



**BY E-MAIL**

June 14, 2021

Mr. Rakesh Torul  
Technical Manager, Regulatory Applications  
Enbridge Gas Inc.  
500 Consumers Road  
Toronto, ON M2J 1P8  
[EGIRegulatoryProceedings@enbridge.com](mailto: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. 3**

On May 26, 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) and an additional land purchase (Change Request No. 3).

The Change Request No. 3 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 28<sup>th</sup>, 2021<sup>1</sup>. 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 prior notice to and written approval of the OEB. In the event of an emergency, the OEB shall be informed immediately after the fact.

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

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. 3 affects a total of three properties along the OEB-approved Route:

- Two additional TLU areas to facilitate modified construction methods
- One additional land purchase for a station with additional surrounding TLU area

Enbridge Gas indicates that additional TLU rights are required to allow for modified construction methods. Enbridge Gas further states that recent detailed design work has identified areas where a road crossing should be shifted for safety and ease of installation resulting in the need for two additional TLU areas.

Enbridge Gas also states that further detailed design work has shown that the original location for a station was inadequate due to constructability issues with other utilities in the area resulting in an additional land purchase and TLU rights around that land.

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.

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 as per Ontario Ministry of Heritage, Sport, Tourism and Culture Industries guidelines.

According to Enbridge Gas, consultation with affected landowners is on-going and all landowners affected by the Change Request No. 3 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 rights and an additional land purchase will have no material impact on the overall Project costs. Enbridge Gas also states that the additional costs associated with the proposed changes will be allocated to the contingency budget for the Project.

The Change Request No. 3, 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. 3, 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.