridge Gas agrees with all of the draft Conditions of Approval (“COA”) save for COA 2. (b) i. Given the requirement to have the Project constructed prior to the road moratorium coming into force, Enbridge Gas would like to begin construction on the Project as soon as possible. Enbridge Gas is therefore suggesting that COA 2. (b) i. be reworded as follows:

2. (b) i. of the commencement of construction, at least five ~~ten~~ days prior to the date construction commences;