

January 22, 2021

**VIA EMAIL and RESS**

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

Dear Ms. Long:

**Re: Enbridge Gas Inc. (Enbridge Gas)  
Ontario Energy Board (OEB) File No: EB-2020-0065  
NPS 26 Branchton Relocation Project (Project)**

---

In accordance with section 24 of the OEB's *Rules of Practice and Procedure* (Rules) Enbridge Gas hereby requests a two month adjournment of its application for the Project (Application). The Rules require that a party make a motion to adjourn. This letter serves as the motion of Enbridge Gas for that purpose and sets out its submissions in support of the request.

***Grounds for Adjournment Request***

Since filing the Application on November 9, 2020, there has been a change in the class location requirements in the Canadian Standards Association (CSA) Z662-15 (Oil and Gas Pipeline Systems) upon which the Application was based. On December 8, 2020, the Technical Standards and Safety Authority published an Oil and Gas Pipeline Systems Code Adoption Document Amendment (Amendment) that, amongst other things, adopts and requires all persons to whom *O. Reg. 210/01* (Oil and Gas Pipeline Systems) applies to comply with CSA Z662-19 (Oil and Gas Pipeline Systems) in place of CSA Z662-15.<sup>1</sup> The Amendment is effective February 8, 2021.

Enbridge Gas has conducted a preliminary assessment of the effects of the Amendment on the Project and concluded that with the current state of development in the Project area, a smaller portion of pipeline than contemplated in the Application is non-compliant with the new class location requirements. Further consideration is required to determine how this change impacts the Application and the pre-filed evidence and what updates would be required.

As Enbridge Gas has noted in the evidence, there are public interest benefits associated with the Project in addition to meeting the class location requirements, such as accommodating future development and road work in the Project area. If planned development in the Project area proceeds, class location concerns will likely arise again in the near future. Enbridge Gas wishes to re-assess the timing of these factors and determine how its Application should be amended or deferred.

---

<sup>1</sup> <https://www.tssa.org/en/fuels/resources/Pipelines-CAD-Dec-8-2020.pdf>

### ***Proposed Conditions to Adjournment***

As conditions of the adjournment, if granted, Enbridge Gas proposes the following:

- 1) to file an updated Application and evidence on or before March 26, 2021 or to withdraw the Application as filed; and
- 2) to continue to work with stakeholders impacted by the Project to determine an appropriate path forward to meet stakeholder needs.

Given the uncertainty of how the Application may be impacted, Enbridge Gas does not propose to answer interrogatories at this time. Rather, Enbridge Gas will await the Board's consideration of this adjournment request and further directions.

Yours truly,

Tania Persad  
Senior Legal Counsel

cc: EB-2020-0065 Intervenor