



**BY E-MAIL**

November 20, 2019

Ms. Asha Patel  
Technical Manager  
Regulatory Applications  
Enbridge Gas Inc.  
500 Consumers Road  
Willowdale ON M2J 1P8  
[EGRegulatoryProceedings@enbridge.com](mailto:EGRegulatoryProceedings@enbridge.com)

Dear Ms. Patel:

**Re: Enbridge Gas Inc.  
Request to Vary Don River NPS 30 Replacement Project  
Ontario Energy Board File Number EB-2019-0275  
Request to Vary, Change Request No. 1**

On October 15, 2019, Enbridge Gas Inc. (Enbridge Gas) submitted a letter to the OEB in which it proposed a change to the Don River NPS 30 Replacement Project (Project), which had been approved by the OEB on November 29, 2018<sup>1</sup>. The Project involves relocating a portion of the Don River NPS 30 pipeline (Pipeline) off 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.

In its October 15, 2019 letter, Enbridge Gas explained that, as a result of permit delays, it is unable to complete the final tie-in of the Pipeline until the next planned maintenance shut-down of a large volume customer, which is scheduled for April 2020. Enbridge Gas stated 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.

The proposed change will result in an extension to the duration of certain permits and the duration of temporary workspace. 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

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<sup>1</sup> EB-2018-0108

Gas expects there will be no impact to the overall costs for the Project. Enbridge Gas submitted that the change will not modify the Project's originally proposed construction or restoration practices, environmental mitigation measures, stakeholder consultations, or land requirements.

On October 24, 2019, the OEB issued a letter to Enbridge Gas requesting additional information such that a decision could be made on Enbridge Gas's proposed change. In particular, the OEB asked for:

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 eight 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

On November 1, 2019, Enbridge Gas submitted its responses to the OEB's request for more information.

Enbridge Gas stated that the operational risks and network constraints associated with constructing a bypass during the winter months include:

- a) Challenges with inserting and obtaining a gas stop due to high flow conditions
- b) Potential damage to the bypass due to limited work space
- c) Potential third-party damage due to additional fittings being added to the NPS 30 main
- d) Potential for resource constraints around the holiday season
- e) Potential for significant customer loss during the heating season should an outage occur on the line while the bypass option is being executed

For these reasons, Enbridge Gas eliminated the bypass option.

In the original plan, there were two options to tie-in the pipe: (1) to tie-in during the planned maintenance shutdown of a large volume customer, and (2) to use a bypass if the planned maintenance option was missed in Fall 2019. As a result of the permitting delays, the earliest that the tie-in could occur if the bypass option is utilized would be December 2019, with completion in Q1 2020.

Enbridge Gas explained that, in its view, it will only be using the Bridge for an additional three months, rather than eight months, with the deferred tie-in option as Enbridge Gas was delayed in starting construction of the Pipeline due to permitting delays. In Enbridge

Gas' view, using the Bridge for up to an additional three months does not outweigh the operational risks and network constraints associated with the bypass option outlined above.

In its letter of November 1, 2019, Enbridge Gas did not provide information on how it would mitigate the risks of using the Bridge for an extended period of time, nor did it provide a quantitative risk analysis of the deferred tie-in relative to the winter bypass option.

The information provided to date by Enbridge Gas is insufficient to allow the OEB to determine whether the proposed deferral of the tie-in to April 2020 poses less risk than the winter bypass option.

The OEB requires Enbridge Gas, by no later than November 28, 2019, to submit to the OEB complete answers to the questions set out in the OEB's letter of October 24, 2019. Enbridge Gas should include with its response any internal and third party analysis and reports that support the conclusion that using the Bridge for an extended period of time does not outweigh the operational risks and network constraints associated with the bypass option. The information should also identify, where applicable, seasonal timing constraints around the viability of the bypass option. Enbridge Gas should also include in its response any schematics or photos that the OEB may find useful in understanding the materials, equipment and construction techniques required for both the tie-in and bypass options.

Yours truly,

*Original Signed By*

Christine E. Long  
Board Secretary and Registrar

c: Mr. Guri Pannu, [Guri.Pannu@enbridge.com](mailto:Guri.Pannu@enbridge.com)