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**Enbridge Gas Inc.**  
500 Consumers Road  
North York, Ontario M2J 1P8  
Canada

August 20, 2020

**VIA EMAIL and RESS**

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

Dear Ms. Long:

**Re: Enbridge Gas Inc. (Enbridge Gas)  
Ontario Energy Board (Board) File No.: EB-2020-0160  
Windsor Pipeline Replacement Project ("Project") – Section 101 Application  
Corrected Interrogatory responses**

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Further to the interrogatory responses filed by Enbridge Gas on August 14, 2020, attached please find the corrected interrogatory response at Exhibit I.EP.4.

Please contact the undersigned if you have any questions.

Yours truly,

(Original Digitally Signed)

Rakesh Torul  
Technical Manager,  
Regulatory Applications

cc: EB-2020-0160 Intervenors

ENBRIDGE GAS INC.  
Answer to Interrogatory from  
Energy Probe (EP)

INTERROGATORY

Reference:

Exhibit A, Tab 2, Sch. 1, Page 6, Paragraph 22

Preamble:

*"Essex County chose not to participate in the LTC Application even though it was aware its position on the depth of cover would not(be) meeting the following circumstances:*

- a. were not required to meet the CSA Z662;*
- b. were not required to ensure the safety of persons or property;*
- c. were not consistent with the purpose and intent of the existing 1957 Franchise Agreement (Exhibit B, Tab 1, Schedule 3, Appendix A); and*
- d. That Enbridge Gas would not readily agree to such demands."*

Question:

- a) Please confirm that Enbridge was aware of the position of Essex County at the time of the EB- 2019-0172 LTC proceeding.
- b) Did Enbridge inform the OEB of the position of Essex County during the EB-2019-0172 LTC proceeding? If the answer is yes, please file copies of any documents or Technical Conference transcript references where Enbridge informed the OEB of the position of Essex County. If the answer is no, please explain why not.

Response:

- a) Yes, Enbridge Gas was aware of the position of Essex County with respect to its preference for additional depth at the time of the EB-2019-0172 proceeding. However, the use of the TAC Guidelines as a required standard was not known until April 8, 2020.
- b) No, as indicated in the evidence in the LTC proceeding Enbridge Gas was continuing discussions with municipalities of Tecumseh, Lakeshore, Chatham-Kent and Essex County in varying regards to consent for execution of the project. Several

Municipalities provided letters of support for the project and these were included in the original LTC application. Route refinement with municipalities are typically managed through the municipal consent/permit process.