

Filed: 2020-07-24
Section 101
EB-2020-0160

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Energy Board Act, 1998*, S.O. 1998,
c. 15 (Schedule B);

AND IN THE MATTER OF an application by Enbridge Gas Inc.
pursuant to Condition 4 from the Ontario Energy Board's
Decision and Order, and Section 101 of the *Ontario Energy
Board Act, 1998* for authority to construct a work upon, under
or over a highway, utility line or ditch in the County of Essex for
the purposes of a natural gas pipeline in respect of which the
Ontario Energy Board granted leave to construct in EB-2019-
0172 to Enbridge Gas Inc.;

**RESPONSE OF THE INTERVENOR
THE CORPORATION OF THE COUNTY OF ESSEX**

DAVID M. SUNDIN
LSO # 60296N
JOSEPHINE STARK
LSO # 24691J
McTAGUE LAW FIRM LLP
Barristers & Solicitors
455 Pelissier Street
Windsor, Ontario N9A 6Z9
(T) 519-255-4344
(F) 519-255-4384
(E) dsundin@mctaguelaw.com

LAWYERS FOR THE CORPORATION
OF THE COUNTY OF ESSEX

INDEX

TAB NO.	DESCRIPTION
1	Summary of Position of the Corporation of the County of Essex
2	Affidavit of Jane Mustac with exhibits attached thereto Exhibit "A": Franchise Agreement dated December 11, 1957 Exhibit "B": Minutes from May 15, 2019 Meeting Exhibit "C": Email to Enbridge dated June 28, 2019 Exhibit "D": Email exchange dated August 1, 2019 Exhibit "E": Page from EA and sketch received July 22, 2019 Exhibit "F": Email exchange ending September 18, 2019 Exhibit "G": Email exchange ending September 27, 2019 Exhibit "H": Email exchange ending October 18, 2019 Exhibit "I": Email from Enbridge dated November 7, 2019 Exhibit "J": Email exchange ending December 5, 2019 Exhibit "K": Email exchange re: Meeting of February 6, 2020 Exhibit "L": Email from Enbridge Exhibit "M": Initial Road User Agreement Exhibit "N": Email from Krystal Kalbol dated April 8, 2020 Exhibit "O": Report dated May 1, 2020 Exhibit "P": Response of Haddad Morgan dated May 7, 2020 Exhibit "Q": Second Enbridge Report dated May 14, 2020 Exhibit "R": Second Haddad Morgan Response dated May 19, 2020 Exhibit "S": Third Enbridge Report provided May 19, 2020 Exhibit "T": Third Haddad Morgan Response dated May 29, 2020 Exhibit "U": Administrative Report to Counsel dated May 20, 2020 Exhibit "V": By-law 2020-23
3	Affidavit of Dr. William Tape Exhibit "A": Curriculum Vitae of William Tape Exhibit "B": Form A – Acknowledgement of Expert's Duty Exhibit "C": Report of Haddad Morgan dated May 7, 2020 Exhibit "D": Report of Haddad Morgan dated May 19, 2020 Exhibit "E": Report of Haddad Morgan dated May 29, 2020
4	EB2020-0160 Notice of Hearing & Procedural Order No. 1 dated June 30, 2020
5	TAC Guidelines
6	CSA Standards - 2019