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March 2, 2022

VIA EMAIL and RESS

Nancy Marconi Acting Registrar Ontario Energy Board 2300 Yonge Street, 27th Floor Toronto, ON M4P 1E4

Dear Nancy Marconi:

Re: Enbridge Gas Inc. (Enbridge Gas)

Ontario Energy Board (OEB) File: EB-2020-0293 St. Laurent Ottawa North Replacement Project Enbridge Gas Updated Responses to Interrogatories

In accordance with the Federation of Rental-housing Providers of Ontario's ("FRPO") correspondence dated February 25, 2022, enclosed please find the following updated interrogatory responses of Enbridge Gas in the above noted proceeding.

Exhibit	<u>Update</u>
Exhibit I.FRPO.23 c)	Pages 2 & 3 – Inserted Table 1 and corresponding explanations.
Exhibit I.FRPO.24	Page 1 – Inserted reference to Exhibit I.FRPO.23 c).
Exhibit I.M.2.FRPO.28 b)	Page 2 – Inserted reference to Exhibit I.FRPO.23 c).

Enbridge Gas is also providing updated responses to:

- Exhibit I.FRPO.14 a) Page 3 Inserted clarifications and detail regarding system leaks identified
 on the St. Laurent pipeline system.
- Exhibit I.M.2.1.STAFF.21 a) & b) Pages 2 & 3 Inserted updated Table 1 and accompanying explanation based on best available information, and a request for confirmation of the accuracy of Attachment 1 from the Sponsors in advance of the Technical Conference.

Please contact the undersigned if you have any questions.

Yours truly,

(Original Signed)

Adam Stiers

Manager, Regulatory Applications - Leave to Construct

c.c. Guri Pannu (Enbridge Gas Counsel) Charles Keizer (Torys) Zora Crnojacki (OEB Staff) Intervenors (EB-2020-0293)

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ENBRIDGE GAS INC.

Answer to Interrogatory from Federation of Rental-housing Providers of Ontario ("FRPO")

INTERROGATORY

Reference:

Exhibit B, Tab 1, Schedule 1, pg. 44-45 and Table 13

Preamble:

These estimates are conservative as they do not take into account specific locations for where the excavation required to complete a cut-out may have to occur. For comparison, Enbridge Gas repaired a leak in 2019 at the intersection of Industrial Avenue and St. Laurent Boulevard that cost \$3,182,217 due to challenges associated with the specific location.

We would like to understand the broader estimates in context of the decision to proceed with replacement.

Question:

From EGI's Distribution Integrity Management Program, please provide EGI's practice for the handling of leaks categorized by A, B and C.

a) For each of the last 10 years, please provide the number of leaks found on the proposed pipe to be replaced classified by each type, the number of leaks repaired and the total cost of repair for that year. Please distinguish upgraded leaks (e.g., C to B) from new leaks found.

Response

Please see in Figure 1 below, an excerpt of Enbridge Gas's Leak Operating Standard for the handling of leaks categorized by A, B and C:

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Figure 1:

Leak Operating Standard 3 Requirements 3 Requirements 3.1 Leak Classification and Corrective Actions Table 3-1: Above- and Below-Grade Leak Classification and Response Classification Response Class A - A leak on any asset Designate the leak as an emergency and respond immediately. that represents an existing or The leak must be continually monitored until repaired or probable hazard to persons or mitigated to reduce the leak classification followed by the property. corresponding monitoring and planned repair. Class B - A leak on any asset Repair the leak as soon as possible, not exceeding 70 days for classified as being nonhazardous below-grade leaks and 30 days for above-grade leaks. at the time of detection but For below grade leaks only: has the potential to become hazardous. . GDS staff must attend the site of the leak within seven days to verify the classification and begin pre-work. . Until repaired, monitor the leak a minimum of biweekly (15-day window) to ensure it does not intensify to an "A" leak. Class C - A leak on any Repair the leak as soon as reasonably possible, not exceeding non-plastic asset that is 30 days* for STO assets or 18 months for Distribution nonhazardous at the time Operations assets. of detection and can be Until repaired, monitor and reassess the leak at a minimum of reasonably expected to remain annually (within 12 months). nonhazardous Class N - A natural gas release If the natural gas release poses a risk to the public or property, that has been confirmed through the local authorities must be notified. investigation to be the result of a natural process and not related to company infrastructure leaks *C leaks on STO assets that cannot be reasonably repaired within 30 days are to follow the STO leak detection and repair (LDAR) process to determine an allowable extension that meets the Greenhouse Gas (GHG) emissions regulations. Note B or C leaks on Distribution Operations assets or B leaks on STO assets, where repair cannot be met within the response timeline, a mitigation plan must be submitted and approved through a Request for Variance prior to the initial due date.

unfortunately, Enbridge Gas was unable to gather the specific cost detail for all
of these events described below as certain of them were subsumed within

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broader integrity program expenditures. Where cost detail was readily available the Company has provided it.

As referenced in Exhibit B, Schedule 1, Tab 1, pp. 44-45, in 2019 a leak at the intersection of Industrial Avenue and St. Laurent Boulevard resulted in a cut-out. The cost of this repair was \$3,182,217.

/U

The Company's Distribution Integrity Management Program ("DIMP") Reliability Model only incorporates failures resulting in a loss of containment. Therefore, only one leak attributed to corrosion has been identified in the last 10 years. In 2013, a leak categorized as an A leak on Tremblay Road resulted in a cut-out of an 8 m segment of main due to corrosion. The cost of this repair was \$151,550.47.

/U

There are valve assets on the NPS 12 line that have also resulted in leaks but are not included in the DIMP Reliability Model as they were not classified as a corrosion leak. Two A leaks were recorded on valves in the past 10 years. One was located at 772 St. Laurent Boulevard in 2016. Another was located at 300 Tremblay Road in 2017. Two B leaks were recorded on valves in the past 10 years. One was located at 1200 Vanier Parkway in 2012. Another was located at 24 Sandridge Road in 2020. Two additional B leaks on valves were discovered on February 17, 2022. One was located on St. Laurent Blvd, south of Industrial Ave. The other was located on Tremblay Rd, east of Avenue U.

/U

There have been other repairs to the mains due to corrosion. These repairs were not a result of loss of containment and as such were not classified as leaks. In 2007, a special sleeve was welded over a corroded section of NPS 12 main on St. Laurent Boulevard south of Tremblay Road. In 2014, three sleeves were welded on the NPS 16 main at a cost of \$172,198.52 to address corrosion features. In 2017, the coating was replaced on the NPS 12 main on St. Laurent Boulevard between Cote Street and McArthur Avenue.

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ENBRIDGE GAS INC.

Answer to Interrogatory from Federation of Rental-housing Providers of Ontario ("FRPO")

INTERROGATORY

Preamble:

In FRPO.1, we had asked for some mapping of pipelines and provision of simulated pressures. Our inquiry must have been misunderstood as most of the requested mapping information was included in the map attached to ED.16. However, what was not included was the data requested on system pressures before and after the proposed replacement (Winter 2021/22 and Winter 2023/2024). We believe Table 2 in FRPO. 2 provides the simulated pressures at stations inlets for the winter of 2021/22.

Question:

- a) Please confirm that Table 2 in FRPO.2 provides simulated peak day station inlet pressures for 2021/22.
- b) Please confirm that the NPS 12 pipe that runs north from the Rideau Heights station eventually inter-connects through the Hurdman & Queensway station to the St. Laurent pipeline.
- c) Please provide a second table that exhibits the peak day station inlet pressures for the stations displayed in Table 2 in a peak-day simulation after the proposed replacement (to simplify, EGI can use the Winter 2021/22 simulated demands assuming the St. Laurent pipe is replaced as per the application).

Response

- a) The simulated inlet pressures are peak winter conditions at the time of analysis (2020/2021). The Company does not expect pressures for 2021/2022 to be materially different.
- b) The NPS12 pipeline that connects Harmer & Carling Station with Hurdman & Queensway Station is part of a 379 kPa (55 psig) network that supplies customers in downtown Ottawa. While both stations provide benefit to the 379 kPa (55 psig)

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network there is no capability to directly flow from the Rideau Heights pipeline to the St Laurent pipeline.

c) The pipeline replacement was design to meet existing capacity requirements and as such these station inlet pressures will not change materially following the completion of construction of the Project.

Please see Table 1 below for peak day inlet pressures (before and after replacement) for the stations shown in the Company's response at Exhibit I.FRPO.2, Table 2. Table 1 also includes: (i) station numbers corresponding to Exhibit B-1-1, Figure 1; (ii) station outlet pressures (set pressures); and (iii) peak day flows for each station. Enbridge Gas has also added the Rockcliffe Control District Station to Table 1.

¹ Outlet pressures in Table 1 remain constant as the Company is not adjusting downstream Maximum Operating Pressures.

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Table 1

Station Number	Description	Inlet Pressure Before Replacement (psi)	Inlet Pressure After XHP Replacement (psi)	Outlet (Set) Pressure (psi)	Peak Design Day Flows (m³/hr)²
3843404	BELFAST AT ST. LAURENT DISTRICT	235.5	234.9	55	2,971
6B979A	BIRCH @ SANDRIDGE DISTRICT	232.3	228.4	55	887
61976A	CLAREMONT & ST. LAURENT DISTRICT	237.2	233.4	30	481
62637A	COVENTRY & BELFAST DISTRICT	250.9	240.8	55	7,879
61171A	HURDMAN & QUEENSWAY DISTRICT	243.9	228.7	55	57,625
62106A	KAREN WAY & ST. LAURENT DISTRICT	238.7	234.9	45	463
6B882A	LANDSDOWNE RD N & HILLSDALE DISTRICT	228.4	224.5	55	3,279
6B467A	OGILVIE & CUMMINGS DISTRICT	253.8	252.0	55	8,523
6B558A	ROCKCLIFFE CONTROL DISTRICT	229.9	226.0	175	40,800
6B768A	ST LAURENT & MONTREAL DISTRICT	241.4	238.0	55	16,194
6B719A	ST. LAURENT & DUNBARTON DISTRICT	239.3	235.5	30	209

 $^{\rm 2}$ Service volumes directly fed by the St. Laurent pipeline system are not included in Table 1.

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ENBRIDGE GAS INC.

Answer to Interrogatory from Federation of Rental-housing Providers of Ontario ("FRPO")

INTERROGATORY

Question:

Please provide the peak day flows out and outlet pressure of each station for the preand post-replacement simulations.

- i) Please identify any system constraints that would restrict flow capability from the Rideau Heights station to St. Laurent.
- ii) For the results provided in Table 2 of FRPO.2, what was the simulated pressure setting of the Rideau Heights station feeding the NPS 12 northbound line.
 - (1) If the simulated setting was not 275 psig, please re-run the simulation using 275 psig and provide the resulting pressures and flows at the stations pre- and post-proposed replacement.

Response

Please see the response at Updated Exhibit I.FRPO.23 c).

- i) Please see the response at Exhibit I.FRPO.23 b).
- ii) The NPS 12 northbound line is limited by its MOP of 250 psig and cannot be raised to 275 psig. Please also see the response at Exhibit I.FRPO.23 b).

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ENBRIDGE GAS INC.

Answer to Interrogatory from Federation of Rental-housing Providers of Ontario ("FRPO")

INTERROGATORY

Reference:

Exhibit M, pg. 3

Preamble:

EGI evidence states: "Based on Enbridge Gas's design day modeling for the pipelines proposed to be replaced by the Project, peak design day demand is 139,800 m3/h. Current capacity of the pipelines proposed to be replaced by the Project is 157,900 m3/h. Future capacity of the proposed pipelines is projected to be 155,300 m3/h. Enbridge Gas models capacities of the St. Laurent pipeline system as a whole for the purposes of determining peak design demand...

...Using the best-case scenario of removing load from the end of the network/system, a reduction 32,500 m3/h is required to downsize the NPS 16 portion to NPS 12.."

We would like to understand more about the analysis that determined these values. For the interrogatories below, we refer to station inlet pressures collectively for the stations described in Table 1 & 2 of Exhibit I.FRPO.2 <u>AND additionally the Rockcliffe Control</u> Station.

Question:

In the determination of the current capacity above, please file the analyst report, simulation documentation and other internal reporting that informed the above figures in the evidence. If not answered in this documentation, please provide the following:

- a) Is the current peak day demand and current capacity for Winter of 2021/22?
 - i) If not, please provide the station inlet pressures for the design day peak hour of 139,800 m3/hr.
- b) Please provide a map showing the locations of the stations including THE Rockcliffe Control station.
- c) Please provide the inlet pressures for the stations when the current pipelines have a peak hour demand of 157,900 m3/hr?

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- d) Please confirm that there is no physical limitation (beyond system demands) to flow gas from the Rideau Heights station to the St. Laurent Line.
 - i) If there is any physical limitation, please provide the cost to eliminate the limitation.
 - ii) If there is no physical limitation, what was the outlet pressure of Rideau Heights station for the above simulations?
 - (1) If not 275 psig, please re-run the simulations using at 275 psig outlet pressure at Rideau Heights and provide the inlet pressures for the Table 2 stations and the resulting capacity.
- e) What are the control point and conditions that EGI uses to define the limit of 157,900 m3/hr as capacity (i.e., what and where is the pressure constraint and where is the additional hourly demand added to reach that capacity and pressure)?
 - i) If the pressure constraint is the required pressure for capacity through a station:
 - (1) What station provides the constraint?
 - (2) Please provide the cost to upgrade the station to eliminate the constraint and provide the resulting incremental capacity.
 - (3) With station upgraded to allow lower inlet pressure, what is the next constraint and resulting capacity?

Response

- a) Yes, peak day demand and current capacity are for Winter of 2021/2022.
- b) Please see Exhibit B, Tab 1, Schedule 1, Figure 1 for a map of St. Laurent pipeline system stations. Please also see the response at Updated Exhibit I.FRPO.23 c), for a legend identifying station names corresponding with station numbers.

c) Station inlet pressures for the St Laurent pipeline system at peak hour demand of 157,900 m³/hr are set out in Table 1 below.

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Table 1

Description	Inlet Pressure (psig)
BELFAST AT ST. LAURENT DISTRICT	235
BIRCH @ SANDRIDGE DISTRICT	207
CLAREMONT & ST. LAURENT DISTRICT	216
COVENTRY & BELFAST DISTRICT	244
HURDMAN & QUEENSWAY DISTRICT	239
KAREN WAY & ST. LAURENT DISTRICT	219
LANDSDOWNE RD N & HILLSDALE DISTRICT	200
OGILVIE & CUMMINGS DISTRICT	247
ROCKCLIFFE CONTROL DISTRICT	200
ST LAURENT & MONTREAL DISTRICT	225
ST. LAURENT & DUNBARTON DISTRICT	221

- d) Not confirmed. There is a physical limitation preventing the flow of natural gas as the Rideau Heights station is not directly connected to the St. Laurent pipeline system. The Rideau Heights station and a station fed by the St. Laurent pipeline both supply a nearby lower pressure system.
 - i) To eliminate the physical limitation discussed, a new NPS 16 pipeline a minimum of 9 km in length (direct point-to-point alignment) would need to be constructed to connect the Rideau Heights inlet to the Hurdman Station inlet. The construction of such a pipeline through this alignment would be very challenging as the route is heavily developed (urban). Thus, Enbridge Gas expects that the cost to construct a new NPS 16 pipeline to connect the Rideau Heights inlet to the Hurdman Station inlet would be similar in magnitude to the proposed Project.

Importantly, such a pipeline would only provide enough incremental capacity to reduce the initial portion of the proposed Project from NPS 16 to NPS 12 and would not resolve the integrity concerns associated with the ongoing deterioration and degradation of the existing St. Laurent pipeline system. As previously stated by Enbridge Gas in its response at Exhibit I.ED.12:

In Enbridge Gas's experience, the majority of costs associated with projects of this nature relate to labour and construction activities/equipment that would be incurred regardless of the ultimate size of pipeline installed.

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Said another way, eliminating the physical limitation as described above would nearly double the total cost to ratepayers.

- ii) N/A.
- e) To determine the limit of 157,900 m³/hr the system was assumed to have an increased demand at the end of the pipeline.
 - i) (1) Rockcliffe Station
 - (2) Please see the response at Exhibit I.M.2.FRPO.29.
 - (3) Rockcliffe Station would remain the constraint on the St. Laurent pipeline system despite any adjustments considered as it has the highest outlet pressure requirement.

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Exhibit I.M.2.1.STAFF.21

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Plus Attachment /U

ENBRIDGE GAS INC.

Answer to Interrogatory from OEB Staff ("STAFF")

INTERROGATORY

Reference:

Enbridge Gas Responding Evidence, pages 3-4

Preamble:

Enbridge Gas estimates the potential peak design day reductions from the Cliff Street Heating Plant, City of Ottawa sites, and OCHC sites served by the St. Laurent pipeline.

Question:

- a) Are the potential peak design day reductions shown in Table 1 equivalent to the historical demand from these buildings on a specific day? If not, please provide Enbridge Gas's methodology for converting actual historical demand data to peak design day demand.
- b) Enbridge Gas notes that "Table 1 excludes peak design day demand for buildings cited in the Evidence where the Company was not able to confirm their address and location relative to the St. Laurent pipeline system." Please estimate the potential peak design day demand reductions if only buildings definitively known to not be served by the St. Laurent pipeline (e.g., the OC Transpo bus garage facilities) were excluded from this analysis, and buildings of uncertain status are included. If this is not feasible, please provide the supporting rationale for Enbridge Gas's statement that "the volumes associated with these excluded buildings would not materially change the Company's conclusions regarding peak design day demand or the design of the Project."

Response

a) & b)

Enbridge Gas compiled Table 1 using actual monthly customer billing/demand data (which is commercially sensitive) for buildings cited in the Sponsors' Evidence that

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were readily identifiable based on the limited information provided.¹ The Company matched this billing data with corresponding St. Laurent pipeline system degree day weather information for the same time period and used a linear regression to extrapolate this data for design day condition.

Enbridge Gas's rationale for the statement cited by OEB Staff is that the Company was able to identify with reasonable certainty the location and consumption data (billing data) for 86% of the buildings listed by the City of Ottawa and OCH within the Sponsors' evidence and reflected the same in Table 1 (excluding the OC Transpo bus garage facilities). The Company does not expect that the remaining 14% of the buildings listed, which it was unable to locate with certainty absent a street address, will materially change its conclusions in this regard.

Using the address information provided by the Sponsors at Exhibit M.1/2.EGI.12 part (b) and through additional research to locate remaining City of Ottawa buildings that were excluded from the Company's Responding Evidence (January 27, 2022) Enbridge Gas has reproduced Table 1 below with its best estimate of the impacts of demand reductions cited by the Sponsors under peak design day conditions:

Table 1

Customer Group	Peak Design Day Demand (m³/h)
Cliff St District Heating	7,565
City of Ottawa Sites	761
OHCH Sites	2,720
Total	11,046

Accordingly, the conclusions set out in the Company's Responding evidence remains unchanged as a result of this revised estimate. Assuming the demand reduction is 100% effective immediately with no use of methane (Natural Gas or RNG) and is located in the optimal part of the pipeline system (end of system) the 11,046 m³/h reduction does not meet the required 32,500 m³/h reduction to downsize the NPS 16 portion of the pipeline.²

In order to complete the revisions to Table 1 above, the Company requested (via interrogatory Exhibit M.1/2.EGI.13) that the Sponsors provide a list of street addresses of all buildings set out on page 183 of the Sponsors' evidence. Despite agreeing to provide similar information for Ottawa Community Housing buildings

¹ The Company was able to identify actual customer billing information for approximately 86% of the buildings cited in this manner.

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² Neither of these assumptions are likely.

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(Exhibit M.1/2.EGI.12 part (b)) the Sponsors refused to provide the information sought, claiming it was not relevant. Enbridge Gas has made best efforts to create the list of addresses set out at Attachment 1 to this response and requests that the Sponsors confirm its accuracy in advance of the Technical Conference.

Site	Municipal Address
Ottawa City Hall	110 Laurier Ave W, Ottawa, ON K1P 1J1
Beacon Hill Community Ctr *Beacon Hill North Community Hall	2130 Radford Ct, Gloucester, ON K1J 6Z6
Bernard GrandMaitre Arena *Bernard Grandmaître Aréna	309 McArthur Ave., Vanier, ON K1L 6P1
Bingham Park Comfort Station	1600 Darlington Park Rd, Bowmanville, ON L1C 3K3
Brantwood Park Field House and Pavilion	5-29 Burnham Rd, Ottawa, ON K1S 0J8
Brewer Park Pool Complex	100 Brewer Way, Ottawa, ON K1S 5T1
Centre Richelieu *Richelieu Vanier Community Cenre	300 Des, Pères-Blancs Ave, Ottawa, ON K1L 7L5
Champagne Bath Pool *Champagne Fitness Centre	321 King Edward Ave, Ottawa, ON K1N 7M5
Don Gamble - St. Laurent Complex	56 College Cir, Ottawa, ON K1K 4R8
Earl Armsrong Arena *Earl Armstrong Arena	2020 Ogilvie Rd, Gloucester, ON K1J 7N8
Elections Office and Warehouse	1221 Cyrville Rd Unit B, Gloucester, ON K1J 7S8
Fire Station 51	900 Montréal Rd, Ottawa, ON K1L 0S8
Fire Station 56	275 Coventry Rd, Ottawa, ON K1K 3X6
Fire Station 57	220 Beechwood Ave., Vanier, ON K1L 8A8
Garry J Armstrong LTC	200 Island Lodge Rd, Ottawa, ON K1N 5M2
Gil O Gilian FH *Gil-O-Julien Park	201 Donald St, Ottawa, ON K1K 1N1
Hurdman Yard Office and Garage	29 Ch. Hurdman Rd, Ottawa, ON K1N 8N8
Jack Purcell Recreation Centre *Jack Purcell Community Centre	320 Jack Purcell Ln, Ottawa, ON K2P 2J5
Jardiniere Tournesol Care Ctr	194 mcarthur Avenue Vanier, ON K1L6P5
Jules Morin Field House	400 Clarenece Street East, Ottawa, Ontario K1N 5N8
LindenLea Community Centre *Lindenlea Community Centre	15 Rockcliffe Way, Ottawa, ON K1M 1A9
Lowertown Pool Complex	40 Cobourg St, Ottawa, ON K1N 5N8
Montreal Road EMS *Ottawa Ambulance Post - Montreal Road	Ottawa, ON K1L 7N6
Montreal Road Pumping Station	989 Montréal Rd, Ottawa, ON K1K 0S6
OC Transpo 899 Belfast *OC Transpo Belfast Yard	805 Belfast Rd, Ottawa, ON K1G 0Z4
OC Transpo North + South Garage *OC Transpo North Garage	1500 St. Laurent Boulevard in Ottawa, Ontario
OC Transpo South Garage *Colonnade Garage	164 Colonnade Rd, Nepean, ON K2E 7T7
OPL North Gloucester Branch	2036 Ogilvie Rd, Gloucester, ON K1J 7N8
OPL Sunnyside Branch	1049 Bank St, Ottawa, ON K1S 3W9
Ottawa East Community Centre *Old Ottawa East Community Centre	61 Main St, Ottawa, ON K1S 1B3
Ottawa South Community Ctr	260 Sunnyside Ave, Ottawa, ON K1S 0R7
Ottawa Workers' Heritage Ctr	500-280 Metcalfe Street, Ottawa, ON, K2P 1R7
Overbrooke Pool * Overbrook Community Centre	33 Quill Street Ottawa, ON K1K 4E7
Pat Clarke Community Centre *Pat Clark Community Centre	4355 Halmont Dr, Gloucester, ON K1J 8W6
Raymond Charbot Grant Thorton Park *Raymond Chabot Grant Thornton Park	302 Coventry Rd, Ottawa, ON K1K 4P5
Rideau Library *OPL - Rideau Branch	377 Rideau St, Ottawa, ON K1N 5Y6
Rideau Rockcliffe Community Centre *Rideau-Rockcliffe Community Resource Centre	815 St. Laurent Blvd. Ottawa, ON K1K 3A7
Rockcliffe Park Community Centre	380 Springfield Road, Ottawa, ON K1M 0K7
Routhier School Community Ctr *Routhier Community Centre	172 Guigues Avenue, Ottawa, ON K1N 5H9
Sandy Hill Arena	60 Mann Ave, Ottawa, ON K1N 6Y5
Sandy Hill Community Ctr	250 Somerset Street East Ottawa, ON K1N 6V6
Splash Wave Pool (East)	2040 Ogilvie Rd, Gloucester, ON K1J 7N8
Vanier Garage *OC Transpo Vanier Garage	•
Vanier Library *OPL - Vanier Library	310 Pères-Blancs Ave, Vanier, ON K1L 7L5
Village Green Park Chalet	• •
Westboro Academy	1000 Brookfield Rd E, Ottawa, ON K1V 6J1