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

VIA Email and RESS

ENBRIDGE

November 18, 2020

Ms. Christine Long Registrar Ontario Energy Board 2300 Yonge Street, Suite 2700 Toronto, Ontario, M4P 1E4

Dear Ms. Long:

Re: Enbridge Gas Inc. ("Enbridge Gas") Ontario Energy Board ("Board") File No.: EB-2019-0187 Saugeen First Nation Natural Gas Pipeline Project ("Project")

On February 6, 2020 the Board issued its Decision and Order for the above noted proceeding which included, as Schedule B, several Conditions of Approval.

Per Schedule B, Section 6. (a) in the aforementioned Decision and Order, Enbridge Gas is to provide the Board with a post construction report no later than three months after the in-service date. Please find enclosed a copy of the Post Construction report for the Saugeen First Nation Natural Gas Pipeline project.

Please contact me if you have any questions.

Yours truly,

Alison Evans **Advisor Regulatory Applications** Regulatory Applications & Strategy

EB-2019-0187: SAUGEEN FIRST NATION NATURAL GAS PIPELINE PROJECT POST CONSTRUCTION REPORT

Prepared By: Enbridge Gas Inc.

Environment November 2020

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1.0 <u>INTRODUCTION</u>

This Post Construction Report is provided pursuant to the Ontario Energy Board ("OEB" or "the Board") Decision and Order for the EB-2019-0187 proceeding. In that Decision and Order (dated February 6, 2020), the Board granted Enbridge Gas Inc. ("Enbridge Gas") leave, pursuant to subsection 90(1) of the *Ontario Energy Board Act*, 1998 (OEB Act) to construct approximately 16 kilometres of 2-inch diameter (NPS 2) pipeline to serve approximately 176 potential customers in the community of Saugeen First Nation in Bruce County ("the Project"). The project also included construction of a pressure regulating station.

The pipeline commenced at Enbridge's Port Elgin/Southampton high pressure system at the corner of Bruce Road 17 and B Line, where a distribution regulating station was installed. The pipeline was installed north along B Line to the Saugeen First Nation and travelled east and west along Highway 21 to serve the community. The pipeline was constructed within road allowances. Please see Appendix A of this report for a map of the entire pipeline route.

The requirements for and details of this Post Construction Report are outlined in the specific conditions issued by the OEB in its EB-2019-0187 Decision and Order as listed below. The complete Conditions of Approval ("COA") can be found in Appendix B of this report. The COAs addressed in this report are as follows:

Condition 1

Enbridge Gas Inc. (Enbridge Gas) shall construct the Project as described in the application using the NPS 2 design and restore the land in accordance with the OEB's Decision and Order in EB-2019-0187 and these Conditions of Approval.

Condition 3

Enbridge Gas shall implement all the recommendations of the Environmental Report filed in the proceeding, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.

Condition 4

Enbridge Gas shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Enbridge shall not make any such change without prior notice to and written approval of the OEB. In the event of an emergency, the OEB shall be informed immediately after the fact.

Condition 6

Both during and after construction, Enbridge Gas shall monitor the impacts of construction, and shall file with the OEB one paper copy and one electronic (searchable PDF) version of each of the following reports:

- a) a post construction report, within three months of the in-service date, which shall:
 - i. provide a certification, by a senior executive of the company, of Enbridge Gas' adherence to Condition 1;
 - ii. describe any impacts and outstanding concerns identified during construction;
- iii. describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction;
- iv. include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions; and
- v. provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licenses, and certificates required to construct, operate and maintain the proposed project.
- b) a final monitoring report, no later than fifteen months after the in-service date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:
 - i. provide a certification, by a senior executive of the company, of Enbridge Gas' adherence to Condition 3:
 - ii. describe the condition of any rehabilitated land;
- iii. describe the effectiveness of any actions taken to prevent or mitigate any identified impacts of construction;

- iv. include the results of analyses and monitoring programs and any recommendations arising therefrom; and
- v. include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received; a description of the complaint; any actions taken to address the complaint; and the rationale for taking such actions.

2.0 BACKGROUND

In May 2018, Union Gas Limited ("Union Gas") filed a combined leave to construct application for expansion into three communities: Chippewas of the Thames First Nation, Saugeen First Nation and North Bay. Union Gas was awarded funding to construct facilities in each of the three communities under the former Natural Gas Grant Program ("NGGP"). The OEB placed the application in abeyance in November 2018 after the NGGP was cancelled. In January 2019, Union Gas and Enbridge Gas Distribution Inc. amalgamated to become Enbridge Gas Inc.. In March 2019, Enbridge Gas was awarded funding to construct facilities in each of the three previously named communities under the new Access to Natural Gas Act, 2018 program. On July 31, 2019, Enbridge Gas withdrew the combined leave to construct application in favour of filing separate applications for each of the projects. On October 17, 2019, Enbridge Gas filed an application for a leave to construct under section 90 of the OEB Act to construct the Saugeen First Nation portion of the previously combined project. Enbridge Gas stated that First Nation officials, residents, and business owners in the Saugeen First Nation requested natural gas service from Enbridge Gas and potential natural gas customers of the Project relied on propane, fuel oil, wood and electricity to meet their energy needs. Compared to these fuels, natural gas is a less expensive and, in some cases, a lower carbon energy source. On February 6, 2020 the OEB granted Enbridge Gas leave to the construct the Project.

Construction was initiated on June 1, 2020 and was placed into service on August 24, 2020. Construction generally progressed with the following order of operations: flagging/staking, ploughing/horizontal directional drilling, tie-ins, back filling, and clean-up. Clean-up was completed concurrently to construction and was completed on October 23, 2020.

Enbridge Gas will return to the right-of-way in spring 2021 to perform a general overview to ensure the 2020 clean-up and restoration measures were successful and all disturbed areas in proximity to watercourse crossings are stable and re-vegetated. Any areas that require additional restoration measures will be addressed as required.

3.0 POTENTIAL IMPACTS AND MITIGATION

3.1 *Condition 1*

Enbridge Gas Inc. (Enbridge Gas) shall construct the Project as described in the application using the NPS 2 design and restore the land in accordance with the OEB's Decision and Order in EB-2019-0187 and these Conditions of Approval.

Enbridge Gas constructed the Project as described in the application using the NPS 2 design and restored the land in accordance with the OEB's Decision and Order in the EB-2019-0187 proceeding and the Conditions of Approval.

3.2 *Condition 3*

Enbridge Gas shall implement all the recommendations of the Environmental Report filed in the proceeding, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.

Enbridge Gas implemented all the recommendations of the Environmental Report filed in the proceeding and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review. Please refer to Table 1 to confirm Enbridge Gas' adherence to the recommendations and mitigation measures identified in the Environmental Report.

3.3 Condition 4

Enbridge Gas shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Enbridge shall not make any such change without prior notice to and written approval of the OEB. In the event of an emergency, the OEB shall be informed immediately after the fact.

The Project did not have any changes to OEB-approved construction or restoration procedures.

3.4 *Condition 6*

Both during and after construction, Enbridge Gas shall monitor the impacts of construction, and shall file with the OEB one paper copy and one electronic (searchable PDF) version of each of the following reports:

- a) a post construction report, within three months of the in-service date, which shall:
 - *i.* provide a certification, by a senior executive of the company, of Enbridge Gas' adherence to Condition 1;

One paper copy and one electronic (searchable PDF) version of this Post Construction Report are being filed with the Board. This report is certified by Michelle George, Vice President of Engineering & STO, that Enbridge Gas has constructed the facilities and restored the land in accordance with the OEB's Decision and Order in the EB-2019-0187 proceeding and the COAs. This is confirmed by the executive certification which can be found in Appendix C of this report.

- ii. describe any impacts and outstanding concerns identified during construction;
 - Table 1 of this report summarizes the general impacts and outstanding concerns identified during construction.
- iii. describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction;
 - Table 1 of this report summarizes the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction.
- iv. Include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received, a description of the complaint, any

actions taken to address the complaint, the rationale for taking such actions; and

Enbridge Gas' Complaint Tracking System (Table 2), which identifies the current status of complaints received as a result of pipeline construction, was in effect. A complaint is identified as a concern by a landowner that has not been resolved to their satisfaction within three (3) working days.

During construction, various concerns other than that listed in Table 2 were raised to Enbridge Gas and their Contractor. These issues were minor in nature and were dealt with by Enbridge Gas and the Contractor in an expeditious manner.

Enbridge Gas will continue to monitor the state of the land and will address any landowner or public concerns should they arise.

v. provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licenses, and certificates required to construct, operate and maintain the proposed project.

Michelle George, Vice President of Engineering & STO, has certified that the company has obtained all other approvals, permits, licences, and certificates required to construct, operate and maintain the project and is confirmed by the executive certification which can be found in Appendix C of this report.

Enbridge Gas obtained the following environmental permits for construction:

Saugeen Valley Conservation Authority

- Permit Conservation Authorities Act, R.S.O., 1990, Chap. C27 –
 Permit # 20-101
 - To install a gas line via open cut above a culvert within the Regulated Area and for related grading within the existing disturbed area of road allowance.

- Permit Conservation Authorities Act, R.S.O., 1990, Chap. C27 –
 Permit # 20-102
 - To install a gas line via horizontal directional drill under a wetland and watercourse within the Regulated Area and for related grading within the existing disturbed area of road allowance.
- Permit Conservation Authorities Act, R.S.O., 1990, Chap. C27 –
 Permit # 20-103
 - To install a gas line via open cut within the Regulated Area and for related grading within the existing disturbed area of road allowance.
- Permit Conservation Authorities Act, R.S.O., 1990, Chap. C27 –
 Permit # 20-104
 - To install a gas line via horizontal directional drill under watercourses within the Regulated Area and for related grading within the existing disturbed area of road allowance.

Grey Sauble Conservation Authority

- Permit Development, Interference with Wetlands, Alterations to Shorelines and Watercourses – Permit # GS20-078
 - Installation of a natural gas line and associated site alterations at Highway 21, Part Lot 51, Town of South Bruce Peninsula.

Ministry of Tourism, Culture and Sport

 Archaeology clearances under the MTCS File Numbers 0007247 and 0011668

Project Information Form Number	Stage	Location
P316-0375-2019	1-2	Pipeline Route
P316-0414-2019	1-2	Route Change on B Line
P316-0357-2018, P316- 0347-2017	1-2	Route Change on Highway 21
P316-0429-2020	1-2	Station Location

- b) a final monitoring report, no later than 15 months after the in-service date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:
 - i. provide a certification, by a senior executive of the company, of Union's adherence to Condition 3;
 - ii. describe the condition of any rehabilitated land;
 - iii. describe the effectiveness of any actions taken to prevent or mitigate any identified impacts of construction;
 - iv. include the results of analyses and monitoring programs and any recommendations arising therefrom; and
 - v. include a log of all complaints received by Union, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions.

One paper copy and one electronic (searchable PDF) version of the Final Monitoring Report will be filed with the Board no later than fifteen months after the in-service date.

4.0 **SUMMARY**

This Post Construction Report has been prepared pursuant to the Conditions of Approval contained in the OEB Decision and Order for the EB-2019-0187 proceeding. This report provides confirmation that Enbridge Gas has constructed the facilities and restored the land in accordance with the Board's Decision and Order and the COA, and obtained all approvals, permits, licenses,

and certificates required to construct, operate and maintain the Project. This report also provides a description of the identified impacts of construction and the actions taken to mitigate such impacts. Lastly, this report details all complaints received by Enbridge Gas and the actions taken to address such complaints.

It is anticipated that the actions taken by Enbridge Gas to mitigate identified impacts of construction will effectively eliminate long-term impacts to the environment.

Enbridge Gas will return to the right-of-way in spring 2021 and a Final Monitoring Report will be prepared to evaluate the success of the restoration measures and identify any areas that require additional restoration, if necessary.

Table 1 Potential Impacts and Mitigation Measures

Table 1: Potential Impacts and Mitigation Measures		
Issue	Potential Impact	Mitigation Measure
Paved/Gravel Driveways and Roadways	Disruption to local traffic, landowners and tenants	 All roadways and driveways were bored if practical. If it was not possible to bore driveways and roads, steel plates were on site to provide access to landowners and tenants. Enbridge Gas kept at least one lane of traffic open during construction and traffic controls were implemented as required. For driveways that required cutting, the excavation was filled with sand and granular material and compacted. Driveways were repaired as soon as possible.
Traffic	Disruption to local citizens	 At least one lane of traffic was maintained at all times. Flag persons and warning devices were used to notify traffic of construction in accordance with Ministry of Transportation standards.
Public Safety	Public safety concerns	 Enbridge Gas inspectors ensured public safety on the construction site. Proper signage and flag persons were used where required.
Commercial/Retail Businesses and Recreational Areas	Disruption to businesses	 Access to businesses was maintained at all times. The land around businesses and recreational areas was restored as soon as possible. Construction was scheduled with business owners or managers when necessary.
Construction Noise	Disturbance to local citizens	Construction was carried out during daylight hours whenever possible.Equipment was properly muffled.
Nuisance Dust	Disturbance to local citizens	- Dust was controlled as required.
Construction Equipment	Disturbance to local citizens	- Equipment was stored off road shoulders when not in use.
Landowner Concerns	Disruption to landowners	- Enbridge Gas provided Saugeen First Nation and the Municipality of Arran-Elderslie with the telephone numbers of supervisory personnel.

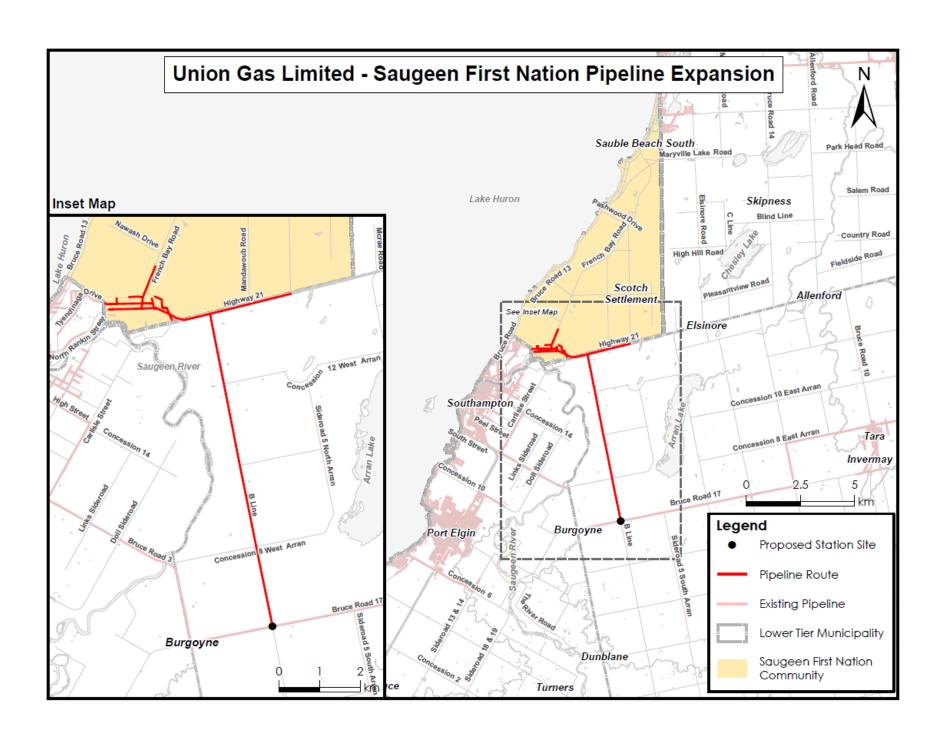
Table 1: Potential Impacts and Mitigation Measures		
Issue	Potential Impact	Mitigation Measure
	_	- An Enbridge Gas representative was onsite during construction to address any residents concerns as required.
Fences	Disruption to landowners Loss of control of animals inside fenced areas	 Landowners and tenants were contacted before any fences were disturbed. Temporary fencing was erected if requested by the landowner or tenant. Fences were replaced as soon as possible.
Front Yards	Disruption to landowners and tenants	 Landowners and tenants were notified prior to construction. Lawns and yards were restored to original condition.
Mailboxes	Disruption to landowners and tenants	 Landowners were notified of mailbox disruption when required. Mailboxes were restored as soon as possible and temporary alternatives were provided if necessary.
Underground Utilities	Disruption of services	 Locates were obtained from all utilities. Any damages to utilities were repaired as soon as possible.
Archaeology	Disturbance of heritage resources	 An Archaeological Assessment was completed prior to construction. No artifacts were encountered during construction.
Water Wells	Disruption to water supply	 A hydrogeological investigation was conducted prior to construction. No water well problems were reported during construction.
Trees	Damage to trees Disturbance to wildlife	- Tree removal was not required during construction.
Watercourse Crossings	Water quality concerns	 Enbridge Gas complied with permit conditions from the Saugeen Valley Conservation Authority and Grey Sauble Conservation Authority for all watercourse crossings. Enbridge Gas adhered to all company specifications and the Fisheries and Oceans Canada – endorsed Generic Sediment Control Plan for Horizontal

Table 1: Potential Impacts and Mitigation Measures		
Issue	Potential Impact	Mitigation Measure
		Directional Drill for watercourse crossings.
Natural Areas	Sedimentation run-off	- Sediment barriers (i.e. silt fencing and filter socks) were used in areas where there was potential for run-off.
Vegetative Cover	Loss of vegetative cover leading to soil erosion	- Cover was restored by seeding as soon as possible.
Soils: Erosion	Introduction of sediment/silt to adjacent lands	- Disturbed soils were restored as soon as possible after construction.
Roadside Ditches	Water quality concerns	 Ditches were returned to preconstruction condition as quickly as possible. Rock rip rap/straw bale check dams were installed as required.
Spills	Public safety issue	 No spills were identified during construction. Spill clean-up materials were stored onsite and were available in the event of a spill. If necessary, spills or leaks were to be reported to the appropriate authority immediately (Ministry of the Environment, Conservation and Parks Spills Action Centre at 1-800-268-6060).
Contaminated Soils	Dealing with contaminated materials Public safety issue	- No contaminated soils were identified during construction.
Cemeteries	Disturbance to unmarked grave sites and disruption to services	 Archaeological Assessments were conducted to prevent potential impacts to unmarked grave sites. No services took place at nearby cemeteries during construction.
Site Restoration	Disturbance to public and private properties	- The construction area was restored as soon as possible upon completion of pipe installation.

Table 2 Complaint Tracking System

Saugeen First Nation Natural Gas Pipeline Project: Summary of Landowner Complaints			
Date	Complaint	Resolution	Status
July 30, 2020	Cattle fencing was	The landowner contacted Enbridge Gas on	Resolved.
	removed/altered during pipeline	July 30, 2020 with the complaint. Enbridge	
	installation. His cattle escaped	Gas asked how the company could rectify the	
	due to the fencing being slack in	situation, and the landowner requested that the	
	that location and were found in his	excess footage fee for their proposed natural	
	crops in neighbouring fields.	gas service line be waived. This solution was	
		discussed with the project team on July 30,	
		2020 and it was determined to be an acceptable	
		solution. An Enbridge Gas representative made	
		arrangements to visit the landowner to verify	
		the length of the proposed service line to waive	
		the appropriate fee amount during the week of	
		August 3, 2020. The landowner was	
		unavailable during this week, so arrangements	
		were made to meet the following week of	
		August 10, 2020. An Enbridge Gas	
		representative met with the landowner and	
		confirmed that the excess footage fee would be	
		waived and agreed to fix the damaged fence	
		(the loose area was tightened by moving a	
		fence post). This issue has been resolved.	

Appendix A Project Mapping



Appendix B Conditions of Approval

SCHEDULE B – CONDITIONS OF APPROVAL Application under Section 90 of the OEB Act Enbridge Gas Inc. EB-2019-0187

- Enbridge Gas Inc. (Enbridge Gas) shall construct the Project as described in the application using the NPS 2 design and restore the land in accordance with the OEB's Decision and Order in EB-2019-0187 and these Conditions of Approval.
- (a) Authorization for leave to construct shall terminate 12 months after the decision is issued, unless construction has commenced prior to that date.
 - (b) Enbridge Gas shall give the OEB notice in writing:
 - of the commencement of construction, at least ten days prior to the date construction commences;
 - of the planned in-service date, at least ten days prior to the date the facilities go into service;
 - of the date on which construction was completed, no later than 10 days following the completion of construction; and
 - of the in-service date, no later than 10 days after the facilities go into service.
- Enbridge Gas shall implement all the recommendations of the Environmental Report filed in the proceeding, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.
- 4. Enbridge Gas shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Enbridge shall not make any such change without prior notice to and written approval of the OEB. In the event of an emergency, the OEB shall be informed immediately after the fact.
- 5. Enbridge Gas shall file, in the proceeding where the actual capital costs of the project are proposed to be included in rate base, a Post Construction Financial Report, which shall indicate the actual capital costs of the project and shall provide an explanation for any significant variances from the cost estimates filed in this proceeding, including contingency usage.
- Both during and after construction, Enbridge Gas shall monitor the impacts of construction, and shall file with the OEB one paper copy and one electronic (searchable PDF) version of each of the following reports:

- (a) A post construction report, within three months of the in-service date, which shall:
 - provide a certification, by a senior executive of the company, of Enbridge Gas' adherence to Condition 1;
 - describe any impacts and outstanding concerns identified during construction;
 - iii. describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction;
 - include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions; and
 - v. provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licenses, and certificates required to construct, operate and maintain the proposed project.
- (b) A final monitoring report, no later than fifteen months after the in-service date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:
 - provide a certification, by a senior executive of the company, of Enbridge Gas' adherence to Condition 3;
 - describe the condition of any rehabilitated land;
 - describe the effectiveness of any actions taken to prevent or mitigate any identified impacts of construction;
 - iv. include the results of analyses and monitoring programs and any recommendations arising therefrom; and
 - v. include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received; a description of the complaint; any actions taken to address the complaint; and the rationale for taking such actions.
- 7. Enbridge Gas shall designate one of its employees as project manager who will be responsible for the fulfillment of these conditions, and shall provide the employee's name and contact information to the OEB and to all the appropriate landowners, and shall clearly post the project manager's contact information in a prominent place at the construction site.

The OEB's designated representative for the purposes of these Conditions of Approval shall be the OEB's Manager of Natural Gas (or the Manager of any OEB successor department that oversees leave to construct applications).

Appendix C Executive Certification



Saugeen First Nation Community Expansion Project EB-2019-0187

I hereby certify Enbridge Gas Inc. has constructed the facilities and restored the land in accordance with the OEB's Decision and Order in Schedule B, EB-2019-0187, Section 6 (a).

	Michelle Digitally signed by Michelle George Date: 2020.11.1617:2538
Date	Senior Executive

Condition 6 (a)

- 6. Both during and after construction, Enbridge Gas shall monitor the impacts of construction, and shall file with the OEB one paper copy and one electronic (searchable PDF) version of each of the following reports:
- a) A post construction report, within three months of the in-service date, which shall:
 - Provide a certification, by a senior executive of the company, of Enbridge Gas' adherence to Condition 1;
 - ii. Describe any impacts and outstanding concerns identified during construction;
 - Describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction;
 - iv. Include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for such actions; and
 - v. Provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licenses, and certificates required to construct, operate, and maintain the proposed project.

Condition 1

Enbridge Gas Inc. (Enbridge Gas) shall construct the Project as described in the application using the NPS 2design and restore the land in accordance with the OEB's Decision and Order in EB-2019-0187 and these Conditions of Approval.

Appendix D Photograph Inventory



1. Prior to installing the pipeline, the running line is flagged and staked and locates are obtained.



2. Where practical, the pipeline is installed in the gravel/grass interface of the road allowance which minimizes impacts on the environment.



3. Filter socks are installed in sensitive areas (i.e. in proximity to watercourses) as a sediment and erosion control measure.



4. Horizontal directional drilling is utilized to install the pipeline which greatly reduces ground disturbance and potential environmental impacts.



5. Proper signage and safety measures are implemented while working on roadways and one lane of traffic is maintained at all times.



6. Temporary fencing is installed around open excavations as a public safety measure.