

## ONTARIO ENERGY BOARD

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

**AND IN THE MATTER OF** an application by Enbridge Gas Inc., for an order granting leave to construct natural gas pipeline and associated facilities.

### **INTERROGATORIES OF THE CORPORATION THE COUNTY OF MIDDLESEX**

#### **I: INTERROGATORIES TO THE APPLICANTS**

**On October 22, 2020, the County of Middlesex requested intervenor status for the London Lines Replacement Project, Ontario Energy Board hearing. Status was granted on October 29, 2020 and the County wishes to submit a request for any relevant information and documents from Enbridge by the November 10, 2020 deadline.**

NATURAL GAS PIPELINES: ROUTE, ENGINEERING PRINCIPLES, ENVIROMENTAL STANDARDS & CONSTRUCTION PLANS

1. Please provide detailed engineering drawings showing the exact location of the section of line that is proposed to run through or in close proximity to the intersection of Komoka Road and Glendon Drive, including all material and construction specifications, and any other items related to the proposed infrastructure.
2. Please provide a fulsome explanation and any and all evidence of evaluations or considerations made by the Applicant of the pre-approved “Glendon Drive Streetscape Schedule C Municipal Class Environmental Assessment” prior to the Applicant setting out the proposed potential route for the pipeline.
3. Please identify and explain in full any and all potential or likely hardships or liabilities, financial or otherwise, that the proposed route for the pipeline is likely to have on the County of Middlesex and nearby land owners.
4. Is the Applicant exploring any alternatives to the proposed location for the infrastructure, including any private easements, temporary lines, non-standard locations within the municipal road rights-of-way, waiver of costs, or other potential solutions that would alleviate the hardships identified in the Applicant’s answer to question #3 above? Please explain in full.

5. How does the Applicant intend to protect the County of Middlesex and nearby landowners from any and all potential or likely hardships or liabilities that the Applicant identified in its answer to Question #3 above? Please explain in full.

November 10, 2020

**THE CORPORATION OF THE  
COUNTY OF MIDDLESEX**

**Wayne P. Meagher** (LSUC#: 56418A)  
Middlesex County Barrister & Solicitor's Office  
Middlesex County Building  
399 Ridout Street North  
London, ON N6A 2P1  
Tel: 519-434-7321 ext. 2283  
Fax: 519-434-0638  
E-mail: [wmeagher@middlesex.ca](mailto:wmeagher@middlesex.ca)

Legal Counsel for the Intervenor,  
Corporation of the County of Middlesex

**TO: ONTARIO ENERGY BOARD**

Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON N4P 1E4

Attention: Board Secretary                      Attention: Case Manager  
E-mail: [Boardsec@oeb.gov.on.ca](mailto:Boardsec@oeb.gov.on.ca)    E-mail: [Zora.Crnojacki@oeb.ca](mailto:Zora.Crnojacki@oeb.ca)  
Tel: 1-888-632-6273 (Toll free)  
Fax: 416-440-7656

**AND TO: ENBRIDGE GAS INC.**

500 Consumers Road  
Toronto, ON M2J 1P8

**Charles Keizer**

Torys LLP  
PO Box 270  
79 Wellington Street West  
Toronto Dominion Centre  
Toronto, ON M5K 1N2  
Email: [ckeizer@torys.com](mailto:ckeizer@torys.com)  
Tel: 416-865-0040  
Fax: 416-865-7380

**AND TO: ALL REGISTERED INTERVENORS**

via e-mail and posting on Board website

cc: client (Chris Traini) via e-mail

---

**ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** an application by Enbridge  
Gas Inc., for an order granting leave to construct natural  
gas pipeline and associated facilities.

---

**INTERROGATORIES OF THE INTERVENOR,  
THE CORPORATION OF THE  
COUNTY OF MIDDLESEX**

---

**THE CORPORATION OF THE  
COUNTY OF MIDDLESEX  
MIDDLESEX COUNTY BUILDING  
399 RIDOUT STREET NORTH  
LONDON, ON N6A 2P1**

**Wayne P. Meagher** (LSUC# 56418A)  
Middlesex County Barrister & Solicitor's Office  
Middlesex County Building  
399 Ridout Street North  
London, ON N6A 2P1  
Tel: 519-434-7321 ext. 2283  
Fax: 519-434-0638  
E-mail: [wmeagher@middlesex.ca](mailto:wmeagher@middlesex.ca)

Legal Counsel for the Intervenor,  
The Corporation of the County of Middlesex