

VIA Email, RESS and Courier

August 22, 2019

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ms. Walli:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (Board) File No.: EB-2018-0013
Kingsville Transmission Reinforcement Project - Request to Vary**

Please find attached a Request to Vary Form as submitted by Enbridge Gas for the Kingsville Transmission Reinforcement Project ("the Project"). The Request to Vary involves a change to the time allotted for the Project's hydrostatic test.

As stated in the pre-filed evidence for the Project, the plan was to test the proposed pipeline hydrostatically with water for a period of 24 hours. This was consistent with Union Gas's ("Union") specification at the time. Union filed the Kingsville Reinforcement application and pre-filed evidence with the Ontario Energy Board ("OEB") prior to amalgamating with Enbridge Gas Distribution to form Enbridge Gas.¹

Enbridge Gas has since reviewed its specification for hydrostatic testing and has implemented a change to the duration of test. More specifically, rather than conduct the test for 24 hours, the test period is now 8 hours. This change also adheres to the requirements of the CSA Z662 Code, specifically clause 8.7.5 Duration of Tests.

Enbridge Gas submits this change is not significant and as noted above, is permitted by Code. For these reasons, Enbridge Gas respectfully requests a timely review and approval of this request.

Please contact the undersigned if you have any questions.

Yours truly,

(Original Signed)

Joel Denomy
Technical Manager

c.c.: N. Marconi (OEB Staff)
A. Manzano (OEB Staff)

¹ Amalgamation to form Enbridge Gas Inc. effective January 1, 2019.

REQUEST TO VARY

Project Name: Kingsville Transmission Reinforcement Project

OEB File Number: EB-2018-0013

Change Request: 1

Description and Rationale for Change

Enbridge Gas Inc. ("Enbridge Gas") is proposing to use an 8-hour hydrostatic test rather than 24 hours as noted in the pre-filed evidence (Exhibit A, Tab 11, p. 6) for the Kingsville Transmission Reinforcement Project (the "Project"). The 24-hour hydrostatic test was consistent with the internal specification at the time the application for the Project was filed with the Ontario Energy Board. Following a review of the internal specification, the test duration was changed from 24 hours to 8 hours. Enbridge Gas submits this change adheres to the requirements of the CSA Z662 Code, specifically clause 8.7.5 Duration of Tests. This section allows for a variety of test durations ranging from one hour to 24 hours depending upon the site-specific circumstances. In the case of the Kingsville Project, an 8-hour hydrostatic test is permitted by the CSA Z662 Code and, is an acceptable method for testing the proposed pipeline.

Construction and Restoration Practices

No impact to construction and/or restoration practices

Environmental

No new environmental mitigation will be required

Consultation

No additional consultation required

Lands

No impact to lands

Costs

No impact to costs

Schedule

No impact to the in-service date

Attachments

No attachments required for this Request to Vary