



Joel Denomy
Technical Manager, Regulatory
Applications

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-2018-0188
Chatham-Kent Rural Project – Request to Vary**

Please find attached a Request to Vary Form (Attachment 1) as submitted by Enbridge Gas Inc. (“Enbridge Gas”) for the Chatham-Kent Rural Pipeline Project (“the Project”). As detailed in Attachment 1, the rationale for this request is that a 90-metre section of NPS 12 pipe that Enbridge Gas intends to use to construct the Project has a lower Pipe Grade (minimum 359 MPa) than the Pipe Grade (minimum 386 MPa) as filed at Schedule 15 p. 2 of 2 of the pre-filed evidence (see Attachment 2).

As confirmed in the attached correspondence from the Technical Standards and Safety Authority (“TSSA”) (Attachment 3), not only does the lower grade pipe comply with all necessary code requirements, the TSSA identified no issue or concern with the use of this pipe for the Project. For this reason, Enbridge Gas respectfully requests a timely review and approval of this request.

Should you have any questions concerning this request please contact me at (416) 495-5676.

Yours truly,

[Original Signed by]

Joel Denomy, M.A. CFA
Technical Manager, Regulatory Applications

c.c.: N. Marconi (OEB Staff)
A. Manzano (OEB Staff)
I. Mondrow (IGUA)
D. Richarson, L. DeMarco, J. McGillivray, L. Sault (Anwaatin Inc.)

REQUEST TO VARY

Project Name: Chatham-Kent Rural Pipeline Project

OEB File Number: EB-2018-0188

Change Request: 1

Description and Rationale for Change

Enbridge Gas is requesting to use a lower grade pipe to construct a 90-metre section of NPS 12. Specifically, this 90-metre section of pipe has a lower Pipe Grade (minimum 359 MPa) than the Pipe Grade (minimum 386 MPa) as filed at Schedule 15 page 2 of 2 in the pre-filed evidence for the Project. The Technical Standards and Safety Authority ("TSSA") has indicated that the lower Pipe Grade complies with all necessary code requirements and has no issue with the use of this pipe for the Project.

Construction and Restoration Practices

No impact to construction and/or restoration practices

Environmental

No impact to the environment

Consultation

Consulted with the Technical Standards and Safety Authority ("TSSA") to ensure Change Request complies with all necessary Code requirements

Lands

No impact to lands

Costs

No material impact to costs

Schedule

No impact to the in-service date

Attachments

Attachment 1 – Request to Vary Form

Attachment 2 – Updated pipe specifications showing the lower Pipe Grade (minimum 359 MPa) for the 90-metre section of NPS 12 pipe as provided to the TSSA (note: pipe used for the NPS 8 portion of the Project did not change)

Attachment 3 – Correspondence between Enbridge Gas and TSSA

DESIGN AND PIPE SPECIFICATIONS- NPS 8 SECTION**Design Specifications:**

Design Class Location	-	Class 3
Design Factor	-	0.8
Location Factor (Road)	-	0.625
Location Factor (General)	-	0.700
Joint Factor	-	1.00
Design Temperature	-	M5C (below-grade) M30C (above-grade)
Design Pressure	-	6895 kPa
Test Medium	-	Water
Minimum Test Pressure	-	9653 kPa
Minimum Valve/Flange Rating	-	PN
100		
Minimum Depth of Cover (General)	-	0.6 m
Minimum Depth of Cover (Road)	-	1.2 m

Pipe Specifications:

Size	-	NPS 8
Outside Diameter	-	219.1 mm
Wall Thickness	-	Minimum 5.6 mm
Grade	-	Minimum 359 MPa
Type	-	Electric Resistance Weld
Description	-	C.S.A. Standard Z245.1
Category	-	Cat. I, M5C
Coating	-	FBE or YJ
% SMYS	-	37.6%- Based on the above minimums

DESIGN AND PIPE SPECIFICATIONS- NPS 12 SECTION

Design Specifications:

Design Class Location	-	Class 3
Design Factor	-	0.8
Location Factor (Road)	-	0.625
Location Factor (General)	-	0.700
Joint Factor	-	1.00
Design Temperature	-	M5C (below-grade) M30C (above-grade)
Design Pressure	-	6895 kPa
Test Medium	-	Water
Minimum Test Pressure	-	9653 kPa
Minimum Valve/Flange Rating	-	PN
100		
Minimum Depth of Cover (General)	-	0.6 m
Minimum Depth of Cover (Road)	-	1.2 m

Pipe Specifications:

Size	-	NPS 12
Outside Diameter	-	323.9 mm
Wall Thickness	-	Minimum 7.1 mm
Grade	-	Minimum 359 MPa
Type	-	Electric Resistance Weld
Description	-	C.S.A. Standard Z245.1
Category	-	Cat. I, M5C
Coating	-	FBE or YJ
% SMYS	-	43.8% - Based on the above minimums

Chris Gagner

From: Kourosh Manouchehri <KManouchehri@tssa.org>
Sent: August-07-19 1:22 PM
To: Azhar Ahmed
Cc: Robert Pieta; Norm Dumouchelle; Doug Schmidt; Chris Gagner; Zora Crnojacki
Subject: [External] RE: CK Rural Project- NPS 12 Pipe Change
Attachments: RE: CK Rural Project- NPS 12 Pipe Change

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 Azhar,

My letter dated June 27, 2019 to OEB still is valid. There is no need for another letter. Change of material grade is accepted through my email dated July 25th and this email. As the pipe's manufacture is not Hyundai, I don't have any more comments.

Regards,

Kourosh Manouchehri, P.Eng., PMP | Engineer

Fuels Safety
 345 Carlingview Drive
 Toronto, Ontario M9W 6N9
 Tel: +1-416-734-3539 | Fax: +1-416-231-7525 | E-Mail: kmanouchehri@tssa.org
www.tssa.org

From: Azhar Ahmed <AAAhmed@uniongas.com>
Sent: August 7, 2019 09:42
To: Kourosh Manouchehri <KManouchehri@tssa.org>
Cc: Robert Pieta <RPieta@uniongas.com>; Norm Dumouchelle <NPDumouchelle@uniongas.com>; Doug Schmidt <DSchmidt@uniongas.com>; Chris Gagner <CGagner@uniongas.com>
Subject: RE: CK Rural Project- NPS 12 Pipe Change

Hi Kourosh. The pipe came from Evraz in Red Deer. We will be approaching OEB after you have given your okay. Would we need a letter from you approving the updated pipe specs when we reach out to OEB ?

Azhar Ahmed, P.Eng
 Pipeline Engineer

ENBRIDGE GAS, INC
 TEL: 519-436-4600 ext. 5002171 | CELL: 519-784-1674
 50 Keil Drive North, Chatham, ON N7M 5M1

enbridge.com
 Integrity. Safety. Respect.

From: Kourosh Manouchehri [<mailto:KManouchehri@tssa.org>]
Sent: July-25-19 10:14 AM

To: Azhar Ahmed
Cc: Robert Pieta; Norm Dumouchelle; Doug Schmidt; Chris Gagner
Subject: [External] RE: CK Rural Project- NPS 12 Pipe Change

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 Ahamed,

I reviewed the updated piping spec. As I see on the revised spec, only grade of the NPS 12 is changed which resulted to 43.8% SMYS stress vs 40.3%. This value is still relatively low for transmission lines. I have no comments on the change and updated our record accordingly. Could you please provide the name of selected pipe manufacture? As you probably know there are issues with one pipe manufacture and NEB issued order on that. I sent an email to my contact in Enbridge but did not get the response yet, attached email.

Please update me on the construction schedule when it is available.

Regards,

Kourosh Manouchehri, P.Eng., PMP | Engineer

Fuels Safety
345 Carlingview Drive
Toronto, Ontario M9W 6N9
Tel: +1-416-734-3539 | Fax: +1-416-231-7525 | E-Mail: kmanouchehri@tssa.org
www.tssa.org



From: Azhar Ahmed <AAAhmed@uniongas.com>

Sent: July 25, 2019 09:30

To: Kourosh Manouchehri <KManouchehri@tssa.org>

Cc: Robert Pieta <RPieta@uniongas.com>; Norm Dumouchelle <NPDumouchelle@uniongas.com>; Doug Schmidt <DSchmidt@uniongas.com>; Chris Gagner <CGagner@uniongas.com>

Subject: RE: CK Rural Project- NPS 12 Pipe Change

Hi Kourosh. I just wanted to follow up to see if you had any questions or concerns with regards to the updated pipe specification.

Azhar Ahmed, P.Eng.
Pipeline Engineer

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TEL: 519-436-4600 ext. 5002171 | CELL: 519-784-1674
50 Keil Drive North, Chatham, ON N7M 5M1

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From: Azhar Ahmed
Sent: July-17-19 11:51 AM
To: 'KManouchehri@tssa.org'

Cc: Robert Pieta; Norm Dumouchelle; Doug Schmidt

Subject: CK Rural Project- NPS 12 Pipe Change

Hi Kourosh. As discussed, attached is the updated pipe specification for the NPS 12 Chatham Kent Project. The NPS 8 part of this project is unchanged. Please let me know if you have any questions.

Azhar Ahmed, P Eng
Pipeline Engineer

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TEL: 519-436-4600 ext. 5002171 | CELL: 519-784-1674
50 Keil Drive North, Chatham, ON N7M 5M1

enbridge.com
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