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VIA Email, RESS and Courier

January 3, 2020

Ms. Christine Long
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ms. Long:

**Re: Enbridge Gas Inc. ("Enbridge Gas")
Ontario Energy Board ("Board") File No.: EB-2018-0003
Oxford Reinforcement Project ("Project")**

On May 17, 2018 the Board issued its Decision and Order for the above noted proceeding which included, as Schedule B, several Conditions of Approval.

Per section 5. and 6. (b) in the aforementioned Decision and Order, Enbridge Gas is to provide the Board with a post financial construction report concurrent with the final monitoring report no later than fifteen months after the in-service date. Please find enclosed a copy of both the Financial Construction and Final Monitoring Reports for the Oxford Reinforcement project.

Please contact me if you have any questions.

Yours truly,

(Original Signed)

Alison Evans
Advisor Rates
Regulatory Application

**2018 OXFORD REINFORCEMENT PROJECT
FINAL MONITORING REPORT
EB-2018-0003**

Prepared by: Enbridge Gas Inc.
Environmental Planning
December 2019

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Final Monitoring Report

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1.0 INTRODUCTION

This Final Monitoring Report is provided pursuant to the Ontario Energy Board (“Board”) Decision and Order for the EB-2018-0003 proceeding. The Decision and Order granted Enbridge Gas Inc. (Enbridge Gas) leave to construct the Oxford Reinforcement Project (the “Project”). The Project consisted of approximately 5.2 kilometers of NPS 8-inch natural gas pipeline in the Counties of Oxford and Norfolk. On January 1, 2019 Enbridge Gas Distribution Inc. and Union Gas Limited amalgamated to form Enbridge Gas Inc. (“Enbridge Gas”).

The Project was required to meet the increasing demands for natural gas in Counties of Oxford and Norfolk. No significant changes to the Eastern Transmission System have occurred within the past 15 years with estimates indicating the system reaching maximum capacity in 2019. Therefore, reinforcement was required to service new loads in the area. The new NPS 8-inch pipeline will extend from the corner of Potters Road and Baseline Road in the County of Oxford to the corner of Windham Road 20 and Swimming Pool Road in the County of Norfolk. A map of the pipeline route is included in Appendix A.

The OEB’s Decision and Order for the Project specified several conditions of approval (“COA”). The COAs can be found in Appendix B of this report. The specific COAs addressed in this report are as follows:

1.0 Union Gas Limited (“Union”) shall construct the facilities and restore the land in accordance with the OEB’s Decision and Order in EB-2018-0003 and these Conditions of Approval.

3.0 Union shall implement all the recommendations of the Environmental Report filed in the proceeding and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.

4.0 *Union shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Union shall not make 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.*

6.0 *Both during and after construction, Union shall monitor the impacts of construction, and shall file with the OEB one paper copy and one electronic (searchable PDF) version of each of the following reports:*

a) a post construction report, within three months of the in-service date, which shall:

- i. provide a certification, by a senior executive of the company, of Union's adherence to Condition 1;*
- ii. described any impact or outstanding concerns identified during construction;*
- iii. describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of the construction;*
- iv. include a log of all complaints received by Union, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rational for taking such actions and;*
- v. provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licences and certificates required to construct, operate and maintain the proposed project.*

b) a final monitoring report, no later than fifteen months after the in-service date or where the deadline falls between December 1 and May 31, following June 1, which shall:

- i. provide a certification, by a senior executive of the company, of Union's adherence to Condition 3;*
- ii. describe the condition of any rehabilitated land;*
- iii. describe the effectiveness of any actions taken to prevent or mitigate and identified impacts of construction.*

- iv. *include the results of any analyses and monitoring programs and any recommendations arising therefrom; and*
- v. *include a log of all complaints received by Union, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rational for taking such actions.*

2.0 BACKGROUND

Enbridge Gas was granted approval to construct the Oxford Reinforcement Project on May 17, 2018. Construction began on June 18, 2018 with the pipeline placed into service on October 4, 2018 and cleanup for the year completed on October 30, 2018.

Construction was initiated from the corner of Potters Road and Baseline Road in the County of Oxford in a southerly direction to the corner of Windham Road 20 and Swimming Pool Road in the County of Norwich with the following order of operations: topsoil removal, stringing, welding, joint coating, directional drilling, trenching, lowering-in, tie-ins, backfilling, testing and clean-up. Enbridge returned to the right-of-way in spring 2019 to complete the following activities: repair any subsidence on the right-of-way, perform a general overview of the right-of-way and complete any additional clean-up that was required.

3.0 POTENTIAL IMPACTS AND MITIGATION

3.1 Condition 1.0

Union Gas Limited (“Union”) shall construct the facilities and restore the land in accordance with the Board’s Decision and Order in EB-2018-0003 and these Conditions of Approval.

Enbridge Gas has complied with all conditions imposed by the Board’s Decision and Order in EB-2018-0003 and the COAs associated with that Decision and Order during construction of the Project. Enbridge Gas has restored the land according to the evidence provided in support of its

application in accordance with the evidence provided in support of the application and the Board's Decision and Order.

3.2 Condition 3.0

Union shall implement all the recommendations of the Environmental Report filed in the proceeding, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.

Enbridge Gas has implemented all recommendations and mitigation measures outlined in the Environmental Study Report (ER) along with all directives identified by the Ontario Pipeline Coordinating Committee (OPCC) review. Table 1 summarizes the construction effects and general mitigation measures carried out during construction. All mitigation techniques used throughout construction were also implemented during cleanup activities as required.

3.3 Condition 4.0

Union shall advise the Board of any proposed change to Board-approved construction or restoration procedures. Except in an emergency, Union shall not make such change without prior notice to and written approval of the Board. In the event of an emergency, the Board shall be informed immediately after the fact.

There were no "Requests to Vary" issued during the project.

3.4 Condition 6.0

Both during and after construction, Union shall monitor the impacts of construction, and shall file with the Board one paper copy and one electronic (searchable PDF) version of each of the following reports:

- a) *post construction report, within three months of the in-service date, which shall:*
 - i. *provide a certification, by a senior executive of the company, of Union's adherence to Condition;*

- ii. *described any impact or outstanding concerns identified during construction*
- iii. *describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of the construction;*
- iv. *include a log of all complaints received by Union, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rational for taking such actions and:*
- v. *provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licences and certificates required to construct, operate and maintain the proposed project.*

The previously filed Post Monitoring Report included the required certifications from a senior executive, describing the construction effects and general mitigation measures employed during construction and provided a description of the successfully completed monitoring programs initiated both prior to and during construction.

- b) *a final monitoring report, no later than fifteen months after the in-service date or where the deadline falls between December 1 and May 31, following June 1, which shall:*

- i. *provide a certification, by a senior executive of the company, of Union's adherence to Condition 3;*

One paper copy and one electronic (searchable PDF) version of this Final Monitoring Report have been filed with the OEB. Enbridge Gas has implemented all the recommendations of the Environmental Report filed in the proceeding, and all the recommendations and directives identified by the OPCC review. Executive certification can be found in Appendix C to this report.

- ii. *describe the condition of any rehabilitated land;*
- iii. *describe the effectiveness of any actions taken to prevent or mitigate and identified impacts of construction.*

- iv. *include the results of any analyses and monitoring programs and any recommendations arising therefrom; and*

The entire right of way was checked for stability, subsidence and vegetation re-establishment in the spring of 2018 and found to be successfully rehabilitating and protected with proper sediment control devices to aid in the rehabilitation process. No deficiencies in compliance were identified. No post construction monitoring programs were required or performed.

- v. *include a log of all complaints received by Union, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions and:*

To date no complaints have been received by Enbridge Gas for the Project. Enbridge Gas will continue to monitor the state of the land and environment and will address any landowner concerns, if they should arise.

4.0 SUMMARY

This Final Monitoring Report has been prepared pursuant to the COAs contained in the Board Decision and Order for the EB-2018-0003 proceeding. The report in conjunction with the previously filed Post Construction Report provides confirmation that Enbridge Gas has implemented all the recommendations of the Environmental Protection Plan filed in the proceeding and all recommendations and directives identified by the Ontario Pipeline Coordinating Committee review. This report also confirms that Enbridge Gas successfully rehabilitated the land disturbed from construction and there are no outstanding concerns. It is anticipated that these mitigation measures and rehabilitation efforts will effectively eliminate any long-term impacts to the environment.

“Table 1”

Potential Impacts and Mitigation Measures

TABLE 1: MITIGATION SUMMARY

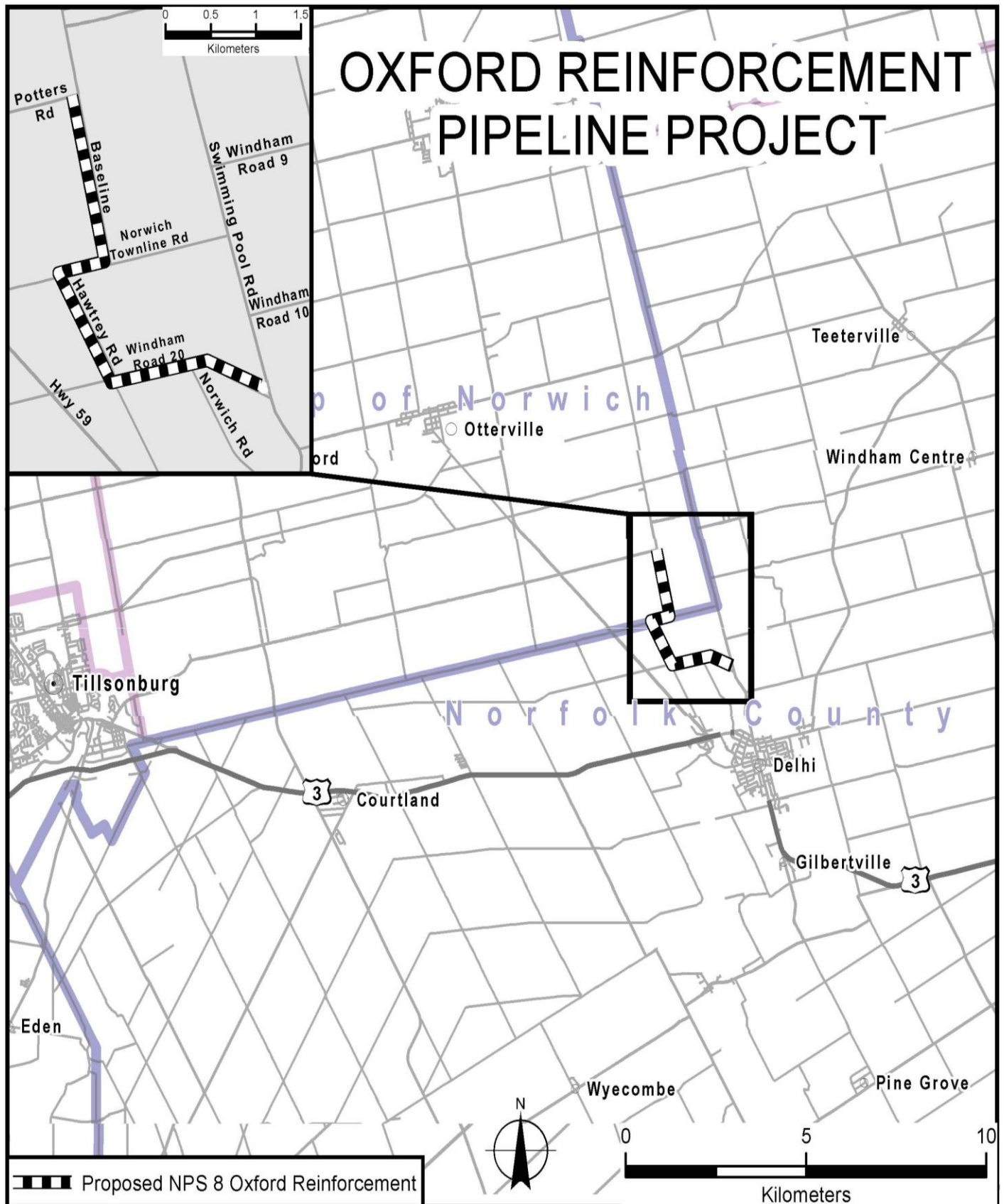
Issue	Potential Impact	Proposed Mitigation
a) Archaeology	Disturbance to cultural heritage resources.	<ul style="list-style-type: none"> • Prior to any activities associated with the project, a Stage 1 and Stage 2 archaeological assessment was completed. No artifacts were found during the survey or construction.
b) Species at Risk (SAR)	Encountering SAR	<ul style="list-style-type: none"> • Enbridge Gas employed the services of Neegan Burnside who contacted the Ministry of Natural Resources and Forestry concerning SAR. The MNRF recommended additional surveys in the spring of 2018 which were completed and accepted by the MNRF. • There were no SAR concerns encountered during construction
c) Landowner Concerns	Disruption to landowners	<ul style="list-style-type: none"> • Enbridge Gas provided the landowners with the telephone numbers of Company personnel. • A Landowner Relations Program was established to track complaints during construction. • To date there have been no complaints entered into the complaint tracking system.
d) Watercourses	Water quality concerns	<ul style="list-style-type: none"> • There were no watercourses encountered during the project and therefore no permit was required from the local conservation authority.
e) Road Side Ditches	Water quality concerns	<ul style="list-style-type: none"> • Ensured ditches were returned to pre-construction condition as quickly as possible.
f) Roadways	Disruption to local citizens and businesses	<ul style="list-style-type: none"> • At least one lane of traffic was maintained at all times. • Flag persons and warning devices were used to notify traffic of the construction zone.
g) Public Safety	Public safety concerns	<ul style="list-style-type: none"> • Company inspectors ensured public safety on construction site. • Ensured proper signage and flag persons if required.
h) Construction Equipment	Disruption to landowners and tenants	<ul style="list-style-type: none"> • Equipment was stored well off the road shoulders when not in use.
i) Construction Noise	Disturbance to landowners and tenants	<ul style="list-style-type: none"> • Construction was carried out during daylight hours whenever possible. • Ensured equipment was properly muffled.
j) Fuel Storage and Handling	Improper fuel storage and handling may cause spillage and possible contamination of soil	<ul style="list-style-type: none"> • Fuel was not stored near watercourses (i.e. Within 50 metres) • Spill clean-up materials were stored on site and available in the event of a spill. Spills or leakage were to be reported to the appropriate authority immediately (Ministry of the Environment Spills Action Centre at 1-800-268-6060) • No reportable spills were recorded during construction

Appendix A

Location Map

GENERAL LOCATION MAP

2018 OXFORD REINFORCEMENT PROJECT



Appendix B

Conditions of Approval

Leave to Construct Conditions of Approval
Application under Section 90 of the OEB Act
Union Gas Limited
EB-2018-0003

1. Union Gas Limited (Union) shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in EB-2018-0003 and these Conditions of Approval.
2. (a) Authorization for leave to construct shall terminate 12 months after the decision is issued, unless construction has commenced prior to that date.

(b) Union shall give the OEB notice in writing:
 - i. of the commencement of construction, at least ten days prior to the date construction commences;
 - ii. of the planned in-service date, at least ten days prior to the date the facilities go into service;
 - iii. of the date on which construction was completed, no later than 10 days following the completion of construction; and
 - iv. of the in-service date, no later than 10 days after the facilities go into service.
3. Union shall implement all the recommendations of the Environmental Report filed in the proceeding, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.
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.
5. Concurrent with the final monitoring report referred to in Condition 6(b), Union shall file a Post Construction Financial Report, which shall indicate the actual capital costs of the project and shall provide an explanation for any significant variances from the cost estimates filed in this proceeding. Union shall also file a copy of the Post Construction Financial Report in the proceeding where the actual capital costs of the project are proposed to be included in rate base or any proceeding where Union proposes to start collecting revenues associated with the project - whichever is earlier.

6. Both during and after construction, Union shall monitor the impacts of construction, and shall file with the OEB one paper copy and one electronic (searchable PDF) version of each of the following reports:
- a) a post construction report, within three months of the in-service date, which shall:
 - i. provide a certification, by a senior executive of the company, of Union's adherence to Condition 1;
 - ii. describe any impacts and outstanding concerns identified during construction;
 - iii. describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction;
 - iv. include a log of all complaints received by Union, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions; and
 - v. provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licences, and certificates required to construct, operate and maintain the proposed project.
 - b) a final monitoring report, no later than fifteen months after the in-service date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:
 - i. provide a certification, by a senior executive of the company, of Union's adherence to Condition 3;
 - ii. describe the condition of any rehabilitated land;
 - iii. describe the effectiveness of any actions taken to prevent or mitigate any identified impacts of construction;
 - iv. include the results of analyses and monitoring programs and any recommendations arising therefrom; and
 - v. include a log of all complaints received by Union, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions.

Appendix C

Executive Certification



OXFORD REINFORCEMENT PROJECT
EB-2018-0003

I hereby certify Enbridge Gas Inc. has complied with the Decision and Order, Schedule B, EB-2015-0120, Condition 6.0 b) i

Dec 12 / 2019

Date

Michelle George

Michelle George

Vice President, Engineering
Enbridge Gas Inc.

Condition 6.0

b) i: provide a certification, by a senior executive of the company, of Union's adherence to Condition 3;

POST CONSTRUCTION FINANCIAL REPORT 2018 Oxford Replacement Project

In compliance with the Ontario Energy Board Order EB-2018-0003 and Condition 5, the following is a report on the capital pipeline and station cost for the 2018 Oxford Replacement project.

The Project actual cost was \$4,662,754 or 37% lower than estimated. The following explains any significant variances.

	Baseline	Actual Costs	Variance	Variance
	\$	\$	\$	%
Mainline				
(1) Pipeline and Equipment	\$ 1,071,000	\$ 1,028,840	\$ 42,160	4%
(2) Construction and Labour	\$ 5,360,000	\$ 3,602,590	\$ 1,757,410	33%
(3) Contingency	\$ 965,000	\$ -	\$ 965,000	-100%
(4) IDC		\$ 31,324	-\$ 31,324	100%
Total Project Capital Costs	\$ 7,396,000	\$ 4,662,754	\$ 2,733,246	37%

- 1) Actual cost for Material and Equipment for the Project were slightly lower than original estimates which were based upon historical average unit cost.
- 2) Actual cost for Prime Contractor, Miscellaneous Outside Services, and Land were all lower than the original estimate. Key reasons for being under budget include: excellent weld production rates (low repair rate), contractor efficiencies with nearby projects sharing resources, NDE contractor time on site was optimized, and limited inclement weather impact.
- 3) Contingency for the project was not used because other forecast costs came in lower than estimated.
- 4) Interest During Construction actuals are shown separately. These costs were not separated during the OEB application.