



BY E-MAIL

April 12, 2021

Mr. Rakesh Torul
Technical Manager, Regulatory Applications
Enbridge Gas Inc.
500 Consumers Road
Toronto, ON M2J 1P8
EGIRegulatoryProceedings@enbridge.com

Dear Mr. Torul:

**Re: Enbridge Gas Inc.
London Lines Replacement Project
Ontario Energy Board File Number EB-2020-0192
Change Request No. 1**

On March 12, 2021, Enbridge Gas Inc. (Enbridge Gas) submitted a letter to the Ontario Energy Board (OEB) requesting approval of changes to the London Lines Replacement Project (Project) including: additional temporary land use rights (TLU), additional permanent easements, additional land purchases, and reduction in size to certain TLU areas (Change Request No.1). Enbridge Gas updated the supporting documentation on March 31, 2021 and responded to OEB staff questions on April 1, 2021 and April 9, 2021.

The Change Request No. 1 is made pursuant to Condition of Approval No. 7 of the OEB's [Leave to Construct Decision and Order](#) granted for the Project on January 28th, 2021¹. Condition of Approval No. 7 provides the following:

7. Enbridge Gas shall advise the OEB of any proposed change in the project, including but not limited to changes in: OEB-approved construction or restoration procedures, the proposed route, construction schedule and cost, the necessary environmental assessments and approvals, and all other approvals, permits, licences, certificates and rights required to construct the proposed facilities. Except in an emergency, Enbridge Gas shall not make any such change without

¹ EB-2020-0192
2300 Yonge Street, 27th floor, P.O. Box 2319, Toronto, ON, M4P 1E4
2300, rue Yonge, 27^e étage, C.P. 2319, Toronto (Ontario) M4P 1E4

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 consists of approximately 90 km of various diameter natural gas transmission pipeline, located in the County of Lambton, the Township of Dawn-Euphemia, Middlesex Country, the Municipality of Southwest Middlesex, the Municipality of Strathroy-Caradoc, and the Municipality of Middlesex Centre. The OEB approval included the Project route (OEB-approved Route). The Change Request No. 1 affects 46 properties along the OEB-approved Route.

Enbridge Gas indicates that additional TLU rights are required to allow for modified construction methods, to provide the crews with a workspace to house equipment, store materials and work safely in areas where there is insufficient room in the road allowance to complete the trenchless installation method.

Enbridge Gas states that the proposed changes will not impact the Project's construction or restoration methods as originally described in the General Techniques and Methods of Construction at Exhibit D, Tab 1, Schedule 1 of the pre-filed evidence for the Project. According to Enbridge Gas, it plans to switch construction methods from Open Cut/Trench to Horizontal Directional Drilling/Bore, both of which were described in the pre-filed evidence for the Project.

Enbridge Gas states that additional land purchases are required for bigger stations. Enbridge Gas however indicates that some TLU areas have been reduced in size as it continues with the detailed design and looks for opportunities to minimize the impact to the environment.

Enbridge Gas indicates that additional land surveys determined that additional permanent easements are required to install the small sections of the pipeline outside of road allowance due to street line inconsistencies.

Enbridge Gas confirms that the adjustments to the alignment of the pipeline are within the OEB-approved Route. Enbridge Gas does not indicate any potential environmental impacts caused by the proposed changes except that an archaeological assessment will be completed on sites that were not included in the original filings.

According to Enbridge Gas, consultation with affected landowners is on-going and all landowners affected by the Change Request No. 1 have been or will be offered the agreements in the form approved by the OEB in the EB-2020-0192 proceeding, and will have signed agreements in place prior to construction on the properties.

Enbridge Gas states that the additional costs of acquiring additional TLU, permanent easements and land purchases will have no material impact on the overall Project costs. Enbridge Gas also confirms, in response to OEB staff questions, that the additional costs associated with the proposed changes are within the contingency budget for the Project.

The Change Request No. 1, according to Enbridge Gas, will have no impact on the in-service date of the Project.

As the Manager, Natural Gas Applications, I have been delegated, under section 6 of the *Ontario Energy Board Act, 1998*, the authority of the OEB to determine whether Enbridge Gas's 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-2020-0192 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 changes proposed by Enbridge Gas are not material. I hereby approve the proposed changes.

Yours truly,

Original Signed By

Pascale Duguay
Manager, Natural Gas Applications

cc: All the parties in the EB-2020-0192 proceeding.