

September 20, 2019

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

Dear Ms. Walli:

**Re: Enbridge Gas Inc.
Application for Certificates of Public Convenience and Necessity
Municipality of Thames Centre and the Municipality of Central Elgin
OEB File Number: EB-2019-0195**

In accordance with Procedural Order No. 1, these are Enbridge Gas' reply submissions to OEB Staff's submissions dated September 16, 2019.

In their submissions, OEB Staff offered two ways to extend CPCN rights to allow Enbridge Gas to provide service to the 5 subdivisions identified in the application:

- 1) amend Enbridge Gas' existing CPCNs for each of the municipalities to specifically include the respective subdivisions; or
- 2) issue a new CPCN for each of the two municipalities, in which case the new CPCNs would be specific to the lots and concessions of each of the subdivisions

Enbridge Gas' preference is the 2nd option (issue subdivision-specific CPCNs) given the work underway to identify the CPCN rights of Enbridge Gas and EPCOR Natural Gas LP in the CPCN Overlap proceeding (EB-2017-0108) and the ability to easily cancel and supersede the subdivision-specific CPCNs once a final determination is made in the CPCN Overlap proceeding.

Enbridge Gas notes that our response to OEB Staff-1(b) should refer to the Kokomo Beach Club subdivision being located in the former Village of Port Stanley (not Southwold). See Attachment 1 for an updated interrogatory response.

With respect to the draft CPCNs proposed by OEB Staff in their submissions, Enbridge Gas recommends modifications as indicated on the attached revised draft CPCNs (Attachments 2 and 3).

Should you have any questions on this submission, please do not hesitate to contact me.

Yours truly,

[Original Signed By]

Patrick McMahon
Specialist, Regulatory Research and Records
patrick.mcmahon@enbridge.com
(519) 436-5325

Encl.

c.c. (email only):

Penny Garnsworthy, EPCOR Utilities Inc.
Vince Cooney, EPCOR Utilities Inc.
Patrick Welsh, Osler Hoskin & Harcourt LLP

ENBRIDGE GAS INC.

Answer to Interrogatory from
Board Staff

Reference: Application, pp. 2-3

Preamble:

Enbridge Gas Inc. (Enbridge Gas) has identified within the Municipality of Thames Centre and the Municipality of Central Elgin, five of the most immediate requests for service extensions for the following areas (the subdivisions):

- Boardwalk at Millpond Subdivision
- Rosewood Subdivision
- Foxborough Subdivision
- Hawthorne Park Subdivision
- Kokomo Beach Club Subdivision

Questions:

- (a) Please confirm, for each of the subdivisions, that none of the proposed service extensions will be located within areas currently covered under Certificates of Public Convenience and Necessity (CPCN) held by EPCOR Natural Gas Limited Partnership.
- (b) Please provide the specific lots and concessions in the Municipality of Thames Centre and the Municipality of Central Elgin that each of the subdivisions will be located in.
- (c) As the requested amendments to the CPCNs for the Municipality of Thames Centre and the Municipality of Central Elgin have not yet been issued, pending a final decision in the EB-2017-0108 proceeding, please confirm that no construction has been initiated to construct the facilities to service the subdivisions. If construction has been initiated, please outline what has been completed.
- (d) For each of the subdivisions, please provide details regarding the anticipated total length of pipeline required, type of pipeline, volumetric throughput, operating pressure of the pipeline, and estimated project cost. Further, please outline if Enbridge Gas will need to file a leave to construct application for the construction of the pipelines to service any of the subdivisions. Will a system expansion surcharge be required for constructing the pipeline to service any of the subdivisions?
- (e) Please provide details of the approvals that have been obtained, as well as any additional approvals that will be required for the construction and operation of the proposed pipelines for each of the subdivisions.

Response:

- (a) Confirmed.
- (b) The table below identifies the lots and concessions for the 5 proposed subdivisions.

Subdivision	Lot/Concession
Boardwalk at Millpond Subdivision	Concession B SRT, Lots 18&19, North Dorchester
Rosewood Subdivision	Concession 3, Lot 15, West Nissouri
Foxborough Subdivision	Concession 3, Lot 15, West Nissouri
Hawthorne Park Subdivision	Concession B SRT, Lot 17, North Dorchester
Kokomo Beach Club Subdivision	Lot 15, Range 1, North of Lake Rd, Port Stanley /u Lot 15, Range 1, South of Lake Rd, Port Stanley /u

(c) Enbridge has not initiated any construction on the proposed service extensions.

(d) The table below provides the requested details for each of the subdivisions.

	Boardwalk at Millpond Subdivision	Rosewood Subdivision	Foxborough Subdivision	Hawthorne Park Subdivision	Kokomo Beach Club Subdivision
Total length of pipeline required (m)	2,250	1,420	940	To be determined	630
Type of pipeline	Polyethylene				
Volumetric throughput (m ³ /yr)	182,000	114,000	70,000	To be determined	58,000
Operating pressure of the pipeline	420 kPa				
Estimated project cost	\$208,000	\$114,600	\$76,700	To be determined	\$52,600

Enbridge plans to service 4 of the subdivisions at this time. The developer for the Hawthorne Park subdivision is in the process of finalizing the conceptual plan for this development so details for providing service to this subdivision have not been finalized.

A leave to construct application is not required to service any of these subdivisions given the cost of the projects and the facilities being installed. A system expansion surcharge is not required as these projects are being completed under the EBO 188 guidelines.

(e) For these projects, Enbridge is required to obtain a municipal approval / work permits. If the project crosses a county road, work permits are also required from the upper-tier government.

The table below provides the approvals required for each subdivision and the status of the consents.

Subdivision	Permits Required	Consent Received
Boardwalk at Millpond Subdivision	Municipality of Thames Centre	Yes
	County of Middlesex	Yes
Rosewood Subdivision	Municipality of Thames Centre	Yes
	County of Middlesex	Yes
Foxborough Subdivision	Municipality of Thames Centre	Yes
Hawthorne Park Subdivision	Municipality of Thames Centre	No ¹
	County of Middlesex	No ¹
Kokomo Beach Club Subdivision	Municipality of Central Elgin	Yes

Note:

- (1) The developer is working through the conceptual plan. Before Enbridge constructs this project, we will apply for the applicable permits and ensure consent is received prior to construction.

Certificate of Public Convenience and Necessity

The Ontario Energy Board hereby grants

Enbridge Gas Inc.

approval under section 8 of the *Municipal Franchises Act*, R.S.O. 1990, c. M.55, as amended, to construct works to supply gas in the Municipality of Thames Centre to ~~the~~ four proposed subdivisions identified as:

- Boardwalk at Millpond: Concession B SRT, Lots 18 & 19 (former Township of North Dorchester)
- Rosewood: Concession 3, Lot 15 (former Township of West Nissouri)
- Foxborough: Concession 3, Lot 15 (former Township of West Nissouri)
- Hawthorne Park: Concession B SRT, Lot 17 (former Township of North Dorchester)

as ~~it is~~ constituted on the date of this Decision and Order.

DATED at Toronto, September XX, 2019

ONTARIO ENERGY BOARD

Pascale Duguay
Manager, Application Policy and Climate Change

Certificate of Public Convenience and Necessity

The Ontario Energy Board hereby grants

Enbridge Gas Inc.

approval under section 8 of the *Municipal Franchises Act*, R.S.O. 1990, c. M.55, as amended, to construct works to supply gas in the Municipality of Central Elgin to the proposed subdivision identified as:

- Kokomo Beach Club: Lot 15, Range 1, North of Lake Road, ~~Southwold~~ and Lot 15, Range 1, South of Lake Road, ~~Southwold~~ (former Village of Port Stanley)

as ~~it is~~ constituted on the date of this Decision and Order.

DATED at Toronto, September XX, 2019

ONTARIO ENERGY BOARD

Pascale Duguay
Manager, Application Policy and Climate Change