



Enbridge Gas Inc.  
50 Keil Drive North  
Chatham, Ontario, Canada  
N7M 5M1

December 6, 2021

Christine Long  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EPCOR Natural Gas Limited Partnership  
Application for Approval of Franchise Agreements with and Amended Certificates of  
Public Convenience and Necessity for the Municipality of Brockton, the Township of  
Chatsworth and the Municipality of West Grey  
Ontario Energy Board File Number: EB-2021-0269**

Pursuant to Procedural Order No. 1 to the above noted proceeding, Enbridge Gas hereby submits its interrogatories to EPCOR Natural Gas.

Should you have any questions on this submission, please do not hesitate to contact me.

Yours truly,

Patrick McMahon  
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Encl.

c.c. (email only): Tim Hesselink, EPCOR Natural Gas Limited Partnership  
Daniela O'Callaghan, EPCOR Utilities Inc.

ENBRIDGE GAS INC.  
INTERROGATORIES TO EPCOR NATURAL GAS

1. **Reference:** EPCOR Application, page 4

*“9. ENGLP and Enbridge Gas Inc. (“Enbridge”) each have CPCNs for the Municipality of Brockton, the Municipality of West Grey and the Township of Chatsworth.”*

**Question:**

Please confirm EPCOR’s understanding that the CPCNs currently held by Enbridge Gas for the Municipality of Brockton, the Municipality of West Grey and the Township of Chatsworth cover all areas of these municipalities and are not currently limited.

2. **Reference:** EPCOR Application, page 5

*“12. The Franchise Agreements that ENGLP currently has with the Expansion Project Municipalities, originally executed for the South Bruce Project, and for which ENGLP is requesting the OEB’s approval as part of this application are included in Appendix B, Appendix C and Appendix D respectively.”*

**Questions:**

- (a) Please explain how the franchise agreements with the Municipality of Brockton (Appendix B), the Municipality of West Grey (Appendix C) and the Township of Chatsworth (Appendix D) were “executed” with effective dates and how associated bylaws received 3<sup>rd</sup> and final readings without the proposed franchise agreements first being approved by the Ontario Energy Board.
- (b) Please explain how the Ontario Energy Board can approve the proposed franchise agreements and CPCNs without first reviewing the leave to construct details of the proposed natural gas expansion project and determining that EPCOR’s proposals are in the public interest.
- (c) Please confirm that none of the bylaws and franchise agreements contained in Appendix B, Appendix C and Appendix D are currently effective.
- (d) Please confirm that each of the franchise agreements in Appendix B, Appendix C and Appendix D contain amendments to the Model Franchise Agreement approved by the Ontario Energy Board pursuant to the RP-1999-0048 Report to the Board. Please provide details of the amendments that have been made.
- (e) Please confirm what steps will be taken with / by the Municipality of Brockton, the Municipality of West Grey and the Township of Chatsworth with respect to their resolutions and bylaws should the OEB approve franchise agreements different from those originally agreed to by the municipalities.
- (f) Please confirm that the Ontario Energy Board has not issued any order directing and declaring that the assent of the municipal electors of each of the Municipality of Brockton, the Municipality of West Grey and the Township of Chatsworth is not necessary with respect to the franchise agreements in Appendix B, Appendix C and Appendix D that EPCOR indicates have been executed.

3. **Reference:** EPCOR Application, page 6

*“13. ENGLP confirms the leave-to-construct thresholds in subsection 90(1) of the OEB Act are triggered for the Project and accordingly will file a leave-to-construct application for the Project at a later date.”*

**Question:**

Please explain why the current application has been submitted instead of including requests for approvals of franchise agreements and CPCNs within a leave to construct application to allow for a more fulsome review.

4. **Reference:** EPCOR Application, pages 6-7

*“15. ENGLP has included three separate proposed draft CPCNs (as Appendixes G, H & I), which includes:*

- 1. The Municipality of Brockton (Appendix G)*
  - a. excluding areas within the Municipality located East of Bruce Road 3 and South of Concession Rd 4 West.*
- 2. The Municipality of West Grey (Appendix H), specifically:*
  - a. Bruce Road 10 starting at Bentinck-Sullivan Townline and ending at Concession Road 6*
  - b. East down Concession road 6 ending at Grey Road 3*
  - c. Continuing North on Grey Road 3 and ending at Bentinck-Sullivan Townline,*
- 3. The Township of Chatsworth (Appendix I), specifically:*
  - a. Bruce Road 10 starting at Bentinck-Sullivan Townline and ending at Sideroad*
  - b. Continuing East on Sideroad 7 ending at Grey Road 3*
  - c. Continuing South on Grey Road 3 and ending at Bentinck-Sullivan Townline.”*

**Questions:**

- (a) Please explain why the proposed CPCNs to be granted to EPCOR each contain a reference to replace parts of the CPCNs held by Enbridge Gas.
- (b) For the proposed CPCN for the Municipality of Brockton (Appendix G), please explain why the CPCN is for the whole municipality excluding the area “located East of Bruce Road 3 and South of Concession Rd 4 West” when EPCOR’s proposed facilities do not cover the whole municipality excluding this specific area.
- (c) Please provide a draft CPCN for the Municipality of Brockton which is limited to a lots and concessions description of the location of EPCOR’s proposed facilities within the municipality.
- (d) Please provide a draft CPCN for the Municipality of West Grey which is limited to a lots and concessions description of the location of EPCOR’s proposed facilities within the municipality.
- (e) Please provide a draft CPCN for the Township of Chatsworth which is limited to a lots and concessions description of the location of EPCOR’s proposed facilities within the municipality.

5. **Reference:** EPCOR Application, page 7

*“16. ENGLP’s requests of the OEB in this application align with the Province of Ontario’s award of Phase II grant funding to ENGLP for the Project.”*

**Questions:**

- (a) Please explain what is meant by this reference.
- (b) Please confirm EPCOR’s understanding that the approval of funding assistance for its proposed project is subject to obtaining all necessary approvals from the Ontario Energy Board to authorize the natural gas service expansion.
- (c) Please provide a copy of any quarterly reports submitted by EPCOR to the Ministry of Energy, Northern Development and Mines pursuant to Ontario Regulation 451/21.