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January 10, 2020

VIA EMAIL, RESS and COURIER

Ms. Christine Long
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: Enbridge Gas Inc. ("Enbridge Gas")
Ontario Energy Board ("OEB") File No.: EB-2019-0187
Saugeen First Nation Community Expansion Project
Interrogatory Responses**

In accordance with Procedural Order No. 1, enclosed please find interrogatory responses from Enbridge Gas in the above noted proceeding.

This submission has been filed through the OEB's RESS and will be available on Enbridge Gas's website at:

<https://www.uniongas.com/about-us/companyoverview/regulatory>

If you have any questions with respect to this submission, please contact the undersigned.

Yours truly,

(Original Signed)

Asha Patel
Technical Manager, Regulatory Applications

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe

Interrogatory

Reference:

Ministry Directives to the OEB requiring that all cost-effective natural gas energy efficiency opportunities be pursued¹. Provincial policy and Environment Plan² identifying the need to leverage all natural gas Demand Side Management (DSM) opportunities.

Question(s):

- a) All new customers will require a contractor to visit their home or business to install natural gas equipment. Please confirm that adding new customers is one of the best opportunities to leverage energy efficiency (i.e. DSM) opportunities in that community's homes or business? If not, please explain and indicate where new customers rank in relation to better DSM opportunities.
- b) Please provide a list of all DSM programs that could be leveraged by homes and businesses in this community.
- c) Please provide an estimate of the volumetric and bill savings (total cumulative and aggregated by customer type – residential, commercial and industrial) that would be achieved if all applicable DSM programs were adopted by:
 - i. All 176 potential customers in this community
 - ii. All 86 customers estimated to be connected (65 residential and 24 small commercial)
- d) Enbridge has promoted broader conservation programs and consumer education in alignment with DSM and provincial policy (e.g. opportunities to save water, electricity, reduce emissions, etc.). Enbridge has also partnered with organization such as IESO to promote energy efficiency in a cost-effective manner.

¹ Minister's Directive, March 26, 2014, para. 4(i) and Minister's Directive, March 06, 2019, para. 5.

² Ontario, *Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan*, November 29, 2018, p. 23.

- i. Can Enbridge confirm what complimentary energy efficiency activities it could promote to consumers in this community while it is doing customer attachment outreach. For each opportunity, please indicate whether it has been leveraged or will be leverage for Ratepayers in this community.
- ii. Has Enbridge notified any of its program partners of the opportunity to partner in this community? If so, please provide a summary of partners and which initiatives it plans to promote by partner.

Response

- a) Confirmed. Enbridge Gas agrees that adding a new customer does represent a natural decision point at which home/building owners could be influenced to pursue more energy efficient solutions.
- b) As noted in the response to Exhibit I.STAFF.9 part b) all existing DSM offerings would be available to potential customers that intend to be served by Community Expansion Projects.
- c) The application forecasts that customer adds will span over a decade following the completion of this Project. Providing an estimate as requested would require knowledge of what OEB approved programs would be available over the 10 year period as well as how baselines might evolve. Without more certainty around these areas, Enbridge Gas has no basis to estimate the factors required to forecast savings scenarios. Please also see the response to Exhibit I.STAFF.9 part b).
- d)
 - i. Enbridge will utilize the same marketing efforts for its DSM programs undertaken across all of its franchise in order to inform potential customers about energy efficiency opportunities.
 - ii. Enbridge Gas conducts regular outreach to the contractor community to generate awareness around the program offerings available and benefits to customers for participating. These efforts would also encompass new communities as natural gas system expansion occurs.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe

Interrogatory

Reference:

Provincial policy requires effective integrated community energy planning in alignment with integrated resource planning, particularly where new energy infrastructure is being built³. Saugeen Shores supports community energy planning and has completed an Energy Conservation and Demand Management Plan⁴. The Town of Saugeen Shores policy indicates that it will incorporate energy efficiency into all aspects of operations wherever possible⁵.

Question(s):

- a) Please provide details on any support (financial, resource or otherwise) Enbridge has provided or intends to provide this community to support its community energy plan, CDM Plan or reach the policy goals outlined above.
- b) Please identify what elements from the above noted documents Enbridge used when developing their plan for this project to serve the community.
- c) Please confirm that the planning approach, implementation and application of Enbridge programs (e.g. DSM) for this project represents the lowest (total lifecycle) cost option to Ratepayers in this community over the life of the proposed pipeline assets. If not, please explain why.
- d) Please provide a copy of consumer information (including any door to door questionnaire) materials that were used during public consultation and customer canvassing for this project.
- e) Please provide a summary of all energy efficiency and community energy planning information provided at any public consultation meetings held related to this project.

³ <http://www.mah.gov.on.ca/AssetFactory.aspx?did=10463>, Provincial Policy Statement sections 1.6 and 1.8

⁴ <https://www.saugeenshores.ca/en/town-hall/resources/Documents/Energy-consumption-reports/Energy-Management-Plan.pdf>

⁵ ibid

Response

a) – c)

Enbridge Gas notes the question refers to the Town of Saugeen Shores. The present application is to expand Enbridge Gas's distribution system to the Saugeen First Nation community.

Enbridge Gas is involved in Community Energy Planning across its franchise area as appropriate. Enbridge Gas will look at ways to commit resources as might be helpful to the Town of Saugeen Shores. In general, when requests come from municipalities for support with community energy planning, Enbridge Gas will volunteer to sit on municipal committees related to the planning and to connect appropriate technical experts from Enbridge Gas with relevant municipal staff. The DSM Framework does not currently allow for non-gas customers to receive gas customer subsidized programming.

The proposed NPS 4 pipeline identified for this Project (Saugeen First Nation Expansion Project) was sized to meet the 10-year forecast growth in the Project area as well as potential future growth. Historical gas use is used as a base to predict future consumption. The planning process includes changes in gas use resulting from historical implementation of DSM measures, as well as other factors such as improved building codes, and higher energy efficiency standards for natural gas equipment.

Expansion to the Saugeen First Nation community is driven by several imperatives. Given the policy support and related funding, the proposed pipeline assets provide the appropriate energy solution. If there is no natural gas being supplied to the area, then the residents would not be able to receive DSM programs.

- d) Please find attached a copy of the Saugeen First Nation Natural Gas Expansion Questionnaire Report which includes a summary of the key findings plus a copy of the questionnaire and cover letter (Attachment 1). As noted in the attached, "Union Gas conducted a questionnaire in the Saugeen First Nation area to ascertain interest in obtaining natural gas service amongst the residential population. An employee from Union Gas administered the questionnaire door-to-door in May 2017."¹

¹ Effective January 1, 2019 Union Gas Limited and Enbridge Gas Distribution amalgamated to form Enbridge Gas Inc.

Enbridge Gas submits that, to date, aside from the questionnaire no other “consumer information” materials were used during public consultation and customer canvassing for the Project. Rather, information has been shared through meetings and informal discussion.

In terms of next steps, Enbridge Gas is planning to hold an Open House for the Saugeen First Nation Expansion Project early this year. During the Open House residents impacted by the Project will have an opportunity to learn more about the Project and natural gas in general through presentations and Q&A.

- e) The Saugeen First Nation is an area currently not served by natural gas. For this reason, DSM and the potential savings a customer can realize through efficiency and conservation measures have not been discussed. Rather, efforts have been focused on communicating the benefits of natural gas and the savings one can realize from a fuel switching perspective. Such savings are noted in Attachment 1 to part d). In addition, as noted above, Enbridge Gas is planning to hold an Open House for the Project at which time energy efficiency (i.e., DSM) can be addressed.

Saugeen First Nation Natural Gas Expansion Questionnaire

About the Questionnaire:

Union Gas conducted a questionnaire in the Saugeen First Nation area to ascertain interest in obtaining natural gas service amongst the residential population. An employee from Union Gas administered the questionnaire door-to-door in May 2017. 61 private residential households were approached to complete the questionnaire, with 32 responding. The questionnaire informed residents about the cost to convert to natural gas, including the surcharge. The questionnaire also requested information pertaining to current fuel type and dwelling characteristics.

Key Findings:

- The questionnaire results indicate that primary energy sources of heat in Saugeen First Nation are electricity (60%), propane (17%), wood (13%), and oil (10%). The most prevalent residential heating systems are electric baseboard (57%), propane forced air (13%), wood stove/fireplace (13%), and oil forced air (10%).
- With both the equipment conversion cost and an additional surcharge of \$0.23 cents per cubic meter of natural gas, 26 respondents (43% of the total private residential households) are likely (extremely likely, very likely or likely) to convert their space heating system to natural gas.
- Of those likely to convert their space heating system with the surcharge, 85% would do so within the first 12 months and 15% would convert within 1-2 years.

Housing Characteristics:

The majority of the private homes in Saugeen First Nation are bungalows. The average house size is 1,270 square feet and the majority of houses were built in 1981 or later. Housing Characteristics are shown below in Table 1.

Table 1. Housing Characteristics (n=32)

Building type:		Approximate size of home (in sq. feet):	
<i>Bungalow/One storey ranch</i>	58%	<i>Less than 1,000</i>	15%
<i>Two storey</i>	15%	<i>1,000 to 1,500</i>	69%
<i>Split level</i>	12%	<i>1,501 to 2,000</i>	15%
<i>Raised ranch</i>	12%	<i>More than 2,000</i>	0%
<i>Three storey house</i>	0%	<i>Average size</i>	1,270 sq. ft.
<i>Something else</i>	4%		
Year home was built:			
<i>1950 or earlier</i>	12%		
<i>1951-1980</i>	23%		
<i>1981 or later</i>	65%		

Totals may not add to 100% due to rounding.

Appendix: Questionnaire



May 2017

Dear homeowner,

For more than four years, Union Gas has been working with the province of Ontario and municipalities to make affordable natural gas available to rural and Indigenous communities. We are conducting a survey to help determine if a proposal for government funding to support extending natural gas service to the Saugeen First Nation area can be made.

Natural gas is a less expensive source of energy than electricity, oil, or propane. The cost of changing your home heating to natural gas depends on the type of equipment you currently have. The table below shows estimated conversion/replacement costs and the resulting annual energy savings for an average home. Please visit uniongas.com/about-us for more information about Union Gas and natural gas.

Heating Equipment:	Estimated Conversion/Replacement Cost	Annual Space Heating Savings ¹
Oil forced air	\$4,000 - \$4,900	\$500
Electric forced air	\$4,000 - \$4,900	\$500 ²
Propane forced air – for newer systems that can be converted without replacement	\$400 - \$900	\$450
Propane forced air – for older systems that have to be fully replaced	\$4,000 - \$4,900	\$450
Electric baseboard	<ul style="list-style-type: none"> • \$11,100 for a new natural gas forced air furnace and duct work • \$3,500 for a natural gas fireplace 	\$500 ²
Oil boiler (hot water radiators)	\$4,000 - \$4,900	\$500
Propane boiler (hot water radiators)	\$4,000 - \$4,900	\$450

¹ Homeowners converting to natural gas would be required to pay a surcharge towards the cost of constructing the pipeline for a 40 year period. The surcharge will be 23 cents per cubic meter of natural gas. The annual saving estimates are based on the annual cost of natural gas for an average home including this surcharge, compared to the annual cost of other energy types. Annual cost and saving estimates are based on January 2017 fuel rates for a standard four-person home using 1,870 cubic meters (m³) of natural gas for space heating per year. Water heater savings are based on using an additional 330 cubic meters (m³) per year.

² Electricity savings are based on Hydro One Low Density Rates, with costs reduced to reflect the anticipated reduction in electricity rates (including those specifically for on-reserve citizens) from the provincial government's upcoming "Fair Hydro Plan". Assumptions: Time-of-Use prices reduced by 30 per cent, delivery charge eliminated, and Rural or Remote Rate Protection charge reduced by 0.17¢ per kWh.

Replacing an electric, propane or oil water heater with a natural gas unit will cost approximately \$1,500, and will result in another \$130¹ in annual savings if your current water heater is fuelled by oil or propane, or electricity.

f

Union Gas System Expansion Questionnaire

The Ontario Energy Board is currently reviewing Union Gas' application to bring natural gas to your community. If the application is approved, Union Gas will provide details about construction and how to connect.

1. What type of system provides the primary source of heat for this premise?

- | | |
|---|---|
| <input type="checkbox"/> Electric baseboard | <input type="checkbox"/> Electric forced air |
| <input type="checkbox"/> Geothermal | <input type="checkbox"/> Propane boiler (hot water radiators) |
| <input type="checkbox"/> Electric heat pump | <input type="checkbox"/> Propane forced air |
| <input type="checkbox"/> Oil forced air | <input type="checkbox"/> Wood forced air |
| <input type="checkbox"/> Oil boiler (hot water radiators) | <input type="checkbox"/> Wood Stove/Fireplace |
| <input type="checkbox"/> No heating system | <input type="checkbox"/> Something else (please specify): _____ |

2. How likely are you to switch your heating system to natural gas?

- ☐ Extremely likely
☐ Very likely
☐ Likely
☐ Not very likely
☐ Not at all likely

If you selected "Not very likely" or "Not at all likely" to switch your home heating system to natural gas, could you explain why?

If you indicated Extremely likely / Very likely / Likely to switch your home heating system to natural gas, please complete Questions 3A and 3B.

3A. Assuming natural gas service is made available to you, when would you likely switch your home heating to natural gas?

- ☐ Within the first 12 months of the availability
☐ Within 1 to 2 years of the availability
☐ Within 2 to 3 years of the availability
☐ After 3 years of the availability

3B. Please indicate your level of interest to switch to natural gas for each appliance.

	Extremely interested	Very interested	Interested	Not very interested	Not at all interested
Water heater	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fireplace	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Oven, range or stove	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clothes dryer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
BBQ	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4. Approximately how old is your heating system?

- ☐ 5 years or less
- ☐ 6 to 10 years old
- ☐ 11 to 15 years old
- ☐ 16 to 25 years old
- ☐ Over 25 years old

5. How likely are you to replace your home heating system in the next 2 years?

- ☐ Extremely likely
- ☐ Very likely
- ☐ Likely
- ☐ Not very likely
- ☐ Not at all likely

6. What is the main fuel source for heating your water?

- ☐ Propane ☐ Oil ☐ Electricity
- ☐ Other (please specify): _____

7. Is this a residence or a business?

- ☐ Residence
- ☐ Business
- ☐ Both residence and a business

8. Which of the following best describes the style of your house?

- ☐ A bungalow or a one story ranch ☐ A raised ranch ☐ A split level
- ☐ A two story ☐ A three story ☐ Some other style

9. How many square feet is your home (not including any unfinished basement)?

- ☐ Less than 1000 square feet ☐ 1000 – 1500 square feet
- ☐ 1501 – 2000 square feet ☐ Over 2000 square feet ☐ Don't know

10. In what year was your house built? Your best estimate is fine.

- ☐ 1950 or earlier ☐ 1951 - 1980
- ☐ 1981 or later ☐ Don't know

11. Do you rent or own this property?

☐ Own ☐ Rent

Please provide your contact information below.

Name:	
Telephone Number:	
Email Address:	
<i>Home Address</i>	<i>Mailing Address (if different)</i>
Address:	Address:
City:	City:
Postal Code:	Postal Code:

Thank you for completing the questionnaire.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe

Interrogatory

Reference:

[Ex. B, T1, Sch. 5]

Question(s):

- a) Please confirm that under the E.B.O. 188 Report on Natural Gas System Expansion Enbridge is able to complete a system expansion project that meets or exceed a PI of 0.8. If that is not correct, please explain.
- b) Please explain why Enbridge is requesting approval from the Board to charge a System Expansion Surcharge ("SES") to bring the PI to 1.0 if only a PI=0.8 is required.
- c) Please provide the SES charge and total SES revenue amount required if the project was approved on the basis of a PI=0.8?
- d) Please provide the SES charge and total SES revenue amount required (based on a PI=1) if all 176 customers were connected instead of just 86 as forecasted by Enbridge.

Response

- a) Confirmed. At paragraph 4.3.2 of the EBO 188 Final Report of the Board states "the Board finds that all projects must achieve a minimum threshold P.I. of 0.8 for inclusion in a utility's Rolling Project Portfolio." However, the Board's Report does not state that all projects must have a Profitability Index ("PI") of 0.8. Further, the Report of the Board requires the Company to maintain the PI of both the Investment Portfolio and Rolling Project Portfolio at a minimum of 1.0, plus a safety margin. If all expansion projects or a large portion of expansion projects were to proceed with a PI of 0.8 the minimum PI requirements for the Investment Portfolio and Rolling Project Portfolio could not be met.
- b) A Project PI of 0.8 implies that on a forecast basis that project will have a negative net present a value over the its expected life. This means that such a project would be subsidized by existing customers. The Company's System Expansion Surcharge

("SES") proposals previously reviewed by the Board have recognized this and have been approved by the Board. This is also consistent with the Board's findings in its EB-2016-0004 generic community expansion decision.¹

- c) It is likely that the provincial government would require that the \$1.8 million grant be reduced to account for the lower required PI of 0.8, while keeping the SES term at 40 years. In this case, the SES rate will remain unchanged at \$0.23/m³ and the total undiscounted SES revenue would be \$1,828,000. The revised grant in this case is estimated to be \$1,600,000.

Assuming no change to the provincial grant of \$1.8 million to account for the lower required PI of 0.8, the SES rate will remain unchanged at \$0.23/m³. An SES term of 23 years would be required to obtain a PI of 0.8 in year 40 of the project. The total undiscounted SES revenue would be \$1,001,000.

- d) It is possible that the provincial government would require that the grant be reduced or partially repaid to account for the increased connections, while keeping the SES term at 40 years. In this case, the SES rate will remain unchanged at \$0.23/m³ and the total undiscounted SES revenue would be \$3,526,000. The revised grant in this case is estimated to be \$1,200,000.

Assuming no change to the provincial grant of \$1.8 million to account for the increased connections, the SES rate will remain unchanged at \$0.23/m³. An SES term of 14 years would be required to obtain a PI of 1.0 in year 40 of the project. The total undiscounted SES revenue would be \$1,066,000.

¹ EB-2016-0004 Decision with Reasons (dated November 17, 2016), page 4, 18-19.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe

Interrogatory

Reference:

[Ex. B, T1, Sch. 1]

Enbridge indicates that this project received \$1.8 million of provincial grant funding and that this funding is included for purposes of OEB project approval and in calculating the PI.

Question(s):

- a) Please provide an update of the status of this funding (i.e. has Enbridge received this funding).
- b) Please summarise any risks to Ratepayers and/or Enbridge related to this funding.
- c) Please confirm that Ratepayers will not pay for any revenue shortfall or project overruns incurred for this project.

Response

- a) Please see Attachment 1 for a copy of Ontario Regulation 24/19 – Expansion of Natural Gas Distribution Systems. Section 6(1) of this regulation requires Enbridge Gas collect one dollar per month for each account that a consumer has with the Company, effective July 1, 2019. Section 6(4) of the regulation requires Enbridge Gas remit these amounts to the Independent Electricity System Operator (the “IESO”) each month. Enbridge Gas has been doing this since July 2019. Section 7 of the regulation sets out that once the IESO receives confirmation from the OEB that the necessary approvals referred to in section 2 of the regulation have been obtained in respect of a project listed in the regulation, the IESO shall distribute to the applicable gas distributor the amount of compensation to which it is entitled under subsection 36.2 (3) of the OEB Act for each fiscal quarter, calculated in accordance with section 5 of this regulation. Section 5 of the regulation sets out a formula that the IESO uses to determine the quarterly distribution of funds to the utilities undertaking the approved expansion projects.

- b) Enbridge Gas received its first payment under this regulation from the IESO in November 2019 in respect of three OEB approved expansion projects: Chippewas of the Thames First Nation, Scugog Island and the Chatham-Kent Rural Pipeline Expansion. Upon OEB approval of the Saugeen First Nation Community Expansion Project, funding for this project will begin to flow to Enbridge Gas as per the above noted funding formula and continue until the \$1.8 million of funding in respect of this project is remitted to Enbridge Gas.
- c) Given that Enbridge Gas expects the provincial government to honour the provisions of the legislation and regulations it has introduced to support natural gas expansion in the province, Enbridge Gas does not believe this funding is at risk.
- d) In its EB-2015-0179 Decision and Order¹ and subsequent community expansion decisions, the OEB has indicated that capital cost overruns for those community expansion projects could be brought forward by Enbridge Gas for inclusion in rate base at the time of rate rebasing. Enbridge Gas expects that the same will hold true for the Saugeen First Nation Expansion Project.

¹ EB-2015-0179 Decision and Order, August 10, 2017, p. 15

Français

ONTARIO REGULATION 24/19
made under the
ONTARIO ENERGY BOARD ACT, 1998

Made: March 7, 2019
Filed: March 8, 2019
Published on e-Laws: March 8, 2019
Printed in *The Ontario Gazette*: March 23, 2019

EXPANSION OF NATURAL GAS DISTRIBUTION SYSTEMS

Natural gas distribution system

1. For the purposes of section 36.2 of the Act and this Regulation,

“consumer” means a person who uses natural gas in Ontario for that person’s own consumption; (“consommateur”)

“natural gas distribution system” means a system for distributing natural gas by hydrocarbon pipeline in Ontario and includes any structures, equipment or other things used for that purpose. (“réseau de distribution de gaz naturel”)

Qualifying investment

2. For the purposes of the definition of “qualifying investment” in subsection 36.2 (1) of the Act, an investment is a qualifying investment if it is in respect of a project,

- (a) that is listed in Column 1 of the Table to Schedule 1, located as described opposite the project in Column 2 of the Table to Schedule 1; and
- (b) in respect of which the gas distributor has obtained all necessary approvals from the Board to authorize the expansion of a natural gas distribution system.

Consumers eligible for rate protection

3. For the purposes of subsection 36.2 (2) of the Act, a consumer who meets the following criteria is prescribed as eligible for rate protection:

- 1. As a result of the qualifying investment, the consumer is provided access or would be provided access to the natural gas distribution system of a gas distributor that has incurred costs related to the qualifying investment.
- 2. The consumer has no access to a natural gas distribution system or had no access to a natural gas distribution system before being provided the access referred to in paragraph 1.

Variance accounts

4. The IESO and gas distributors to which section 36 of the Act applies shall establish one or more variance accounts for the purposes of tracking amounts collected, remitted and distributed under this Regulation.

Calculation of rate reduction

5. (1) The IESO shall calculate the amount of rate reduction in respect of which a gas distributor is entitled to receive compensation for lost revenue under section 36.2 of the Act in accordance with this section.

(2) The amount of rate reduction shall be calculated in respect of each qualifying investment and in respect of each fiscal quarter by applying the following rules:

- 1. Subject to paragraph 2, the maximum amount of the rate reduction that may be provided over the course of all fiscal quarters is the amount set out in Column 3 of the Table to Schedule 1 opposite the project in respect of which the qualifying investment is made.
- 2. The maximum amount of the rate reduction that may be provided in respect of the fiscal quarter shall not exceed the amount of contributions collected by gas distributors from consumers and remitted by gas distributors to the IESO in respect of the fiscal quarter.
- 3. The following steps shall be taken to determine the amount:
 - i. Determine the remaining value for the qualifying investment by applying the following formula:

$$A = B - C$$

Where,

A = the remaining value for the qualifying investment,

B = the amount set out opposite the qualifying investment in Column 3 of the Table to Schedule 1, and

C = the sum of all amounts of rate reduction provided under section 36.2 of the Act during all previous quarters in respect of the qualifying investment.

ii. Determine the amount of rate reduction by applying the following formula:

$$D = A \div E \times (F + G - H)$$

Where,

D = the amount of rate reduction,

A = the remaining value for the qualifying investment, as determined under subparagraph i,

E = the sum of the remaining value for the qualifying investment and the remaining values for all other qualifying investments, each as determined under subparagraph i,

F = the sum of the monthly amounts collected by gas distributors from consumers under section 6 and remitted to the IESO in respect of the quarter,

G = any interest accumulated in respect of the quarter in the IESO's variance account referred to in section 4, and

H = reasonable costs of the IESO related to its activities under this Regulation in respect of the quarter.

Collection from consumers of amounts to compensate gas distributors

6. (1) Subject to subsection (6), each gas distributor to which section 36 of the Act applies shall, in order to provide for the contributions payable by consumers under subsection 36.2 (4) of the Act, collect from each of their consumers the amount of one dollar per month for each account that the consumer has with the gas distributor.

(2) Subject to subsection (3), the gas distributor shall aggregate the amount mentioned in subsection (1) together with the amount that the gas distributor collects from the consumer as a fixed customer charge or fixed monthly service charge and display the total amount on the consumer's bill as one amount under that charge.

(3) If a gas distributor does not provide for a fixed customer charge or fixed monthly service charge on the consumer's bill, the gas distributor shall aggregate the amount mentioned in subsection (1) together with the amount that the gas distributor collects from the consumer in respect of any other charge.

(4) Each gas distributor shall collect the amounts referred to in subsection (1) and remit the amounts to the IESO each month.

(5) Once the total of the maximum amounts of rate reduction set out in Column 3 of the Table to Schedule 1 has been distributed to the gas distributors by the IESO, the IESO shall notify the Board and the gas distributors.

(6) As soon as it is reasonably practicable to do so after receiving notification under subsection (5), the gas distributors shall cease collecting from consumers the charge and remit to the IESO any amounts that have been collected but not yet remitted.

IESO to distribute amounts collected

7. Once the IESO receives confirmation from the Board that the necessary approvals referred to in section 2 have been obtained in respect of a project in respect of which a qualifying investment is made, the IESO shall distribute to the applicable gas distributor the amount of compensation to which it is entitled under subsection 36.2 (3) of the Act for each fiscal quarter, calculated in accordance with section 5 of this Regulation.

Money collected in excess, interest

8. (1) This section applies if gas distributors have collected an amount of rate reduction under section 6 that exceeds the amount required to compensate gas distributors and have remitted the amount in excess to the IESO.

(2) The IESO shall deduct from the amount in excess the reasonable costs of the IESO related to its activities under this Regulation that have not been deducted previously.

(3) After making the deduction under subsection (2), the IESO shall return the remaining amount in excess to the gas distributors, having regard to the total amount collected by each gas distributor from consumers under section 6 relative to the total amounts collected by all gas distributors under that section.

(4) The IESO shall apply any interest earned on amounts included in its variance account by adding the interest to the amounts mentioned in subsection (3) to be returned to gas distributors.

(5) Gas distributors shall report to the Board with respect to the amounts returned to them under this section.

Information, etc.

9. (1) The IESO is prescribed for the purposes of subsection 36.2 (5) of the Act.

(2) The following persons or entities shall provide information and reports requested by the Minister to the Minister:

1. Each gas distributor making a qualifying investment.
2. The IESO.
3. The Board.

(3) The following persons or entities shall provide information and reports requested by the Board to the Board:

1. Each gas distributor making a qualifying investment.
2. The IESO.

(4) The information and reports mentioned in subsections (2) and (3) shall be provided within the time specified by the Minister or the Board, as the case may be, in the request.

Information, IESO

10. For the purposes of this Regulation, the IESO shall rely on the information provided to it by gas distributors.

Commencement

11. This Regulation comes into force on the latest of the following:

- 1. The day section 1 of the *Access to Natural Gas Act, 2018* comes into force.**
- 2. July 1, 2019.**
- 3. The day this Regulation is filed.**

SCHEDULE 1

Item	Column 1 Name of project in respect of which investment is made	Column 2 Location of project	Column 3 Maximum amount of rate reduction, in dollars
1.	Southern Bruce Project being developed by EPCOR Southern Bruce Gas Inc.	Southern Bruce County with some facilities in Grey County	22,000,000
2.	Cornwall Island Project being developed by Enbridge Gas	Cornwall Island	3,450,000
3.	Chippewas of the Thames First Nation Project being developed by Union Gas	On or adjacent to the Chippewas of the Thames First Nation Reserve, Middlesex County	1,430,000
4.	Saugeen First Nation Project being developed by Union Gas	Saugeen First Nation and adjacent areas, Bruce County	1,800,000
5.	Scugog Island Project being developed by Enbridge	Community of Scugog Island, Township of Scugog, Regional Municipality of Durham	6,420,000
6.	Hiawatha First Nation Project being developed by Enbridge	Hiawatha First Nation and parts of the Township of Otonabee-South Monaghan	3,140,000
7.	North Shore and Peninsula Roads Project being developed by Union Gas	Northshore Rd. and Peninsula Rd. areas of the City of North Bay	8,670,000
8.	Chatham-Kent Rural Pipeline Expansion being developed by Union Gas	The former Dover Township in the Municipality of Chatham-Kent	8,000,000
9.	Natural Gas Access for Northern Mining Operations (Taylor Mine) being developed by Union Gas	Taylor Mine Site of Kirkland Lake Gold, Corporation of the Township of Black River-Matheson	1,600,000

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Back to top

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe

Interrogatory

Reference:

[Ex. B, T1, Sch. 1]

Question(s):

Enbridge indicates that it is receiving a provincial grant of \$1.8 million for the project. Enbridge also indicates that the Government grant will offset the year one cost for a net capital investment by Enbridge Gas of \$1.5 million over the 10 years. Please explain why these figures do not match.

Response

These figures are not intended to match. The provincial grant for the Project is \$1.8 million. The net capital investment by Enbridge Gas is \$1.5 million. The net capital investment of \$1.5 million is calculated as the gross capital investment of the preferred design of \$3.3 million minus the provincial grant of \$1.8 million.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe

Interrogatory

Reference:

[Ex. B, T1, Sch. 6]

Question(s):

Please provide an estimated timeline for obtaining all outstanding permits and approvals required to construct this project.

Response

All permits and approvals will be obtained in the first quarter of 2020 prior to construction.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe

Interrogatory

Reference:

On December 17, 2019 the Board published the Minister's letter and notice that supports additional Potential Projects to Expand Access to Natural Gas Distribution in Ontario⁶.

Question(s):

- a) What is the potential to provide natural gas access to additional communities from the proposed pipeline?
- b) If all 176 potential customers attached for service, what capacity would be left for additional community expansion and/or reinforcement purposes?

Response

- a) Please see Exhibit I.STAFF.3. No additional communities have the potential to be served from this pipeline.
- b) Please see Exhibit I.STAFF.3. It should be noted that the main purpose of upsizing a majority of pipe to NPS 4 is to provide capacity for the potential of future growth noted by the local chief and council, not reinforcement for the existing Southampton system. If the pipe is installed as all NPS 2 there would be very limited capacity for any future growth on the system.

⁶<https://www.oeb.ca/industry/policy-initiatives-and-consultations/potential-projects-expand-access-natural-gas>

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe

Interrogatory

Reference:

Board Staff IR #10 references draft Conditions of Approval and indicates that a final monitoring report should be completed and filed no later than fifteen months after the in-service date. Enbridge will know how many customers have attached and have a significantly better understanding of additional connections at the time this report is completed and filed.

Question(s):

In addition to the draft Conditions of Approval prepared by Board Staff, would Enbridge oppose including the conditions as outlines below? If Enbridge does not agree with the draft conditions of approval noted below, please identify the specific conditions that Enbridge disagrees with and explain why. For conditions in respect of which Enbridge would like to recommend changes, please provide the proposed changes and an explanation of the changes.

6 (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:

vi. include a summary of all customers connected and those expected to be connected by customer type, including a variance explanation if these differ from the forecast included in the application.

vii. provide a summary of all Demand Side Management marketing activities provided to consumers in this community and a summary of uptake on those programs.

viii. Provide a copy of the completed report to all parties of this proceeding.

Response

Enbridge Gas does not believe the added conditions are required. As stated in the response to Exhibit I.STAFF.10, Enbridge Gas will comply with all Conditions of Approval as mandated by the OEB in its Decision with Reasons specific to this proceeding.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff ("Staff")

Interrogatory

Reference:

Exhibit B, Tab 1, Schedule 1, page 2

Preamble:

Enbridge Gas proposes the extension of the single, volumetric-based system expansion surcharge (SES), as approved by the OEB in Union Gas Limited's 2015 Community Expansion Project, EB-2015-0179, to the Project.

Question(s):

- a) Please confirm that all of the terms of the previously approved SES will be extended to the Project without exception. If not, please identify, explain and justify any differences.
- b) Further to question a) above, please specifically confirm that the profitability index (PI) of the Project will be tracked, and if customer additions are greater than forecast and the PI reaches 1.0 before the end of the 40 year term that the SES would be terminated at that time.

Response

- a) Enbridge Gas confirms that the terms of the previously approved SES will be extended to the Project.
- b) In the EB-2015-0179 Decision with Reasons, the OEB indicated that it will require the Company to provide a revised DCF calculation and PI based on actual project cost and revenues after the 10-year forecast risk period is over in the event that the Company seeks to recover any revenue requirement shortfall. The OEB stated that it would determine the appropriate revenue recovery methodology at that time.¹

¹ EB-2015-0179 Decision with Reasons, August 7, 2017, p. 14

Enbridge Gas expects that this treatment will continue for the Union rate zones until rate harmonization is realized.

A different treatment was approved by the OEB in its approval of the SES in Enbridge Gas Distribution's EB-2017-0147 Fenelon Falls leave to construct Decision. In this matter the OEB accepted the Company's proposal to periodically recalculate the project's PI based on actual revenues attributable to the project and in the event the recalculated PI exceeded 1.0 the duration of the SES period could be reduced. As in the case of the Union rate zones, Enbridge Gas expects that this treatment will continue for the EGD rate zone until rate harmonization is realized.

Given that the Saugeen First Nation Project is located in the Union South rate zone, Enbridge Gas submits that the treatment approved in the OEB's EB-2015-0179 Decision should apply in this matter.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff ("Staff")

Interrogatory

Reference:

Exhibit B, Tab 1, Schedule 1, page 6

Preamble:

Enbridge Gas states that it will obtain a Section 28 (2) permit from Indigenous and Northern Affairs Canada (INAC) to install the Proposed Facilities within the Saugeen First Nation.

Question(s):

Please provide an update on the status of Enbridge Gas' application for a Section 28 permit from INAC.

Response

On July 2, 2019, Enbridge Gas reached out to INAC to determine and confirm the next steps required to obtain a Section 28(2) permit. The INAC representative responded that same day advising Enbridge Gas that the Saugeen First Nation land manager drafts the permit document based on negotiations with the Company.

On September 6, 2019, an Enbridge Gas representative contacted Saugeen First Nation and followed up with an email to its land manager. In response to this correspondence, the Saugeen First Nation representative requested a copy of the July 2019 INAC email.

Enbridge Gas is currently waiting for the Saugeen First Nation land manager to complete the Section 28(2) permit. Based on the ongoing consultation with the Saugeen First Nation, Enbridge Gas is unaware of any issue that would impede the issuance of this Section 28 (2) permit.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff ("Staff")

Interrogatory

Reference:

Exhibit B, Tab 1, Schedule 3, page 1

Preamble:

Enbridge Gas states that in the future, it may use the Saugeen First Nation system as an alternative feed into the adjacent Southampton distribution network. This may provide for additional security of supply into Southampton but also for future reinforcement of the system. As a result, Enbridge Gas is proposing to upsize the facilities proposed in this application.

Question(s):

- a) How much additional capacity will the upsize provide (i.e., how many additional m³/yr)?
- b) Please provide evidence of the future demand that will be supplied by the addition capacity that the upsize would provide (e.g., customer attachment forecast).

Response

- a) The additional capacity is expected to range from approximately 500-900 m³/hour for the distribution network, depending on the actual attachment locations. Alternatively, if the system is installed as all NPS 2 pipe, there is very limited capacity for any customer additions beyond the existing forecast.
- b) The evidence supporting this future demand came as a result of discussions with the Saugeen First Nation Chief and Band Council. This future growth is mentioned in pre-filed evidence at Exhibit B, Tab 1, Schedule 3, Section 3.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff ("Staff")

Interrogatory

Reference:

Exhibit B, Tab 1, Schedule 5, page 1

Preamble:

Enbridge Gas states that capital cost used in the discounted cash flow analysis is the cost of the minimum sized facilities to support the customer attachment forecast for the Project and not the additional \$777,000 required to upsize the facilities as part of system reinforcement.

Question(s):

- a) Please confirm that the additional cost of the upsizing has no bearing on the term of the SES nor the PI of the Project.
- b) Please explain how Enbridge Gas will recover and account for the additional \$777,000?

Response

- a) Confirmed. The calculation of the term of the SES and the PI of the Project was based on the cost of the minimum sized facilities.
- b) The Project costs will be included in Enbridge Gas's rate base and recovered in rates as part of its next rebasing proceeding. The allocation and recovery of the Project costs will be subject to review as part the next rebasing proceeding.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff ("Staff")

Interrogatory

Reference:

Exhibit B, Tab 1, Schedule 6, page 1

Preamble:

Enbridge Gas states that the design specifications are in accordance with the Ontario Regulations 210/01 under the Technical Standards and Safety Act 2000, Oil and Gas Pipeline Systems. This is the regulation governing the installation of pipelines in the Province of Ontario.

Question(s):

Has Enbridge Gas obtained a letter from the Technical Standards and Safety Authority (TSSA) indicating that the TSSA has no issues with the design of the Project? If so, please file the letter into evidence. If not, please explain why not and indicate if / when Enbridge Gas anticipates receiving the letter.

Response

Please see Attachment 1.



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July 10, 2018

George Leferman, P.Eng.
Advisor, Planning & Design – Community Expansion
50 Keil Drive North, Chatham, ON N7M 5J5

SR# 2335122

Re: Saugeen First Nation Natural Gas Pipeline Project

Dear Mr. George Leferman,

This is in response to your submitted Union Gas Pipeline Project dated June 26, 2018 about the Saugeen First Nation Natural Gas Pipeline Project.

I reviewed submitted technical information of the project which were in compliance to the requirements of applicable standard CSA Z662-15 and of Oil and Gas Code Adoption Document, FS-238-18. This project might subject to audit and site visit by TSSA inspector.

Should you have any questions, please contact me at 416.734.3539 or by e-mail at kmanouchehri@tssa.org. When contacting TSSA regarding this file, please refer to the Service Request number provided above.

Yours truly,

Kourosh Manouchehri, P.Eng.,
Fuels Safety Engineer
Tel. : (416) 734-3539
Fax : (416) 231-7525

c. Ms. Zora Crnojacki
Chairperson, OPCC
Ontario Energy Board
P.O. Box 2319
2300 Younger Street, 27th. Floor
Toronto, ON M4P 1E

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff ("Staff")

Interrogatory

Reference:

Exhibit B, Tab 1, Schedule 6, page 2

Preamble:

Enbridge Gas states that approvals are pending from the Saugeen First Nations, the Municipality of Arran-Elderslie, the Town of South Bruce Peninsula, Ministry of Transportation Ontario, Ministry of Tourism - Culture and Sport, Ministry of Natural Resources & Forestry, Saugeen Valley Conservation Authority, and Grey Sauble Conservation Authority.

Question(s):

Please provide an update on the status of these approvals.

Response

The Municipality of Arran-Elderslie and the Town of South Bruce Peninsula are aware of the Project scope. Municipal consent will be obtained prior to construction from both. The Ministry of Transportation (MTO) has reviewed and provided preliminary feedback on Project scope. A permit will be obtained from MTO prior to construction, for the section on Highway 21 along the pipeline route.

One archaeological approval is pending from the Ministry of Heritage, Sport, Tourism and Cultural Industries for the Stage 1-2 Archaeological Assessment conducted on the north right-of-way (ROW) of Highway 21 between French Bay Road and Craig Street and the south ROW of Denny's Dam Road. The assessments of Highway 21 and Denny's Dam Road as described above took place on July 12, 2019 and no artifacts were discovered. The Archaeological Assessment Report was submitted to the Ministry on August 9, 2019. Archaeological approvals for the remainder of the pipeline route were received from the Ministry on March 12, 2019 and November 15, 2019.

There are no approvals required from the Ministry of Natural Resources & Forestry.

Permits will be obtained from the Saugeen Valley Conservation Authority (SVCA) and the Grey Sauble Conservation Authority (GSCA) prior to construction for all watercourse and regulated area crossings along the pipeline route. The permit applications will be submitted to the SVCA and the GSCA in the near future.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff ("Staff")

Interrogatory

Reference:

Exhibit B, Tab 1, Schedule 7, page 1
Exhibit B, Tab 2, Schedule 12

Preamble:

Enbridge Gas states that a copy of the Environmental Protection Plan has been submitted to the Ontario Pipeline Coordinating Committee (OPCC), local municipalities, government agencies, and Indigenous communities. A summary of comments received by Enbridge Gas prior to filing and its corresponding responses are provided in evidence.

Question(s):

Please provide an update on any communications with the OPCC since the application was filed with the OEB.

Response

There have been no communications with the OPCC since the application was filed with the OEB and there are no outstanding concerns.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff ("Staff")

Interrogatory

Reference:

Exhibit B, Tab 1, Schedule 7, page 3

Preamble:

Enbridge Gas states that it retained a licensed Archaeologist to complete an Archaeological Assessment for the Project. The Archaeological Assessment Report (AA Report) was submitted to the Ministry of Tourism, Culture and Sport on January 30, 2019 and approval was received on March 12, 2019.

The AA Report concluded that future assessments are required on Denny's Dam Road and on Highway 21 between French Bay Road and Craig Street and the proposed pipeline route outside of these two areas should be considered free of archaeological concern. The assessments of Highway 21 and Denny's Dam Road as described above took place on July 12, 2019 and no artefacts were discovered. A subsequent report with these assessments was submitted to the Ministry of Tourism, Culture and Sport and is currently under review. After this submission a minor change to the pipeline route on B Line occurred requiring additional assessment by a licensed Archaeologist. Once this additional assessment is complete a report will be submitted to the Ministry of Tourism, Culture and Sport for review. If the extent of the Proposed Project Area changes to incorporate lands not addressed in previous Archaeological Assessments, further assessment will be completed as required

Question(s):

Please provide an update on the status of the Archaeological Assessment(s) for the Project.

Response

The Archaeological Assessment of Denny's Dam Road and Highway 21 between French Bay Road and Craig Street is still under review with the Ministry of Heritage, Sport, Tourism and Cultural Industries. A Stage 1-2 Archaeological Assessment was

completed for the above referenced pipeline route change on B Line and the report was submitted to the Ministry on November 4, 2019 and Ministry approval was received on November 15, 2019. Please see Exhibit I.STAFF.6 for more information pertaining to the Archaeological Assessments for the Project.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff ("Staff")

Interrogatory

Reference:

The application does not make mention of energy efficiency opportunities or programs.

Question(s):

- a) Please confirm that, if the current application is approved, then customers of the Project will fall under Enbridge Gas' existing demand side management programs.
- b) Does Enbridge Gas anticipate that customers of the Project that convert to natural gas will purchase new appliances / equipment as part of the conversion process? Please explain what implications this could have in terms of energy efficiency.

Response

- a) Confirmed.
- b) Yes, it is expected that customers converting to natural gas would be required to purchase and install natural gas equipment. These customers will be eligible for the current DSM program offerings. Given the small quantity of new potential customers for DSM programs, it would be expected to have an immaterial impact on overall energy efficiency results.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff ("Staff")

Interrogatory

Reference:

Exhibit A, Tab 2, Schedule 1

Preamble:

The OEB Act permits the OEB, when making an order, to "impose such conditions as it considers proper."¹

Question(s):

OEB staff has prepared the following draft Conditions of Approval. If Enbridge does not agree to any of the draft conditions of approval noted below, please identify the specific conditions that Enbridge disagrees with and explain why. For conditions in respect of which Enbridge would like to recommend changes, please provide the proposed changes and an explanation of the changes.

**Enbridge Gas Inc.
Saugeen First Nation Project
OEB Act Sections 36 Rates and 90 Leave to
Construct **DRAFT** CONDITIONS OF APPROVAL**

1. Enbridge Gas Inc. (Enbridge Gas) shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in EB-2019-0187 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) Enbridge Gas 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;

¹ OEB Act, s. 23

- 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. Enbridge Gas 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. Enbridge Gas shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Enbridge 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. Enbridge Gas shall file, in the proceeding where the actual capital costs of the project are proposed to be included in rate base, 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.
 - 6. Both during and after construction, Enbridge Gas 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 Enbridge Gas' 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 Enbridge Gas, 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, licenses, 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 Enbridge Gas' 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 Enbridge Gas, including the date/time the complaint was received; a description of the complaint; any actions taken to address the complaint; and the rationale for taking such actions.

Response

Enbridge Gas has reviewed the draft conditions of approval proposed by OEB Staff and has no changes to recommend. Enbridge Gas will comply with all conditions set out by the OEB.