



July 21, 2020

Re: Windsor Line Replacement Project - TSSA file SR# 2875728 - OEB file number: EB-2019-0172

The applicable regulation that applies to Windsor Line Replacement Project is [Ontario Regulation 210/01: Oil and Gas Pipeline Systems](#). The applicable standard for this project is CSA Z662-15 which TSSA adopted under [FS-238-18 - Oil and Gas Pipelines CAD Amendment \(February 15, 2018\)](#). The mentioned Code Adoption Documents (CAD) specifies the standards that are adopted by TSSA and any changes or addition to the requirements of CSA Z662-15.

TSSA audits all utility companies that are licensed to distribute “gas” in the province of Ontario. Last audit of Enbridge Gas Inc. (EGI) was in September 2017. The interval of the mentioned audits were every five years. TSSA is in process of drastically changing the interval and process of the audits by end of 2020. The new audit format will be risk-based approach and rates the performance of the utility companies. TSSA also reviews and audits all new pipeline projects that are submitted to OEB for leave to construct. The review of the new pipeline projects submitted to OEB consist of reviewing the technical aspect of the project and focused on compliance to the adopted standards and O.Reg.210/01. TSSA has authority to issue order to operator for any non-compliances to the regulation and/or adopted standards.

A review of the raised issue on this project:

- a) Depth of cover: Depth of cover for distribution network is defined by table 12.2 of CSA Z662-15
- b) Pipeline abandonment: The requirements for abandon distribution pipeline are defined by section 12.10.3.4 of CSA Z662-15

This project so far has been reviewed on the technical aspects of the project including design, material specification, wall thickness calculation and required depth of cover. In general, TSSA is in support of this project for the following reason(s):

- a) Even if there are no requirements in CSA Z662 in terms of the age of the pipeline, it is known to TSSA that there are many issues related to old pipelines that drive from the material, welding, construction and coating available at the time of construction. Also, some pipelines due to their condition can be more vulnerable to internal and external corrosion. If the operator finds that the old pipeline needs to be replaced with new line,

this is great safety improvement for public as the new line will be built by better material, welding, latest technology and better coating material comparing to 50 or 60 years ago.

- b) Managing the operational risk: In addition to the vintage of the pipeline , the Windsor Line has been deemed by operator an operational risk. The replacement of the proposed section of the Windsor Line is considered by operator the most effective way of managing its ongoing safety and reliability.
- c) The issue around conflicts with other utilities at similar depths (e.g. water, storm, fibre optics, etc) precipitates a high likelihood of requiring temporary support of existing utilities if exposed at tie-in locations or service connections is a valid concern.

TSSA will audit and inspect the EGI to ensure compliance with applicable technical and safety standards for construction and operation of this project.

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,



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