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September 18, 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.2, dated September 11, 2019, enclosed please find Interrogatory Responses of Enbridge Gas.

For ease of reference, the interrogatories have been re-numbered to be in order of sequence with the previously filed interrogatories.

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)

Question:

What is the estimated time Enbridge Gas would require to file an application under section 90 of the OEB Act for approval of all phases of the St. Laurent Project (i.e., Phase Two to Phase Four)?

Response

The table below provides Enbridge Gas' estimate (as of September 2019) of the time it would take to develop an application under section 90 of the OEB Act for approval of Phases 2 to 4 of the St. Laurent Project. Based on this timeline Enbridge Gas expects an application would not include a sufficiency letter on the adequacy of indigenous consultation. This estimate assumes that the immediate application (i.e. the EB-2019-0006 application) is withdrawn and included in a separate application that includes Phases 2 to 4.

Note that the timeline presented here does not include any contingency for delays in any of the steps required to develop, submit and process a leave to construct application.

2019	October	RFQ Process and approval - 1 month
	November	Kickoff Meeting Send out MOENDM DTC Letter - compilation/submission - 2 weeks
	December	MENDM DTC Letter response received (5 week turnaround from submission) 2 week shutdown due to holidays
2020	January	Send Notice to newspapers (lead time) Newspaper publication/letter mailout
	February	Open House 30 day comment period begins (from date of open house) Indigenous community involvement (presentation) Stage 1 AA starts/completed
	March	30 day comment period ends ER drafted/finalized and submitted to OPCC OPCC Review of ER (42 day review period begins) <i>(include CAs, upper/lower tier municipalities and FNs in ER distribution)</i>

	April	OPCC Review complete Update ER based on comments from OPCC and reviewers
	May	Review and finalize LTC application Stage 2 AA fieldwork (weather dependant) Terrestrial Fieldwork (if required)
	June	LTC application submission LTC Process begins (interrogatories and review, etc.)(4-6 months)
	July	Stage 2 AA report submission to MTCS LTC Process (interrogatories and review, etc.)
	August	Clearance Letter received on Stage 2 AA from MTCS LTC Process (interrogatories and review, etc.)
	September	LTC Process (interrogatories and review, etc.)
	October	LTC Process (interrogatories and review, etc.)
	November	LTC Process (interrogatories and review, etc.)
	December	LTC Process (interrogatories and review, etc.)
2021	January	Board Decision
	Spring	Construction mobilization

Based on the schedule outlined above Enbridge Gas would be able to begin construction on Phase 3 in the spring of 2021. Construction on Phase 4 would begin in 2022 assuming the required easements and permit approvals are obtained in time to begin construction. Phase 2 construction would be pushed back to 2024 due to road moratoriums. As a result the abandonment of the existing NPS 12 XHP pipeline would also be pushed back to 2024.

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

Question:

Please add a column to the table provided in this Procedural Order describing the phases of the St. Laurent Project that indicates if the OEB's approval is required (and under which section of the OEB Act) for each project listed. Please indicate the planned date of filing these applications with the OEB if they are not provided on a consolidated basis.

Response

Please see the response to Board Staff interrogatory #9 at Exhibit I.STAFF.9.

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

Question:

Please provide a map of the New NPS 12 Pipeline.

Response

For ease of reference and explanation an updated version of the Table provided in the response to Board Staff interrogatory #3 a), at Exhibit I.STAFF.3, is being provided in this response as Attachment 1. The maps provided below should be read in conjunction with the updated table. Note that the table was prepared based on current estimates and a determination of whether or not an application for leave to construct is required may change based on updated cost estimates as the Project progress through each phase. Enbridge Gas currently expects to file with the Board two more applications for the Project for leave to construct based on these current estimates. One application will be comprised of those elements of Phase 3 requiring leave of the Board (subject to the aforementioned caveat regarding estimates). The second application will be for Phase 4 of the Project.

Attachments 2 to 4 of this response provide maps showing the existing facilities and the proposed new facilities and abandonments that comprise the overall NPS 12 St. Laurent Project (the "Project").

Attachment 2 (Map #1) shows the existing NPS 12 pipeline and the proposed NPS 12 pipeline. Attachment 1 also shows the segments of the existing NPS 12 pipeline that will be abandoned and the year in which that abandonment will take place. The year of abandonment is tied to each phase of the Project.

Attachment 3 (Map #2) shows the existing facilities that will be replaced in each phase of the Project, including timing for each phase.

Attachment 4 (Map #3) shows the proposed facilities for each phase of the Project, including timing for each phase and the facilities to be abandoned.

Additional explanation and narrative for each of the maps and Project phases is provided under separate headings below. The response to Board Staff interrogatory #11 at Exhibit I.STAFF.11 provides the rationale for why the Project was separated into phases.

Map 1

This map shows the existing NPS 12 XHP pipeline, the proposed NPS 12 XHP pipeline and the segments of the existing NPS 12 XHP pipeline that will ultimately be abandoned once the Project is completed. Each of the shaded areas on the map corresponds to a segment of the existing NPS 12 XHP pipeline that will be abandoned when certain phases of the Project are completed.

As noted in the response to Board Staff interrogatory #3 c) at Exhibit I.STAFF.3 the existing NPS 12 XHP pipeline north of the St. Laurent control station has a single feed from the St. Laurent control station. Therefore any abandonment of the existing NPS 12 XHP pipeline north of the St. Laurent control station cannot occur until the new NPS 12 XHP pipeline is constructed and in service. Consequently, based on the current Project schedule, the existing NPS 12 XHP pipeline north of the St. Laurent control station cannot be abandoned until the new NPS 12 XHP pipeline is constructed in 2022 (Phase 4 of the Project).

Additionally, as indicated in the table above, there are a few hundred customers that are currently served off of the existing NPS 12 XHP pipeline that have to be transferred to the IP system prior to abandoning the existing NPS 12 XHP pipeline. The customers currently attached to the existing NPS 12 XHP pipeline were connected to this pipeline because at the time they requested service this was the only pipeline available for Enbridge Gas to connect them to. The reason for transferring these customers is twofold: First, for engineering and safety reasons Enbridge Gas prefers not to serve customers directly off of any XHP pipeline (unless their requirements dictate otherwise). From an engineering and safety perspective serving customers off of an XHP pipeline creates certain risks such as increased risk of corrosion due to multiple service connections which can impact field applied coatings, increased risk of third party damages due to multiple service connections, and risk to service delivery pressures (for example, higher pressure than required being distributed to a general service customer. Second, routing for the new NPS 12 XHP pipeline will not allow Enbridge Gas to reconnect these customers to the new NPS 12 XHP pipeline.

Throughout all of the phases of the Project only existing facilities will be abandoned. New facilities will not be constructed and then abandoned at a later date as part of the Project.

Map 2

This map shows the existing facilities including those facilities that are currently served off of the existing NPS 12 XHP pipeline. For ease of reference this map also shows (in each box) the new facilities that will be constructed and the facilities that will be abandoned (including the timing of installation of the new facilities and the timing of

abandonment of the existing facilities). The facilities shown in this map are the facilities that will be abandoned when the new facilities are constructed and in service. Note that in Phases 2 through 3 all customers (except for one in Phase 4) will be transferred off of the XHP system to the IP system.

Map 3

This map shows the proposed facilities for the Project. For ease of reference this map also shows (in each box) the new facilities that will be constructed and the facilities that will be abandoned (including the timing of installation of the new facilities and the timing of abandonment of the existing facilities). These are the facilities that will allow Enbridge Gas to transfer customers off of the XHP system to the IP system. These are also the facilities that will allow Enbridge Gas to abandon the existing NPS 12 XHP pipeline once the new NPS 12 XHP pipeline is in service in 2022.

Phase	Project Name	Project Start	In-service date	Installed	Customers	Proposed Abandonment	Year Abandoned	OEB Approval Required?	Estimated Filing Date
1	Avenue O Pressure Increase from 30 psi to 45 psi	May 29/18	May 29/18	n/a	29	n/a	n/a	No	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 XHP 1199 m - 2" ST XHP	2019	No	n/a
2	Plastic - St - Laurent (Donald to Montreal)	Sept 3/19	Dec 31/19*	1726 m - 6" PE 11 m - 2" PE	66	1.7km - 12" SC XHP	2022**	Yes - Section 90 (1) (b)	May-19
3	Plastic - Lower Section 1	May 1/20	Dec 31/20	1.9 km - 4" PE	186	1.9 km -4" SC XHP 148.8 m - 12" SC XHP	2020	No	n/a
3	Plastic - Lower Section 2	May 1/21	Dec 31/21	1.1 km - 4" PE	44	565 m - 4" SC XHP 371 m - 12" SC XHP	2021	Yes - Section 90 (1) (b)***	Jul-20
3	Plastic - Coventry/Oglivie	May 1/21	Dec 31/21	1.5 km - 6" PE	14	1.5 km - 6" SC XHP	2021	No	n/a
3	Plastic - St Laurent (Donald to Hwy 417)	May 1/21	Dec 31/21	400 m - 6" PE 261 m - 2" PE	45	661m - 12"SC XHP	2022**	Yes - Section 90 (1) (b)***	Jul-20
3	Plastic - St Laurent (Montreal to Rockcliffe)	May 1/21	Dec 31/21	3.9 km - 6" PE	133	3.9km - 12"SC XHP	2022**	Yes - Section 90 (1) (b)***	Jul-20
4	Steel - Queen Mary	April 1/22	Dec 31/22	3.5 km - 12" ST	1	*****		Yes - Section 90 (1) (b)	May-20
4	Steel - Aviation Parkway	April 1/22	Dec 31/22	8.0 km - 12" ST		*****		Yes - Section 90 (1) (b)	May-20

*Assumes leave to construct is granted in September 2019

**Abandonment will take place in 2022 when Phase 4 is completed.

*** Cost estimates to be refined. May or may not result in an application for leave to construct.

**** Phase 4 Queen Mary once in service allows for abandonment of 2.5km of existing NPS 12 XHP pipeline (This includes the abandonment of 1.2km of existing NPS 12 XHP pipeline made possible by the installation of the Phase 2 Tremblay facilities).

***** Phase 5 Aviation Parkway once in service allows for abandonment of 9.5km of existing NPS 12 XHP pipeline (This includes the abandonment of 3.9km of existing NPS 12 XHP pipeline made possible by the installation of the Phase 3 St. Laurent Montreal to Rockcliffe facilities, the abandonment of 1.7km of existing NPS 12 XHP pipeline made possible by the installation of the Phase 3 St. Laurent Donald to Montreal facilities, and the abandonment of 661m of existing NPS 12 XHP pipeline made possible by the installation of the Phase 3 Donald to highway 417 facilities).

MAP 1

OTTAWA RIVER

NORTH

ROCKCLIFFE
CONTROL STN

ROCKCLIFFE PKWY

ST LAURENT BLVD

MONTREAL RD

RIDEAU RIVER

VANIER PWKY

DONALD ST

QUEEN MARY ST

CUMMINGS AVE

AVIATION PARKWAY

OGILVIE RD

ST LAURENT
CONTROL STN

HIGHWAY 417

MICHAEL ST

HIGHWAY 417

INNES RD

ST LAURENT BLVD

LEGEND

- PROPOSED NPS 12 XHP GAS MAIN INSTALLATION 2022
- EXISTING NPS 12 XHP GAS MAIN
- PROPOSED ABANDONMENT NPS 12 XHP 2022 Approx 9.5 km
- PROPOSED ABANDONMENT NPS 12 XHP 2022 Approx 2.5 km
- PROPOSED ABANDONMENT NPS 12 XHP 2021 Approx. 370 m
- PROPOSED ABANDONMENT NPS 12 XHP 2020 Approx. 150 m

ENBRIDGE GAS DISTRIBUTION
ST LAURENT BLVD
NPS 12 GAS MAIN REPLACEMENT

0 500 1000 1500 2000 2500m

LEGEND - Phases (Shaded Area)

MAP 2

Filed: 2019-09-18
EB-2019-0006
Exhibit I.STAFF.9
Attachment 3
Page 1 of 1

- Phase 2 Tremblay IP
- Phase 2 St Laurent - Donald to Montreal IP
- Phase 3 Lower Section 1 IP
- Phase 3 Lower Section 2 IP
- Phase 3 Coventry/Ogilvie IP
- Phase 3 St Laurent - Donald to Hwy 417 IP
- Phase 3 St Laurent - Montreal to Rockcliffe IP

ROCKCLIFFE
CONTROL STN

OTTAWA RIVER

ROCKCLIFFE PKWY

NORTH

Phase 3 - St Laurent - Montreal to Rockcliffe
Install (2021) : 3.9 km - 6" PE
261 m - 2" PE
Abandon: 3.9 km - 12" SC (2022)
261 m - 2" PE (2021)

Phase 2 - St Laurent - Donald to Montreal
Install (2019) : 1726 m - 6" PE
11 m - 2" PE
Abandon: 1726 m - 12" SC (2022)

Phase 3 - St Laurent - Donald to Hwy 417
Install (2021) : 400 m - 6" PE
261 m - 2" PE
Abandon: 661 m - 12" SC (2022)

Phase 3 - Coventry/Ogilvie
Install (2021) : 1.5 km - 6" PE
Abandon: 1.5 km - 6" SC (2021)

Phase 2 - Tremblay
Install (2019) : 123 m - 8" PE
1282 m - 6" PE
142 m 4" PE
1841 m 2" PE
Abandon: 758 m - 1" SC (2019)
18 m - 1¼ SC (2019)
approx 1.2 km - 12" SC (2022)

Phase 3 - Lower Section 2
Install (2021) : 1.1 km - 4" PE
Abandon: 565 m - 4" SC (2021)
371 m - 12" SC (2021)

Phase 3 - Lower Section 1
Install (2020) : 1.9 km - 4" PE
Abandon: 1.9 km - 4" SC (2020)
149 m - 12" SC (2020)

LEGEND

- EXISTING NPS 16 GAS MAIN
- EXISTING NPS 12 GAS MAIN
- EXISTING NPS 8 GAS MAIN
- EXISTING NPS 6 GAS MAIN
- EXISTING NPS 4 GAS MAIN
- EXISTING NPS 2 GAS MAIN
- EXISTING NPS 1 1/4 GAS MAIN
- EXISTING NPS 1 GAS MAIN

ENBRIDGE GAS DISTRIBUTION
ST LAURENT BLVD
NPS 12 GAS MAIN REPLACEMENT



LEGEND - Phases (Shaded Area)

- Phase 2 Tremblay IP
- Phase 2 St Laurent - Donald to Montreal IP
- Phase 3 Lower Section 1 IP
- Phase 3 Lower Section 2 IP
- Phase 3 Coventry/Ogilvie IP
- Phase 3 St Laurent - Donald to Hwy 417 IP
- Phase 3 St Laurent - Montreal to Rockcliffe IP
- Phase 4 NPS 12 XHP Queen Mary
- Phase 4 NPS 12 XHP Aviation Pkwy

MAP 3

Filed: 2019-09-18
EB-2019-0006
Exhibit I.STAFF.9
Attachment 4
Page 1 of 7

NORTH

ROCKCLIFFE
CONTROL STN

OTTAWA RIVER

ROCKCLIFFE PKWY

SANDRIDGE RD

Phase 3 - St Laurent - Montreal to Rockcliffe
Install (2021) : 3.9 km - 6" PE
261 m - 2" PE
Abandon: 3.9 km - 12" SC (2022)¹
261 m - 2" PE (2021)

Phase 4 - XHP Aviation Pkwy
Install (2022) : 8.0 km - 12" ST
Abandon: approx. 9.5 km - 12" SC (2022)¹
including abandonments from projects
Phase 3 St Laurent Montreal to Rockcliffe,
Montreal to Donald and Donald to Hwy 417

Phase 2 - St Laurent - Donald to Montreal
Install (2019) : 1726 m - 6" PE
11 m - 2" PE
Abandon: 1726 m - 12" SC (2022)¹

Phase 4 - XHP Queen Mary
Install (2022) : 3.5 km - 12" ST
Abandon: approx. 2.5 km - 12" SC (2022)²
including abandonment from Tremblay

Phase 3 - St Laurent - Donald to Hwy 417
Install (2021) : 400 m - 6" PE
261 m - 2" PE
Abandon: 661 m - 12" SC (2022)¹

Phase 3 - Coventry/Ogilvie
Install (2021) : 1.5 km - 6" PE
Abandon: 1.5 km - 6" SC (2021)

Phase 2 - Tremblay
Install (2019) : 123 m - 8" PE
1282 m - 6" PE
142 m 4" PE
1841 m 2" PE
Abandon: 758 m - 1" SC (2019)
18 m - 1¼ SC (2019)
approx 1.2 km - 12" SC (2022)²

Phase 3 - Lower Section 2
Install (2021) : 1.1 km - 4" PE
Abandon: 565 m - 4" SC (2021)
371 m - 12" SC (2021)

Phase 3 - Lower Section 1
Install (2020) : 1.9 km - 4" PE
Abandon: 1.9 km - 4" SC (2020)
149 m - 12" SC (2020)

LEGEND

- PROPOSED NPS 12 GAS MAIN
- PROPOSED NPS 8 GAS MAIN
- PROPOSED NPS 6 GAS MAIN
- PROPOSED NPS 4 GAS MAIN
- PROPOSED NPS 2 GAS MAIN

ENBRIDGE GAS DISTRIBUTION
ST LAURENT BLVD
NPS 12 GAS MAIN REPLACEMENT

0 500 1000 1500 2000 2500m

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

Question:

Please provide a map of all new segments planned to be constructed and in service by 2022 when the New NPS 12 Pipeline is completed.

Response

Please see the response to Board Staff interrogatory #9 at Exhibit I.STAFF.9.

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

Question:

Please explain how Enbridge Gas determined which parts of the project were in each phase.

Response

The NPS 12 St. Laurent Project ("Project") was divided into phases due to the complexity of the Project. Construction of the Project in its entirety (i.e. all phases) inclusive of the pressure elevation (Phase 1), installation of new facilities (Phases 2 through 4) and the transfer of approximately 700 services from the XHP system to the IP system (Phases 2 to 4, the majority of transfers will occur in Phases 2 and 3) to the new pipelines, could not be completed concurrently.

Through consultation with the City of Ottawa and other utilities the project was initially identified as requiring 3 phases to execute. Based on subsequent feedback and discussions with the City of Ottawa and other utilities, the Project was designed to be completed in four phases. The current four phase approach (identified in the response to Board Staff interrogatory #3 a) at Exhibit I.STAFF.3) incorporates additional information from the City of Ottawa and other utilities not known at the time the aforementioned three phase approach was developed. The current approach incorporates updated information from co-ordination with other utilities, municipal moratoriums, resource management, and information from the Forecast Capital Construction 5 year Plan for the City of Ottawa.

A phased approach was adopted for the Project for two primary reasons: the need to replace the existing NPS 12 XHP pipeline and coordination with the City of Ottawa and other utilities. Resourcing must also be taken into account when planning a project of this size and scope.

Replacement of the existing NPS 12 XHP pipeline cannot occur until those customers on the XHP system are transferred to the IP system. The transfer of customers from the XHP system to the IP system is accomplished by completing Phases 2 and 3 first (with the exception of one customer in Phase 4). The existing NPS 12 XHP pipeline cannot be abandoned until Phase 4 is constructed and in service.

In terms of coordination Phase 2 and Phase 3 are required to accelerate Enbridge Gas' construction of the proposed IP gas pipelines and associated customer transfers from XHP to IP in order to coordinate and manage conflicts with the proposed City of Ottawa

Capital Construction work and corresponding moratoriums on specific roads.

Tremblay Road (and the installation of pipelines on the Avenues running off of Tremblay Road) was placed in Phase 2 in order to accommodate road resurfacing in 2019 and to coordinate with the installation of sewer, water and road resurfacing scheduled for the Avenues in 2019 and 2020. A road moratorium will be placed in effect in 2020 preventing the construction of these facilities until 2024.

The immediate application, St. Laurent Boulevard, was placed in Phase 2 in order to accommodate road resurfacing on St. Laurent Boulevard from Montreal to Donald Street in May of 2020 and road resurfacing currently in progress on Montreal Road. which will have a three-year road moratorium to be put into effect in 2020 preventing the construction of these facilities until 2024.

A road moratorium is currently in place on St. Laurent Boulevard from Lancaster Road to Innes Road Until October 2020. In order to avoid winter construction Phase 3 – Lower Section 2 was placed in Phase 3 and scheduled to begin construction in 2021. Another road moratorium is currently in place on Sandridge Road until July 2019. This moratorium impacts Phase 3 St. Laurent Montreal to Rockcliffe. For resource management (contractor and crew availability) this project was placed in Phase 3 and scheduled to commence construction with the other components of Phase 3 in 2021. For Phase 4 there is a moratorium on St. Laurent Boulevard north of Industrial Road until Oct 31, 2021 and on Michaels Road at the railroad crossing until Dec 16, 2022 which will require Enbridge Gas directional drill under the railway and paved road.

From a resourcing perspective the Project was Phased in order accommodate the availability of resources (employees, contractors, work crews, fitters etc...). Phasing of the Project enables Enbridge Gas to manage and allocate its resources not only for the Project but for other gas distribution work that is ongoing in the City of Ottawa.

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

Question:

Please provide a map of the existing and/or new pipeline segments that are part of the St. Laurent Project and are planned to be abandoned. Indicate the years of planned abandonment.

Response

Please see the response to Board Staff interrogatory #9 at Exhibit I.STAFF.9.

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

Question:

If Enbridge Gas does not complete construction of the Proposed Pipeline prior to May 2020, are there options available to still achieve the 2022 in-service date for the New NPS 12 Pipeline? For example, could the installation of pipeline be coordinated with the City of Ottawa's road work in spring 2020?

Response

As indicated in the pre-filed evidence at Exhibit B, Tab 1, Schedule 1, page 2, the existing NPS12 XHP pipeline has known integrity issues due to its age and location. The objective of the overall St. Laurent Pipeline project is to abandon the existing NPS 12 XHP pipeline in order to eliminate the risks associated with it. Any delay in Phases 2 and/or 3 will cause the overall St. Laurent Pipeline project to be delayed and will push back completion of the project to at least 2024 which is the year when the road moratoriums end. In other words abandonment of the existing NPS 12 XHP pipeline can only be achieved once all phases of the overall St. Laurent Pipeline project have been completed.

The rationale for why the overall St. Laurent Pipeline project was divided into phases is discussed in the response to Board Staff interrogatory #11 at Exhibit I.STAFF.11. Achieving an in-service date of 2022 for the new NPS 12 XHP pipeline is a necessary step towards meeting the objective of the St. Laurent Pipeline project.

The City of Ottawa has been very clear that it does not want Enbridge Gas to install any works along newly paved roads. Enbridge Gas recently contacted the City of Ottawa to explore the possibility of coordinating installation of the proposed pipeline in the spring of 2020 by deferring road work until the proposed pipeline is constructed. The City of Ottawa responded that it requires the proposed pipeline to be installed by May 2020 at this time.

While it would be possible for Enbridge Gas to construct the new NPS 12 XHP pipeline and achieve an in-service date of 2022 for that pipeline if Phases 2 and/or 3 are delayed, there are several issues with this approach. First, this would mean that the existing NPS 12 XHP pipeline will remain in service until at least 2024 because Enbridge Gas would not be able to abandon it until Phases 2 and/or 3 are completed (after the road moratoriums are lifted in 2023). Should this occur the objective of the overall St. Laurent Pipeline project would not be met. The Existing NPS 12 XHP pipeline would remain in service for at least an additional two years and the risks

associated with that pipeline would remain for at least an additional two years. Second, Enbridge Gas would be operating and maintaining two NPS 12 XHP pipelines (where only one is required) for at least an additional two years. This would increase operating and maintenance costs for at least an additional two years. Third, overall project costs would increase as Enbridge Gas would have to enter newly paved roads, install Phases 2 and 3 and then restore the roads to their original condition. Coordination with the City of Ottawa and other utilities to date resulted in the phasing of the overall St. Laurent Project which avoids this.

Enbridge Gas has explored several mitigation measures to keep timing on track for both the proposed pipeline and the overall St. Laurent Pipeline project.

In terms of the proposed pipeline Enbridge Gas moved the proposed pipeline forward in the overall St. Laurent Pipeline project schedule in order to accommodate the road work being completed by the City of Ottawa. Enbridge Gas has contemplated requesting approval to break the road moratorium in order to construct the proposed pipeline. However, as indicated above the City of Ottawa requires the proposed pipeline to be constructed as scheduled by May 2020. Finally, the option of adding more crews was contemplated assuming a construction start in the spring of 2020. However, due to road congestion and limited working space it was determined that a May 2020 in-service date for the proposed pipeline would not be possible even with additional crews. Additional crews would also increase project costs.

In terms of the overall St. Laurent Pipeline project Enbridge Gas has worked with the City of Ottawa, other utilities its contractor to coordinate and develop the phasing and timing of the overall project for 2 years and will continue to do so throughout the life of the project. Enbridge Gas has worked with its contractor to develop several scenarios in which construction for the overall St. Laurent Pipeline project (including the proposed pipeline) is completed according to schedule.

In summary, Enbridge Gas believes that there are no viable options that would achieve an in-service date of 2022 for the overall St. Laurent Pipeline project other than the phasing and timelines currently in place. The overall objective to abandon the existing NPS 12 XHP by 2022 will be put at risk unless Enbridge Gas receives leave to construct the proposed pipeline as soon as possible in order to enable construction commencement in 2019.

It is Enbridge Gas' position that any delays to the overall St. Laurent Pipeline project are not in the public interest. Delays to any phases of the project will not eliminate the risk associated with the existing NPS 12 XHP pipeline and will increase the cost of providing gas distribution service to customers safely, reliably and cost effectively.

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

Question:

What are the implications of not completing the proposed pipeline by May 2020 on the overall St. Laurent Project, and what actions has Enbridge Gas considered to mitigate these impacts?

Response

Please see the response to Board Staff interrogatory #13 at Exhibit I.STAFF.13.

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

Question:

What are the implications for Enbridge Gas customers, and more broadly from a public interest perspective, of a delay to the planned 2022 in-service date for the overall St. Laurent Project? What actions has Enbridge Gas considered to mitigate these impacts?

Response

Please see the response to Board Staff interrogatory #13 at Exhibit I.STAFF.13.

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

Question:

What is the current status of the Phase 2 Archaeological Report?

Response

The Stage 2 Archaeological Assessment for the St. Laurent Pipeline Project was submitted to the Ministry of Tourism, Culture and Sport on August 30, 2019. On September 6, 2019 Enbridge Gas received confirmation that the Stage 2 Archaeological Assessment was entered into the Ontario Public Register of Archaeological Reports. A copy of this confirmation is included in Attachment 1 to this response.

Ministry of Tourism, Culture and Sport

Archaeology Programs Unit
Programs and Services Branch
Culture Division
401 Bay Street, Suite 1700
Toronto ON M7A 0A7
Archaeology@ontario.ca

Ministère du Tourisme, de la Culture et du Sport

Unité des programmes d'archéologie
Direction des programmes et des services
Division de culture
401, rue Bay, bureau 1700
Toronto ON M7A 0A7
Archaeology@ontario.ca



Sep 6, 2019

Matthew Beaudoin (P324)
Timmins Martelle Heritage Consultants Inc.
1600 Attawandaron London ON N6G 3M6

RE: Entry into the Ontario Public Register of Archaeological Reports: Archaeological Assessment Report Entitled, "Stage 2 Archaeological Assessment St. Laurent Pipeline Project Enbridge Gas Inc. Part of Lots 5, 6, 7, and 8, Junction Gore and Part of Lot 26, Concession 1 on Ottawa River Geographic Township of Gloucester Carleton County City of Ottawa, Ontario", Dated Aug 30, 2019, Filed with MTCS Toronto Office on N/A, MTCS Project Information Form Number P324-0396-2019, MTCS File Number 0010335

Dear Dr. Beaudoin:

The above-mentioned report, which has been submitted to this ministry as a condition of licensing in accordance with Part VI of the *Ontario Heritage Act*, R.S.O. 1990, c 0.18, has been entered into the Ontario Public Register of Archaeological Reports without technical review.¹

Please note that the ministry makes no representation or warranty as to the completeness, accuracy or quality of reports in the register.

Should you require further information, please do not hesitate to send your inquiry to Archaeology@Ontario.ca

cc. Archaeology Licensing Officer
Christie Cestra, Dillon Consulting Limited
Joe Muraca, Dillon Consulting Limited

¹In no way will the ministry be liable for any harm, damages, costs, expenses, losses, claims or actions that may result: (a) if the Report(s) or its recommendations are discovered to be inaccurate, incomplete, misleading or fraudulent; or (b) from the issuance of this letter. Further measures may need to be taken in the event that additional artifacts or archaeological sites are identified or the Report(s) is otherwise found to be inaccurate, incomplete, misleading or fraudulent.

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

Question:

Has there been further communications from the Ontario Pipeline Coordinating Committee? If so, provide these communications, and any other communications that have been received to date from any government ministry.

Response

Enbridge Gas notes that in Procedural Order No. 2 the Board indicated that no official communication has been provided by the Ministry of Environment, Conservation and Parks regarding the Proposed Project. This is incorrect. In response to Board Staff interrogatory #4 at Exhibit I.STAFF.4, Board Staff requested that Enbridge Gas provide, in tabular format, all comments that Enbridge Gas had received as part of the OPCC review process since May 6, 2019. In response to that interrogatory, Enbridge Gas provided a summary, in tabular format, of a comment provided by the Ministry of Environment, Conservation and Parks as requested. A copy of the official communication from the Ministry of Environment, Conservation and Parks is included as Attachment 1 to this response.

There have been no further communications from the Ontario Pipeline Coordinating Committee or any other communications that have been received to date from any government ministry. An updated consultation log for Agency Correspondence related to the Project can be found in Attachment 2 to this response. This log is current as of September 2019.

**Ministry of the
Environment,
Conservation and Parks**
Eastern Region
1259 Gardiners Road, Unit 3
Kingston ON K7P 3J6
Phone: 613.549.4000
or 1.800.267.0974

**Ministère de l'Environnement,
de la Protection de la nature
et des Parcs**
Région de l'Est
1259, rue Gardiners, unité 3
Kingston (Ontario) K7P 3J6
Tél: 613 549-4000
ou 1 800 267-0974



By email only

May 21, 2019

Enbridge Gas Inc.

Attention: Tanya Turk, Environmental Adviser
tanya.turk@enbridge.com

Dear Ms. Turk:

Re: Proposed St. Laurent Pipeline Project, City of Ottawa, Enbridge Gas Inc.

Thank you for providing the Environmental Report (ER) for the above project, dated April 2018, and prepared by Dillon Consulting. I have reviewed the report and have no concerns.

The project involves construction of a gas pipeline for approximately 1.7 km on the north side of St. Laurent Boulevard between Donald Street and Montreal Road, in the City of Ottawa. The work will occur in the road right-of-way to minimize potential impacts. The ER indicates that the study conforms to the Ontario Energy Board's *Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario*, and that construction will be in accordance with the mitigation measures in the ER and Enbridge's *Construction and Maintenance Manual*. The ER recommends that a qualified Environmental Inspector be hired to be present during construction, to inspect the mitigation measures and respond to environmental issues.

Table 1 includes a very brief list of permits and approvals required for the project. Although it does not reference a requirement to obtain a Permit To Take water from this Ministry, or register on the Environmental Activity and Sector Registry (EASR), this requirement is recognized in Table 9 under Groundwater.

The ER indicates there are no surface water courses or bodies in the study area. The area is serviced with municipal piped water and sewage services.

The ER states that the new pipeline will be pressure tested with nitrogen gas.

Mitigation measures proposed in sections 5, 7 and 9 of the ER include:

- Treatment of water from construction sites,
- Spills response and reporting measures,
- Storing contaminants in contained storage areas away from drainage features,
- Contacting MECP's Spills Action Centre should a spill occur,
- Controlling dust using water or environmental-friendly suppressants,
- Equipping vehicles with emission controls, limiting idling and limiting construction during high wind events,
- Carrying out construction in accordance with municipal noise bylaws,
- Noise control measures for vehicles,
- Monitoring areas susceptible to vibration damage and providing compensation for property damage,
- Disposing of waste in accordance with applicable legislation,
- Safe handling and disposal of contaminated soil encountered during construction, including additional subsurface investigations and testing for waste classification,
- Appropriate spill containment and hazardous material and response training for contractors and construction crews,
- Developing a contingency plan for accidental spills,
- Monitoring of impacts and effectiveness of mitigation measures,
- Logging complaints during construction and actions taken in response.

In summary, we have no concerns with the proposed project and the ER. If you have questions or concerns about the above comments, please contact me at (613) 540-6852 or vicki.mitchell@ontario.ca.

Yours Truly,



Vicki Mitchell
Environmental Assessment Coordinator
Eastern Region

ec: Whitney Moore, Dillon Consulting Limited, StLaurentEA@dillon.ca

Charlie Primeau, MECP

Agency Correspondence - Federal						
Date of Contact (2019)	Name	Comment	Date of Response	Response and Issue Resolution (if applicable)	Follow-Up Required	Outstanding Issues
February 21	N/A	Dillon circulated the agency stakeholder letter providing information about the project with the Notice and project location map attached to all federal contacts in the Stakeholder Contact List.	N/A	N/A	N	N
February 21	N/A	Bounce-back received from EACoordination_ON@aandc-aandc.gc.ca ;	February 22	Sent letter to Indigenous Services Canada via regular mail.	N	N
February 21	Fisheries and Oceans Canada	Received confirmation of email receipt.	N/A	N/A	N	N
February 21	Sarah Rimbach	Received confirmation of receipt of email from MPP Nathalie Des Rosiers office.	N/A	N/A	N	N
February 27	Denise Fell Environment Canada	Inquired as to whether the project crossed federal lands.	February 27	Responded confirming the project does not cross federal lands. Ms. Fell responded on Feb 28 confirming that ECCC does not have any questions about the project at this time.	N	N
February 27	Transport Canada	Provided a response stating the Transport Canada does not require receipt of all individual or Class EA related notifications and requested that project proponents self-assess their projects using the criteria provided in their email.	N/A	N/A	N	N
March 20	Jeremy Schultz Canadian Environmental Assessment Agency	Received a letter requesting we review the regulations to confirm applicability of the project and if the project is not on schedule 1 of the Regulations or is not subject to CEAA 2012, to be removed from the distribution list.	N/A	N/A	N	N

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Agency Correspondence - Provincial						
Date of Contact (2019)	Name	Comment	Date of Response	Response and Issue Resolution (if applicable)	Follow-Up Required	Outstanding Issues
February 21	N/A	Dillon circulated the agency stakeholder letter providing information about the project with the Notice and project location map attached to all provincial contacts in the Stakeholder Contact List.	N/A	N/A	N	N
February 21	Infrastructure Ontario	Received bounce-back from Lisa Lyslick stating she would be away on mat leave until September 2019. Her email response notes to direct inquiries to Frank Dieterman.	N/A	Forwarded letter to Frank Dieterman.	N	N
February 22	Alain Nadeau Ministry of Transportation	Received email stating that he would be the MTO representative for this project (instead of Marek Wiesek).	N/A	Added contact to stakeholder list.	N	N
February 22	Zora Crnojacki Ontario Energy Board	Bounce-back received from Ms. Crnojacki's email address.	N/A	Re-sent the stakeholder letter and Notice to the OPCC chair.	Y	N
March 5	Olivia Matthews Ministry of Transportation	Ms. Matthews thanked us for circulating the Notice to MTO and indicated they had no interest in the work and can be taken off the mailing list for future circulation.	N/A	N/A	N	N
March 7	Mary Dillon Ministry of Natural Resources and Forestry	Provided an email with resources for proponents to check whether there may be any environmental impacts and to contact MNRF should we have any further questions related to MNRF interests.	N/A	N/A	N	N
March 12	Liam Lonergan OEB Consumer Relations	Received an email stating that the letter had been sent to the wrong contact and should be Ms. Crnojacki. Her new email address was provided.	N/A	Added updated email to stakeholder list.	Y	N
March 18	N/A	Dillon circulated the new Notice to all provincial agency contacts.	N/A	N/A	N	N

Agency Correspondence - Provincial						
Date of Contact (2019)	Name	Comment	Date of Response	Response and Issue Resolution (if applicable)	Follow-Up Required	Outstanding Issues
March 18	Kimberly Livingstone Ministry of Tourism, Culture and Sport	Provided a letter detailing the process to check for cultural and archaeological resources.	N/A	N/A	N	N
March 20	Jamie Batchelor Rideau Valley Conservation Authority	Received an email from RVCA stating that they had no comments related to the CA's mandate or interest.	March 20	Thanked them for their response.	N	N
April 10	Vicki Mitchell Ministry of Environment, Parks and Conservation	Received preliminary comments from MECP via email.	April 15	EGI responded, providing the list of MECP representatives that had been listed in the notification list.	N	N
			April 15	Ms. Mitchell responded stating that she wasn't sure where the list came from but ER's should be directed to her attention and she would coordinate on behalf of MECP.	Y	N
			April 16	EGI responded and asked whether the notification list should be updated to include Ms. Mitchell. EGI also noted that As per the OPCC list, Ruth Orwin was listed as the MECP representative for all pipeline projects in the eastern region.	Y	N
			April 16	Ms. Mitchell clarified that Ms. Orwin should be the only point of contact for eastern region.	N	N

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Agency Correspondence - Provincial						
Date of Contact (2019)	Name	Comment	Date of Response	Response and Issue Resolution (if applicable)	Follow-Up Required	Outstanding Issues
			April 24	EGI reached out to Ms. Mitchell regarding her request to send a thumb drive with the ER on it. EGI indicated that there have been past issues with file encryption in doing this and asked if they could instead send a hard copy of the report or a download link.	Y	N
			May 21	Ms. Mitchell sent MECP comments on the project via email.	N	N
			May 24	EGI responded thanking Ms. Mitchell for the comments.	N	N
April 23	Mary Dillon Ministry of Natural Resources and Forestry	Ms. Dillon emailed stating that she had received notice that the redacted ER is available for review form the project website, and asked if we could provide an electronic version that allows printing.	April 23	Dillon provided the ER to Ms. Dillon via file exchange uploader.	N	N
June 14	Hydro One	Hydro One provided a letter stating that there are no existing Hydro One transmission or distribution assets in the subject area.	N/A	N/A	N	N

Agency Correspondence - Municipal						
Date of Contact (2019)	Name	Comment	Date of Response	Response and Issue Resolution (if applicable)	Follow-Up Required	Outstanding Issues
February 19	Councillor Nussbaum	EGI provided an email with information about the project for the upcoming open house including the Notice.	N/A	N/A	N	

Agency Correspondence - Municipal						
Date of Contact (2019)	Name	Comment	Date of Response	Response and Issue Resolution (if applicable)	Follow-Up Required	Outstanding Issues
February 19	Councillor Tierney	EGI provided an email with information about the project for the upcoming open house including the Notice.	N/A	N/A	N	N
February 21	N/A	Dillon circulated the agency stakeholder letter providing information about the project with the Notice and project location map attached to all municipal contacts in the Stakeholder Contact List.	N/A	N/A	N	N
February 21	Laura Mueller	Provided confirmation of receipt of Notice via email.	N/A	N/A	N	N
February 28	Councillor Nussbaum	EGI provided a reminder via email of the upcoming open house on March 4.	N/A	N/A	N	N
February 28	Councillor Tierney	EGI provided a reminder via email of the upcoming open house on March 4.	N/A	N/A	N	N
March 4	Councillor Nussbaum	EGI provided the open house panels and indicated they were acceptable to share with constituents.	N/A	N/A	N	N
March 4	Councillor Tierney	EGI provided the open house panels and indicated they were acceptable to share with constituents.	N/A	N/A	N	N

Agency Correspondence - Municipal						
Date of Contact (2019)	Name	Comment	Date of Response	Response and Issue Resolution (if applicable)	Follow-Up Required	Outstanding Issues
March 4	Laura Mueller	Ms. Mueller emailed the project team to provide notice that Councillor Nussbaum is no longer the representative for Rideau-Rockcliffe Ward as he had taken on a new position as CEO of the National Capital Commission. She indicated that City Council has appointed two sitting Councillors, Mathieu Fleury and Jean Cloutier. She directed any correspondence to the rideaurockcliffeward@ottawa.ca email address.	March 4	EGI acknowledged the change and thanked Ms. Mueller for letting us know.	N	N
March 9	Councillor Tierney	Email received from Councillor Tierney asking how the attendance of the open house was and if there were any issues following the news that the mailed Notices arrived late.	March 10	EGI responded indicating we had a total of 8 attendees, and that, given the type of project this number was typical. EGI stated that a second open house was planned for early April given the Notice delivery issue and that they would reach out with details when confirmed.	Y	N
March 14	Laura Mueller	EGI emailed Ms. Mueller as a follow up to let her know that a second open house was planned and provided the details.	N/A	N/A	N	N
March 14	Councillor Tierney	EGI emailed Councillor Tierney as a follow-up to let her know that a second open house was planned and provided the details.	N/A	N/A	N	N
March 27	Councillor Tierney	EGI emailed Councillor Tierney a friendly reminder of the open house on April 3.	N/A	N/A	N	N
March 27	Laura Mueller	EGI emailed Ms. Mueller a friendly reminder of the open house on April 3.	March 28	Elizabeth Whyte of the Ward Office responded stating that she would be attending the open house on behalf of the Ward Office.	N	N/A

Agency Correspondence - Municipal						
Date of Contact (2019)	Name	Comment	Date of Response	Response and Issue Resolution (if applicable)	Follow-Up Required	Outstanding Issues
			April 3	Ms. Whyte confirmed that she would be attending around 6 pm as she could not make the entire meeting.	N	N
			April 3	EGL responded to Ms. Whyte letting her know a representative would be there to answer her questions and introduce her to the team, if needed.	N	N

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