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June 4, 2020

Sent By Electronic Mail and RESS Electronic Filing

Ms. Christine E. Long
Registrar & Board Secretary
Ontario Energy Board
27-2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EPCOR Natural Gas Limited Partnership (“ENGLP”) Southern Bruce Project
EB-2018-0263 Decision and Order Condition of Approval No. 4**

We write the Ontario Energy Board (“Board”) with respect to ENGLP’s obligations pursuant to Condition of Approval No. 4, and to advise of ENGLP’s intent to proceed with its 2020 Stage 2 construction activity in areas where archeological clearance has been confirmed by ENGLP’s licensed archeologists, and considered low risk for archeological finds. The areas where ENGLP intends to proceed with construction are unrelated to areas of high potential and interest specific to Inverhuron. Condition of Approval No. 4 states that:

Authorization for leave to construct on the portions of the project route requiring further archeological assessment is granted conditional of ENGLP filing with the OEB clearance letter from the Ministry of Tourism, Culture and Sport for those portions requiring further assessment prior to the commencement of construction.

ENGLP has completed its 2020 Stage 2 Archeological Assessment for the “backbone” of the Facilities¹ that traverse the Municipality of Kincardine (“Stage 2 Assessment”). The Stage 2 Assessment has been completed on the segments of the backbone that showed archeological potential as concluded from the Stage 1 Archeological Assessment completed in 2019. The Stage 2 Assessment concluded that there are no areas of archeological interest that require further archeological investigation.

The Stage 2 Assessment was completed by licensed archeologists employed by Stantec Consulting (“Stantec”). Stantec has completed all archeological work to date in consultation with the Saugeen Ojibway Nation archeological representatives.

The portion of the pipeline backbone included in the Stage 2 Assessment within Kincardine is considered a low risk area for archeological finds due to the nature of the terrain and the fact that the areas were all previously disturbed (e.g. residential lawns, streets, sidewalks).

Separate from the areas where ENGLP intends to proceed with its 2020 Stage 2 construction activity, ENGLP continues to evaluate other areas previously identified as areas of high potential. These areas

¹ The “Facilities” are as defined throughout ENGLP’s application and the July 11, 2019 Decision and Order of the Board in the EB-2018-0263 proceeding. The “backbone” refers to the 6-inch and 8-inch portions of the mainline distribution system.

of interest are specific to Inverhuron, and ENGLP does not intend to proceed with Stage 2 construction activity in the Inverhuron area at this time. ENGLP will notify the Board of the results of that investigation as soon as they are available.

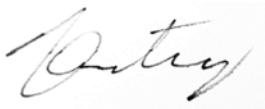
ENGLP's intent to commence construction on specific portions of the Facilities included in the Stage 2 Assessment is supported by the conclusions of reports of Stantec's licensed archeologists. ENGLP will submit all archeological reports to the Ministry of Tourism, Culture and Sport ("MTCS") and will continue to submit all clearance letters to the Board, consistent with notifications pursuant to its Conditions of Approval. A list of these letters is included at Appendix A to this letter.

For the reasons stated above, ENGLP submits that it is highly unlikely that the areas where it intends to proceed with Stage 2 construction activity will require further assessment. ENGLP may face a delay of several weeks awaiting formal clearance from the MTCS, and MTCS may simply enter the findings into record without providing an explicit clearance letter to ENGLP. Such delay in the middle of the construction season may lead to more severe and undesirable delays to the connection of services for future customers of the utility in the Southern Bruce area.

Throughout the execution of its construction activities, ENGLP has and will continue to follow all precautions and will immediately issue stop work orders if any portion of the work uncovers any archeological find.

ENGLP respectfully requests that the Board, or a staff member delegated authority of the Board, provide a timely review of this intent to proceed letter and confirm to ENGLP that this approach is acceptable.

Sincerely,



Vince Cooney, P.Eng, MBA
Senior Manager, Regulatory Affairs, Ontario
EPCOR Utilities Inc.
(647) 730 – 0013

cc. All Parties to EB-2018-0263
Andrés Zumbado, Project Manager, EPCOR
Ryan Litwinow/Bruce Brandell/Susannah Robinson
Britt Tan/Daniela O'Callaghan, Legal Counsel, EPCOR
Richard King, Olser, Hoskin & Harcourt (Applicant's Counsel)
Nancy Marconi/Zora Crnojacki/Azalyn Manzano, OEB Staff

APPENDIX “A”
CORRESPONDENCE WITH RESPECT TO CONDITION OF APPROVAL NO. 4

June 21, 2019:

- ENGLP submitted its clearance letter from the Ministry of Tourism, Culture and Sport (“MTCS”) confirming the fieldwork and reporting for the Stage 1 Archeological Assessment was consistent with the MTCS’s 2011 Standards and Guidelines for Consultant Archaeologists and the terms and conditions of the archaeological licenses.

August 8, 2019:

- ENGLP submitted its clearance letter from the MTCS confirming that the fieldwork and reporting for the 2019 Stage 2 Archeological Assessment was consistent with the MTCS’s 2011 Standards and Guidelines for Consultant Archaeologists and the terms and conditions of the archaeological licenses.

September 26, 2019:

- ENGLP submitted its clearance letter from the MTCS confirming the fieldwork and reporting for the 2019 Stage 3 Archeological Assessment was consistent with the MTCS’s 2011 Standards and Guidelines for Consultant Archaeologists and the terms and conditions of the archaeological licenses.