

EB-2021-0205
Enbridge Gas Inc.
Application for Greenstone Pipeline Project Approval – Leave to Construct

Interrogatories of Minodahmun Development Limited Partnership (MDLP)

In accordance with Procedural Order No. 1, please find below MDLP's interrogatories in the above proceeding. These interrogatories have been forwarded to the applicant and to all other registered parties to this proceeding.

ISSUE 1.0 PROJECT ALTERNATIVES

1.2 MDLP.1 Ref: Exhibit C, Tab 1, Schedule 1, page 1, paragraph 1, paragraph 2

MDLP understands that Enbridge Gas concludes that the project does not warrant further natural gas Integrated Resource Planning (IRP) consideration. However, MDLP is interested in learning about demand side management opportunities and the potential to reduce the size of the Enbridge Gas infrastructure for the project, and/or to reduce the greenhouse gas emissions for the project.

- a) Please describe Enbridge Gas' demand side management (DSM) activities and commitments for residential, industrial/commercial and institutional customers in the Municipality of Greenstone, and nearby First Nation reserve communities.
- b) Please describe Enbridge Gas' commitments to supporting Greenstone Gold Mine LP with demand side management.
- c) Please describe Enbridge Gas' commitments to supporting Greenstone Gold Mine LP with reducing greenhouse gas emissions.

ISSUE 2.0: PROJECT COSTS AND ECONOMICS

2.2 MDLP.2 Ref: Exhibit D, Tab 1, Schedule 1, page 1, Table 1: Estimated Project Costs

MDLP understands Enbridge Gas estimates the total costs for the Project as \$25.8 M, consisting of \$23.0 M pipeline costs and \$2.7 M of ancillary facilities costs. Enbridge Gas does not provide costs related to the cost of consulting First Nations, costs related to accommodations for First Nations, or costs that might be attributed to services that can or will be provided by First Nation suppliers and contractors.

- a) Please provide an estimate of the Project costs of consulting First Nations for the Project.
- b) Please provide an estimate of the Project costs for accommodations for First Nations.
- c) Please provide an estimate of the Project costs that might be attributed to First Nation suppliers and contractors.

- d) Please provide Enbridge Gas' commitments to fostering reconciliation with Indigenous peoples and implementing the Truth and Reconciliation Commission's Calls to Action, specifically Call to Action #92:
- "We call upon the corporate sector in Canada to adopt the United Nations Declaration on the Rights of Indigenous Peoples as a reconciliation framework and to apply its principles, norms, and standards to corporate policy and core operational activities involving Indigenous peoples and their lands and resources. This would include, but not be limited to, the following:
- a. Commit to meaningful consultation, building respectful relationships, and obtaining the free, prior, and informed consent of Indigenous peoples before proceeding with economic development projects.
 - b. Ensure that Aboriginal peoples have equitable access to jobs, training, and education opportunities in the corporate sector, and that Aboriginal communities gain long-term sustainable benefits from economic development projects.
 - c. Provide education for management and staff on the history of Aboriginal peoples, including the history and legacy of residential schools, the United Nations Declaration on the Rights of Indigenous Peoples, Treaties and Aboriginal rights, Indigenous law, and Aboriginal-Crown relations. This will require skills based training in intercultural competency, conflict resolution, human rights, and anti-racism." (Truth and Reconciliation Commission)
- e) Please describe Enbridge Gas' approach to working with local Indigenous businesses to provide contracting opportunities related to the Project.

ISSUE 3.0: ENVIRONMENTAL IMPACTS

3.2 MDLP 3 Ref: Exhibit F, Tab 1, Schedule 1, pages 1-5; Evidence, Exhibit H, Tab 1, Schedule 1, Attachment 7, pages 1-118

The most recent record of consultation filed by Enbridge Gas for the Project is dated October 18, 2021.

- a) Please provide an updated Indigenous consultation record
- b) Please describe any commitments Enbridge Gas has made to Indigenous groups with respect to environmental and cultural heritage matters, and involvement in Environmental Protection Plan (EPP) planning and construction activities
- c) Please describe how Enbridge Gas' will integrate Indigenous Knowledge into environmental planning and mitigations.
- d) Please describe how Enbridge Gas will monitor the construction process and ensure local Indigenous communities are involved and informed.
- e) Please describe any commitments Enbridge Gas has made to Indigenous groups with respect to economic accommodations

- f) Please provide Enbridge Gas' understanding of how specific Indigenous inputs to reviews of the ESR are, or will be, reflected in EGI's approach to project construction and operation