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BY E-MAIL

August 27, 2019

Mr. Joel Denomy
Technical Manager, Regulatory Affairs
Enbridge Gas Inc.
500 Consumers Road
Willowdale, ON M2J 1P8
Joel.Denomy@enbridge.com

Dear Mr. Denomy

**Re: Enbridge Gas Inc.
Kingsville Transmission Reinforcement Project
Ontario Energy Board File Number EB-2018-0013
Request to Vary, Change Request No. 1**

The Ontario Energy Board (OEB) is in receipt of your letter dated August 22, 2019, in which Enbridge Gas Inc. (Enbridge Gas) advised the OEB of a change to the Kingsville Transmission Reinforcement Project (Project). The OEB approved the Project, subject to certain conditions of approval, by a Decision and Order dated September 20, 2018. At the time of the application, Enbridge Gas was acting as Union Gas Limited (Union Gas). Enbridge Gas Distribution Inc. and Union Gas amalgamated effective January 1, 2019, to become Enbridge Gas.

Among the OEB's conditions of approval was the following:

4. Union shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Union 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.

The change involves a reduction in the time allotted for the Project's hydrostatic test.

In its application for the Project, Enbridge Gas stated:

All of the design, installation and testing of the proposed pipeline and station modifications will be completed in accordance with the requirements of Ontario Regulation 210/01, Oil and Gas Pipeline Systems under the *Technical Standards and Safety Act, 2000*. This regulation governs the installation of pipelines in the Province of Ontario. The design meets or exceeds the requirements of current CSA Z662-15 Standard in accordance with the Code Adoption document under the Ontario Regulations.¹

Enbridge Gas indicated that the hydrostatic test would be 24 hours in duration. This duration was consistent with Union Gas' specifications at the time.

In its August 22, 2019 change request, Enbridge Gas advised that the amalgamated utility has reviewed its specifications for hydrostatic testing as they relate to the requirements of the CSA Z662 standard, and 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. Enbridge Gas asserted that in the case of the Project, an 8 hour hydrostatic test is permitted by the CSA Z662 standard and is an acceptable method for testing the proposed pipeline.

Enbridge Gas submits that the change will not modify the project's originally proposed construction or restoration methods, environmental mitigation measures, stakeholder consultations, land requirements, project cost, or project schedule.

As the Manager, Supply and Infrastructure Applications, I have been delegated, under section 6 of the *Ontario Energy Board Act, 1998*, the authority of the OEB to determine whether Enbridge Gas' proposal will result in material changes to the natural gas pipeline in respect of which leave to construct was granted by the OEB in the EB-2018-0013 proceeding. I have been further granted the authority to approve any changes that I have concluded are not material.

¹ EB-2018-0013, Application, Exhibit A, Tab 11, page 1

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Based on my review of the information provided, I find that the change proposed by Enbridge Gas is not material. I hereby approve the proposed change.

Yours truly,

Original signed by

Nancy Marconi
Manager, Supply and Infrastructure Applications