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



VIA Email and RESS

January 20, 2021

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-2018-0013

Chatham-Kent Rural Project ("Project")

On July 11, 2019 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. and 7. (b) in the aforementioned Decision and Order, Enbridge Gas is to provide the Board with a Post Construction Financial report concurrent with the 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. Please find enclosed a copy of the Post Construction Financial and Final Monitoring reports for the Chatham-Kent Rural project.

Please contact me if you have any questions.

Yours truly,

Alison Evans Advisor Regulatory Applications Regulatory Applications & Strategy

CHATHAM-KENT RURAL PROJECT FINAL MONITORING REPORT EB-2018-0188

Prepared by: Enbridge Gas Inc.
Environmental Planning

January 2021

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Chatham-Kent Rural Project Final Monitoring Report

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1.0 INTRODUCTION

This Final Monitoring Report is provided pursuant to the Ontario Energy Board ("Board") Decision and Order for the EB-2018-0188 proceeding. The Decision and Order granted Enbridge Gas Inc. ("Enbridge Gas") leave to construct the Chatham-Kent Rural Project (the "Project"). The Project is composed of two high-pressure pipelines in a portion of Enbridge Gas' Transmission System serving Southwestern Ontario: a 500 metre NPS 12-inch pipeline (Bear Line Section) and a 13.0-kilometre NPS 8-inch pipeline (Base Line Section) which will reinforce the Chatham Transmission System.

The Bear Line Section consisting of 500 metres of the NPS 12-inch pipeline, extended from the Dover Centre Transmission Station located on Bear Line in Dover Township to the Dover Centre Take-Off at the corner of Bear Line and Dover Centre Line within the Municipality of Chatham-Kent. A map of the pipeline route is included in Appendix A.

The Base Line section consisting of 13 kilometers of the NPS 8-inch pipeline commenced from Enbridge Gas' existing Simpson Road Station (near the community of Tupperville) to an endpoint west of the intersection of Base Line and Kent Bridge Road east of the Town of Dresden also within the Municipality of Chatham-Kent. A map of the pipeline route is included in Appendix A.

The OEB's Decision and Order for the Project specified several conditions of approval ("COA"). The COAs can be found in Appendix B of this report. The specific COAs addressed in this report are as follows.

- 1.0 Enbridge Gas Inc. (Enbridge Gas) shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in EB-2018-0188 and these Conditions of Approval.
- 3.0 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.

- 5.0 Enbridge Gas shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Enbridge Gas 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.
- 7.0 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. described any impact or 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 rational 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, licences 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, 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 and identified impacts of construction.
 - iv. include the results of any 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, the rational for taking such actions.

2.0 BACKGROUND

Enbridge Gas was granted leave to construct the Chatham-Kent Rural Project on July 11, 2019. Construction began on the Bear Line section on July 22, 2019 with the pipeline placed into service on August 29, 2019 and cleanup for the year completed on October 22, 2019. Construction of the Base Line section was initiated on July 25, 2019, with the pipeline placed into service on November 22, 2019 and cleanup for the year completed on December 20, 2019.

Enbridge Gas returned to the right-of-way in the spring of 2020 to complete the following activities: repair subsidence on the right-of-way, perform a general overview of the right-of-way and complete any additional clean-up that is required.

3.0 POTENTIAL IMPACTS AND MITIGATION

3.1 Condition 1.0

Enbridge Gas Inc. (Enbridge Gas) shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in EB-2018-0188 and these Conditions of Approval.

Enbridge Gas has complied with all conditions imposed by the Board's Decision and Order in EB-2018-0188 and the COAs associated with that Decision and Order during construction of the Project. Enbridge Gas has restored the land according to the evidence provided in support of its application.

3.2 Condition 3.0

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 has implemented all recommendations and mitigation measures outlined in the Environmental Report (ER) filed in the proceeding, along with all directives identified by the Ontario Pipeline Coordinating Committee (OPCC) review. Table 1 summarizes the construction effects and general mitigation measures carried out during construction. All mitigation techniques used throughout construction were also implemented during cleanup activities as required.

3.3 **Condition 5.0**

Enbridge Gas shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Enbridge Gas 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.

There was one "Request to Vary" issued during the project which included:

In a letter dated August 9, 2019 sent to the OEB, Enbridge Gas requested to use a lower grade pipe to construct a 90-metre section of NPS 12. Specifically, this 90-metre section of pipe has a lower Pipe Grade (minimum 359 MPa) than the Pipe Grade (minimum 386 MPa) as filed at Schedule 15 page 2 of 2 in the pre-filed evidence for the Project. The OEB responded in a letter dated August 15, 2019 authorizing the change.

Copies of the letters sent to the Ontario Energy Board informing them of the changes and letters of response from the OEB can be found in Appendix C.

3.4 Condition 7.0

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) 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's adherence to Condition 1;

- ii. described any impact or outstanding concerns identified during construction
- iii. describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of the 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 rational 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, licences and certificates required to construct, operate and maintain the proposed project.

The previously filed Post Monitoring Report included the required certifications from a senior executive, described the construction effects and general mitigation measures employed during construction and provided a description of the successfully completed monitoring programs initiated both prior to and during construction.

- 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, following June 1, which shall:
 - i. provide a certification, by a senior executive of the company, of Enbridge Gas' adherence to Condition 3;

One electronic (searchable PDF) version of this Final Monitoring Report has been filed with the OEB. Enbridge Gas has implemented all the recommendations of the Environmental Report filed in the proceeding, and all the recommendations and directives identified by the OPCC review. Executive certification can be found in Appendix C of this report.

ii. describe the condition of any rehabilitated land;

Most of the pipeline right-of-way was within the road allowance with a large section of the pipe installed using the horizontal directional drill method including the watercourses, which allowed much of the pipeline corridor to be undisturbed.

Those areas that were disturbed have been successfully revegetated. All watercourse crossings are stable and vegetated. No deficiencies in compliance have been identified.

- iii. describe the effectiveness of any actions taken to prevent or mitigate and identified impacts of construction.
- iv. include the results of any analyses and monitoring programs and any recommendations arising therefrom; and

3.4.1 Monitoring Programs

3.4.1.1 Soybean Cyst Nematodes

Prior to construction, all impacted agricultural fields were sampled for Soybean Cyst Nematodes ("SCN") with negative results. No additional mitigation measures were required.

3.4.1.2 <u>Archaeological Assessment</u>

Enbridge Gas retained the services of Stantec Consulting Ltd. to conduct a Stage 1 and Stage 2 archaeological assessment along both the Bear Line and Base Line pipeline sections. Although the Bear Line assessment required no additional surveys, the Base Line assessment identified an area that required an additional Stage 3 assessment. Upon completion of the Stage 3 there were no further archaeological assessments recommended.

3.4.1.3 <u>Watercourse Monitoring</u>

During construction of the Base Line section, it was necessary to cross seven (7) watercourses regulated by the St. Clair Region Conservation Authority (SCRCA) using the horizontal directional drill (HDD) method. All crossings were completed under permits acquired from the SCRCA. There were no permits required from the Lower Thames Valley Conservation Authority for the Bear Line section.

Watercourses were protected prior to, during and following construction by installing sediment fencing and erosion control matting where necessary. Disturbed areas adjacent to the watercourses were seeded immediately following the installation of the pipeline.

Watercourses that were susceptible to erosion were checked after excessive rainfall to verify the effectiveness of the sediment control devices. All watercourses affected during construction remained undisturbed during the directional drill crossing.

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, the rational for taking such actions.

To date no complaints have been received by Enbridge Gas for the Project. Enbridge Gas will continue to monitor the state of the land and environment and will address any concerns, if they should arise.

4.0 **SUMMARY**

This Final Monitoring Report has been prepared pursuant to the COAs contained in the Board's Decision and Order for the EB-2018-0188 proceeding. The report in conjunction with the previously filed Post Construction Report provides confirmation that Enbridge Gas has implemented all the recommendations of the Environmental Report filed in the proceeding and all recommendations and directives identified by the Ontario Pipeline Coordinating Committee review. This report also confirms that Enbridge Gas successfully rehabilitated the land disturbed from construction with no outstanding concerns. It is anticipated that these mitigation measures and rehabilitation efforts will effectively eliminate any long-term impacts to the environment.

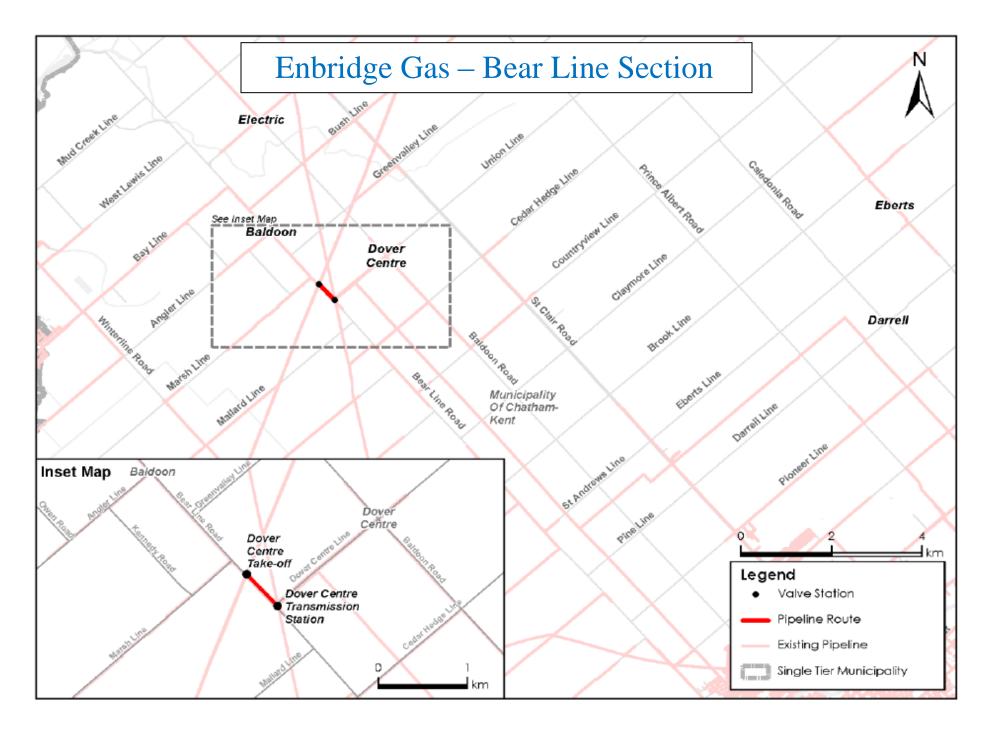
"Table 1"

Potential Impacts and Mitigation Measures

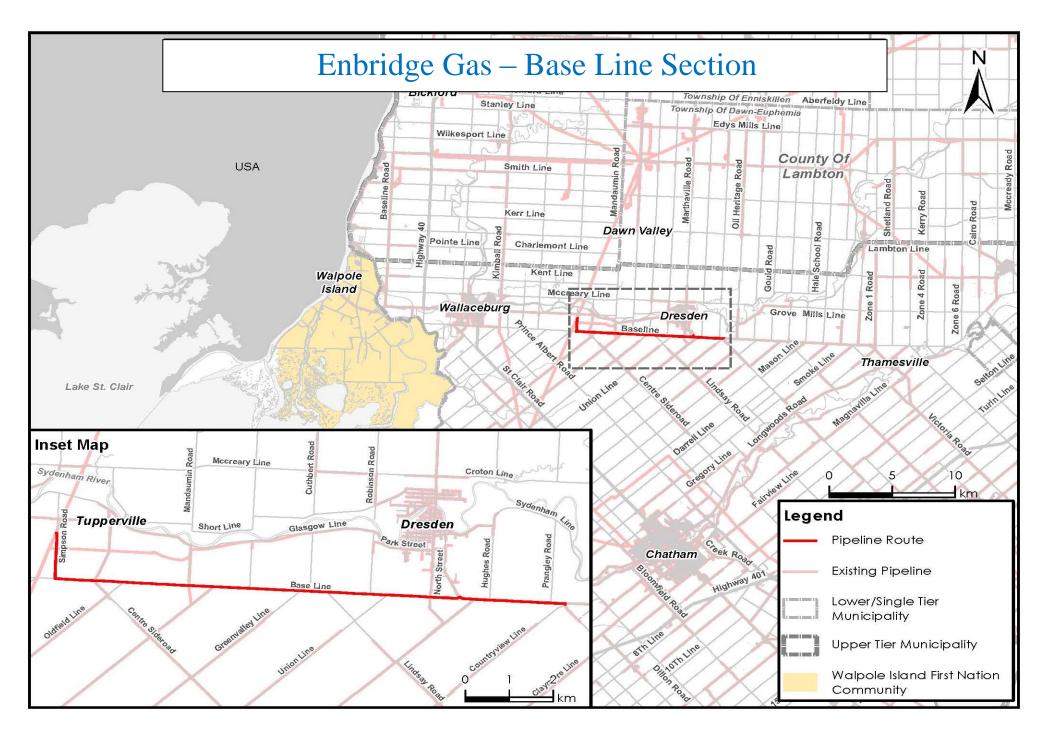
TABLE 1: MITIGATION SUMMARY									
Issue	Potential Impact	Proposed Mitigation							
a) Archaeology	Disturbance to cultural heritage resources.	• Prior to any activities associated with the project, a Stage 1 & 2 assessment was undertaken and identified the necessity for a Stage 3 assessment. Following the Stage 3 no other assessments were required and no artifacts were found during construction.							
b) Species At Risk (SAR)	Encountering SAR	Followed recommendations as outlined in the conditions imposed in the "Letter of Proponent" issued by the Ministry of Natural Resources and Forestry.							
c) Soybean Cyst Nematodes (SCN)	Spread of SCN to non impacted agricultural lands.	All agricultural fields affected during construction were tested for SCN with negative results. No further mitigation was required.							
d) Complaint Tracking	Disruption to public	 Enbridge Gas provided the affected landowners with the telephone numbers of Company personnel. To date there have been no complaints entered into the complaint tracking system. 							
e) Watercourses	Water quality concerns	 Enbridge Gas adhered to Company specifications for watercourse crossings. Enbridge Gas obtained permits from the St. Clair Region Conservation Authority for all watercourse crossings. 							
f) Roadways	Disruption to local citizens and businesses	 At least one lane of traffic was always maintained. Flag persons and warning devices were used to notify traffic of the construction zone. 							
g) Public Safety	Public safety concerns	 Company inspectors ensured public safety on construction site. Ensured proper signage and flag persons if required. 							
h) Construction Equipment	Disruption to landowners and tenants	Equipment was stored well off the shoulder of the road when not in use.							
i) Construction Noise	Disturbance to landowners and tenants	 Construction was carried out during daylight hours whenever possible. Ensured equipment was properly muffled. 							
j) Fuel Storage and Handling	Improper fuel storage and handling may cause spillage and possible contamination of soil	 Fuel was not stored near watercourses (i.e. Within 50 metres) Spill clean-up materials were stored on site and available in the event of a spill. Spills or leakage were to be reported to the appropriate authority immediately (Ministry of the Environment, Conservation and Parks Spills Action Centre at 1-800-268-6060) No reportable spills were recorded during construction 							

Appendix A Location Map

GENERAL LOCATION MAP CHATHAM-KENT RURAL PROJECT



GENERAL LOCATION MAP CHATHAM-KENT RURAL PROJECT



Appendix BConditions of Approval

SCHEDULE B – CONDITIONS OF APPROVAL

Application under Section 90 of the OEB Act Enbridge Gas Inc.

EB-2018-0188

- Enbridge Gas Inc. (Enbridge Gas) shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in EB-2018-0188 and these Conditions of Approval.
- (a) Authorization for leave to construct shall terminate 18 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;
 - ii. of the planned in-service date, at least ten days prior to the date the facilities go into service;
 - iii. of the date on which construction was completed, no later than 10 days following the completion of construction; and
 - iv. 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.
- Authorization for leave to construct is granted conditional on Enbridge Gas filing with the OEB a clearance letter from the Ministry of Tourism, Culture and Sport for the project.
- Enbridge Gas shall advise the OEB of any proposed change to OEBapproved construction or restoration procedures. Except in an emergency, Enbridge Gas 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.

- 6. Concurrent with the final monitoring report referred to in Condition 7(b), Enbridge Gas shall file a Post Construction Financial Report, which shall provide a variance analysis of project cost, schedule and scope compared to the estimates filed in this proceeding, including the extent to which the project contingency was utilized. Enbridge Gas shall also file a copy of the Post Construction Financial Report in the proceeding where the actual capital costs of the project are proposed to be included in rate base or any proceeding where Enbridge Gas proposes to start collecting revenues associated with the project, whichever is earlier.
- 7. 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:
 - 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, licences, and certificates required to construct, operate and maintain the proposed project.
 - 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;
 - 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, the rationale for taking such actions.
- 8. 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 purpose of these Conditions of Approval shall be the OEB's Manager of Supply and Infrastructure (or the Manager of any OEB successor department that oversees leave to construct applications).

Appendix C Letters to the OEB – Request to Vary

August 9, 2019

VIA EMAIL and COURIER

ÉNBRIDGE

Ms. Kirsten Walli Ontario Energy Board 2300 Yonge Street, 27th Floor Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: Enbridge Gas Inc. ("Enbridge Gas")

Ontario Energy Board File: EB-2018-0188

<u>Chatham-Kent Rural Project – Request to Vary</u>

Please find attached a Request to Vary Form (Attachment 1) as submitted by Enbridge Gas Inc. ("Enbridge Gas") for the Chatham-Kent Rural Pipeline Project ("the Project"). As detailed in Attachment 1, the rationale for this request is that a 90-metre section of NPS 12 pipe that Enbridge Gas intends to use to construct the Project has a lower Pipe Grade (minimum 359 MPa) than the Pipe Grade (minimum 386 MPa) as filed at Schedule 15 p. 2 of 2 of the pre-filed evidence (see Attachment 2).

As confirmed in the attached correspondence from the Technical Standards and Safety Authority ("TSSA") (Attachment 3), not only does the lower grade pipe comply with all necessary code requirements, the TSSA identified no issue or concern with the use of this pipe for the Project. For this reason, Enbridge Gas respectfully requests a timely review and approval of this request.

Should you have any questions concerning this request please contact me at (416) 495-5676.

Yours truly,

[Original Signed by]

Joel Denomy, M.A. CFA Technical Manager, Regulatory Applications

c.c.: N. Marconi (OEB Staff)

A. Manzano (OEB Staff)

I. Mondrow (IGUA)

D. Richarson, L. DeMarco, J. McGillivray, L. Sault (Anwaatin Inc.)

REQUEST TO VARY

Project Name:

Chatham-Kent Rural Pipeline Project

OEB File Number:

EB-2018-0188

Change Request:

1

Description and Rationale for Change

Enbridge Gas is requesting to use a lower grade pipe to construct a 90-metre section of NPS 12. Specifically, this 90-metre section of pipe has a lower Pipe Grade (minimum 359 MPa) than the Pipe Grade (minimum 386 MPa) as filed at Schedule 15 page 2 of 2 in the pre-filed evidence for the Project. The Technical Standards and Safety Authority ("TSSA") has indicated that the lower Pipe Grade complies with all necessary code requirements and has no issue with the use of this pipe for the Project.

Construction and Restoration Practices

No impact to construction and/or restoration practices

Environmental

No impact to the environment

Consultation

Consulted with the Technical Standards and Safety Authority ("TSSA") to ensure Change Request complies with all necessary Code requirements

Lands

No impact to lands

Costs

No material impact to costs

Schedule

No impact to the in-service date

Attachments

Attachment 1 – Request to Vary Form

Attachment 2 – Updated pipe specifications showing the lower Pipe Grade (minimum 359 MPa) for the 90-metre section of NPS 12 pipe as provided to the TSSA (note: pipe used for the NPS 8 portion of the Project did not change)

Attachment 3 - Correspondence between Enbridge Gas and TSSA

DESIGN AND PIPE SPECIFICATIONS- NPS 12 SECTION

Design Specifications:

Design Class Location - Class 3
Design Factor - 0.8
Location Factor (Road) - 0.625
Location Factor (General) - 0.700
Joint Factor - 1.00

Design Temperature - M5C (below-grade)

M30C (above-grade)

Design Pressure - 6895 kPa
Test Medium - Water
Minimum Test Pressure - 9653 kPa

Minimum Valve/Flange Rating - PN

100

Minimum Depth of Cover (General) - 0.6 m Minimum Depth of Cover (Road) - 1.2 m

Pipe Specifications:

Size - NPS 12 Outside Diameter - 323.9 mm

Wall Thickness - Minimum 7.1 mm

Grade - Minimum 359 MPa

Type - Electric Resistance Weld

Description - C.S.A. Standard Z245.1

Category - Cat. I, M5C Coating - FBE or YJ

% SMYS - 43.8% - Based on the above minimums

Chris Gagner

From:

Kourosh Manouchehri < KManouchehri@tssa.org>

Sent:

August-07-19 1:22 PM

To:

Azhar Ahmed

Cc:

Robert Pieta; Norm Dumouchelle; Doug Schmidt; Chris Gagner; Zora Crnojacki

Subject:

[External] RE: CK Rural Project- NPS 12 Pipe Change

Attachments:

RE: CK Rural Project- NPS 12 Pipe Change

EXTERNAL: PLEASE PROCEED WITH CAUTION.

This e-mail has originated from outside of the organization. Do not respond, click on links or open attachments unless you recognize the sender or know the content is safe.

Hi Azhar,

My letter dated June 27, 2019 to OEB still is valid. There is no need for another letter. Change of material grade is accepted through my email dated July 25th and this email. As the pipe's manufacture is not Hyundai, I don't have any more comments.

Regards,

Kourosh Manouchehri, P.Eng., PMP | Engineer



Fuels Safety
345 Carlingview Drive
Toronto, Ontario M9W 6N9
Tol: 1,416,734,3539 L Fax: +1,416,2

Tel: +1-416-734-3539 | Fax: +1-416-231-7525 | E-Mail: kmanouchehri@tssa.org

www.tssa.org

From: Azhar Ahmed <AAAhmed@uniongas.com>

Sent: August 7, 2019 09:42

To: Kourosh Manouchehri < KManouchehri@tssa.org>

Cc: Robert Pieta <RPieta@uniongas.com>; Norm Dumouchelle <NPDumouchelle@uniongas.com>; Doug Schmidt

<DSchmidt@uniongas.com>; Chris Gagner <CGagner@uniongas.com>

Subject: RE: CK Rural Project- NPS 12 Pipe Change

Hi Kourosh. The pipe came from Evraz in Red Deer. We will be approaching OEB after you have given your okay. Would we need a letter from you approving the updated pipe specs when we reach out to OEB?

Pipeline Engineer

ENBRIDGE GAS, INC

TEL: 519-436-4600 ext. 5002171 | CELL: 519-784-1674 50 Keil Drive North, Chatham, ON N7M 5M1

enbridge.com

Integrity. Safety. Respect.

From: Kourosh Manouchehri [mailto:KManouchehri@tssa.org]

Sent: July-25-19 10:14 AM

To: Azhar Ahmed

Cc: Robert Pieta; Norm Dumouchelle; Doug Schmidt; Chris Gagner **Subject:** [External] RE: CK Rural Project- NPS 12 Pipe Change

EXTERNAL: PLEASE PROCEED WITH CAUTION.

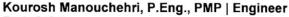
This e-mail has originated from outside of the organization. Do not respond, click on links or open attachments unless you recognize the sender or know the content is safe.

Hi Ahamed.

I reviewed the updated piping spec. As I see on the revised spec, only grade of the NPS 12 is changed which resulted to 43.8% SMYS stress vs 40.3%. This value is still relatively low for transmission lines. I have no comments on the change and updated our record accordingly. Could you please provide the name of selected pipe manufacture? As you probably know there are issues with one pipe manufacture and NEB issued ordered on that. I sent an email to my contact in Enbridge but did not get the response yet, attached email.

Please update me on the construction schedule when it is available.

Regards,





Fuels Safety 345 Carlingview Drive Toronto, Ontario M9W 6N9

Tel: +1-416-734-3539 | | Fax: +1-416-231-7525 | E-Mail: <u>kmanouchehri@tssa.org</u> www.tssa.org

RIBO

From: Azhar Ahmed < AAAhmed@uniongas.com>

Sent: July 25, 2019 09:30

To: Kourosh Manouchehri < KManouchehri@tssa.org>

Cc: Robert Pieta < RPieta@uniongas.com >; Norm Dumouchelle < NPDumouchelle@uniongas.com >; Doug Schmidt

<DSchmidt@uniongas.com>; Chris Gagner <CGagner@uniongas.com>

Subject: RE: CK Rural Project- NPS 12 Pipe Change

Hi Kourosh. I just wanted to follow up to see if you had any questions or concerns with regards to the updated pipe specification.

Pipeline Engineer

ENBRIDGE GAS, INC

TEL: 519-436-4600 ext 5002171 | CELL: 519-784-1674 50 Keil Drive North, Chatham, ON N7M 5M1

enbridge.com

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From: Azhar Ahmed Sent: July-17-19 11:51 AM To: 'KManouchehri@tssa.org' **Cc:** Robert Pieta; Norm Dumouchelle; Doug Schmidt **Subject:** CK Rural Project- NPS 12 Pipe Change

Hi Kourosh. As discussed, attached is the updated pipe specification for the NPS 12 Chatham Kent Project. The NPS 8 part of this project is unchanged. Please let me know if you have any questions.

Pipeline Engineer

ENBRIDGE GAS, INC
TEL: 519-436-4600 ext. 5002171 | CELL: 519-784-1674
50 Keil Drive North, Chatham, ON N7M 5M1

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Ontario Energy Board P.O. Box 2319 27th Floor 2300 Yonge Street Toronto ON M4P 1E4 Telephone: 416-481-196

Telephone: 416-481-1967 Facsimile: 416-440-7656 Toll free: 1-888-632-6273 Commission de l'énergie de l'Ontario

C.P. 2319 27º étage 2300, rue Yonge Toronto ON M4P 1E4 Téléphone: 416-481-1967 Télécopieur: 416-440-7656

Numéro sans frais: 1-888-632-6273



BY E-MAIL

August 15, 2019

To: All Parties, EB-2018-0188

Re: Chatham-Kent Rural Project (Project)

Board File Number: EB-2018-0188

Request to Vary for July 11, 2019 Decision and Order

The Ontario Energy Board (OEB) is in receipt of your letter dated August 9, 2019, in which Enbridge Gas Inc. (Enbridge Gas) requests approval from the OEB for a change to the Chatham-Kent Rural Pipeline Project (Change Request No. 1).

Enbridge Gas proposes to use a lower Pipe Grade (minimum 359 MPa) to construct a 90-metre section of NPS 12 pipe for the Project, rather than the Pipe Grade (minimum 386 MPa) as originally filed at Schedule 15, page 2 of 2 of its pre-filed evidence.

Enbridge Gas notes that the Technical Standards and Safety Authority has indicated that the lower grade pipe complies with all necessary code requirements, and has identified no issue or concern with the use of this pipe for the Project. The in-service date for the pipeline remains unchanged and Enbridge Gas notes that there are no impacts to the environment, land, or Construction and Restoration Practices. Enbridge Gas states that there are no material cost impacts.

As the Manager, Applications Supply and Infrastructure, I have been delegated, under section 6 of the *Ontario Energy Board Act, 1998*, the authority of the OEB to determine whether Enbridge Gas' proposal will result in material changes to the natural gas pipeline in respect of which leave to construct was granted by the OEB in the EB-2018-0188 proceeding. I have been further granted the authority to approve any changes that I have concluded are not material.

Based on my review of the information provided in Change Request No.1, I find that the change in Pipe Grade for the 90-metre section of NPS 12 pipeline proposed by Enbridge Gas is not material. I hereby approve the proposed change.

Yours truly,

Original signed by

Nancy Marconi Manager, Applications Supply and Infrastructure

Appendix D Executive Certification

2019 Chatham-Kent Rural Project EB-2018-0188 Decision and Order July 11, 2019

I hereby certify Enbridge Gas Inc. has constructed the facilities and restored the land in accordance with the OEB's Decision and Order, EB-2018-0188, Schedule B, Condition 7. b).

Date	Michelle George Vice President, Engineering & STO
	Enbridge Gas Inc.

Condition 7.

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:

- 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, the rationale for taking such actions.

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.

POST CONSTRUCTION FINANCIAL REPORT

2019 Chatham-Kent Rural Project

In compliance with the Ontario Energy Board Order EB-2018-0188 and Condition 6, the following is a report on the capital pipeline and station cost for the 2019 Chatham-Kent Rural Project.

The Project actual cost was \$14,797,615, or 23% lower than estimated. The following explains any significant variances.

	Baseline Estimate		Actual Costs		Variance		Variance
	\$		\$		\$		%
Materials (1)	\$	2,098,968	\$	2,418,194	\$	319,226	15%
Construction and Labour (2)	\$	14,339,292	\$	12,285,258	\$	(2,054,034)	-14%
Contingency (3)	\$	2,492,037	\$	-	\$	(2,492,037)	-100%
Interest During Construction (4)	\$	169,703	\$	94,163	\$	(75,540)	-45%
Total Project Capital Costs	\$	19,100,000	\$	14,797,615	\$	(4,302,385)	-23%

- (1) Actual cost for Material and Equipment for the Project were higher than original estimates which were based upon historical average unit cost.
- (2) Actual cost for Prime Contractor, Miscellaneous Outside Services, and Land were all lower than the original estimate. Key reasons for being under budget include: high installation productivity due to excellent weld production rates and the use of a pipe trenching machine to install the NPS 8 portion of the pipeline, NDE contractor time on site was optimized, and limited inclement weather impact.
- (3) Contingency for the project was not used because other forecast costs came in lower than estimated.
- (4) Interest During Construction actuals are shown separately. These costs were not separated during the OEB application.