



BY E-MAIL

October 24, 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.
Don River NPS 30 Replacement Project
Ontario Energy Board File Number EB-2018-0108
Request to Vary, Change Request No. 1**

The Ontario Energy Board (OEB) is in receipt of your letter dated October 15, 2019 (Letter), in which Enbridge Gas Inc. (Enbridge Gas) proposed a change to the Don River NPS 30 Replacement Project (Project). The Project involves relocating a portion of the Don River NPS 30 pipeline (Pipeline) off of a utility bridge (Bridge) as the Bridge poses a risk to the safe operation and reliability of the pipeline. The change request involves deferring the in-service date for the Project from the planned in-service date of September 2019 to May 2020.

As part of its application, Enbridge Gas filed four engineering studies to demonstrate that structural issues with the Bridge can become further impaired if a large flood event or several small weather events were to occur, which could ultimately cause the Bridge and the Pipeline to fail. The Pipeline is a critical source of natural gas supply to a large population of firm residential, commercial, and industrial customers, as well as natural gas-fired power plants in downtown Toronto. In its application, Enbridge Gas noted that in the event of a Pipeline or a Bridge failure, Enbridge's mitigation plan would entail isolating the pipeline utilizing valves, resulting in outages that would leave a large firm customer without natural gas service. Enbridge Gas indicated that the planned in-service date for the Project was September 2019.

In its Decision and Order, the OEB found that the Project is needed to ensure the safe operation and reliability of the Don Valley Pipeline¹.

¹ EB-2018-0108, Decision and Order, issued November 29, 2018

In the Letter, Enbridge Gas states that the original in-service date was premised on its ability to complete tie-in work during the planned shut-down of a large volume customer in 2019. Due to delays in obtaining permits, the tie-in work cannot be completed during the planned shut down in 2019. The tie-in work has been rescheduled to be completed during the next planned shut down in 2020, thereby delaying the in-service date for the Project to May 2020.

In the Letter, Enbridge Gas states that it considered an alternative option for tying in the pipeline in the winter of 2019 with the use of a bypass. However, this option was rejected by Enbridge Gas due to operational risks and network constraints that would be present during the winter heating season.

Enbridge Gas noted that as a result of this change, the duration of certain permits and the duration of temporary work space will require an extension. Authorizations required for this change involve road cut permits and temporary workspace from the City of Toronto, and a rail permit from Metrolinx. Enbridge Gas states that the time extension (and in particular the extended duration of temporary work space requirements) will increase costs, but that this increased cost will be covered by the budgeted contingency for the Project. As a result, Enbridge Gas expects there will be no impact to the overall costs for the Project.

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

As the Manager, Applications Supply and Infrastructure, 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 Project in respect of which leave to construct was granted by the OEB in the EB-2018-0108 proceeding. I have been further granted the authority to approve any changes that I have concluded are not material.

Based on my review of the initial information provided, I am unable to determine whether the change proposed by Enbridge Gas is material. Enbridge Gas is asked to file the following additional information:

1. An explanation of the operational risks, network constraints, and costs associated with performing the by-pass option.
2. An explanation of how Enbridge Gas will mitigate the risks of using the utility Bridge for an additional 8 months, including how Enbridge Gas will reduce the impact of any outages for customers should the Bridge fail.

3. A comparison of the risks associated with performing the by-pass option versus the risks associated with prolonged use of the utility Bridge, including quantitative analysis.
4. A schedule for the by-pass option.

Yours truly,

Original Signed by

Nancy Marconi
Manager, Applications Supply and Infrastructure