

**ONTARIO ENERGY BOARD****Enbridge Gas Inc.**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B; and in particular sections 40(1) and 91 thereof;

**AND IN THE MATTER OF** an application by Enbridge Gas Inc., for a favourable report to the Ministry of Northern Development, Mines, Natural Resources and Forestry to support a license to drill gas storage wells and for an order or orders granting leave to construct a related gathering pipeline.

**EB-2021-0248****Proposed Coveny & Kimball-Colinville Well Drilling Project****SUBMISSION OF**

**CHIPPEWAS OF KETTLE AND STONY POINT FIRST NATION / SOUTHWIND DEVELOPMENT CORPORATION INC. ("CKSPFN")**

**TO ENBRIDGE GAS INC. ("EGI")**

**March 18, 2022**Background

Enbridge Gas Inc. ("Enbridge") has applied to the Ministry of Northern Development, Mines, Natural Resource and Forestry ("MNDMNR") pursuant to the Oil, Gas and Salt Resources Act ("OGSRA") to drill the following wells:

- a) an A-1 observation well (TCV 7) to be drilled in the Coveny Designated Storage Area ("DSA") to monitor natural gas content and pressure in the underground storage formation and to assist in the continued safe and reliable operation of Enbridge's storage facilities; and
- b) A vertical gas storage well (TKC 68) to be drilled in the Kimball-Colinville DSA to partially replace deliverability lost from that pool as a result of recent abandonment of 6 storage wells in that DSA.

The proposed project is situated on the treaty lands of the Chippewas of Kettle and Stony Point First Nation (CKSPFN). TKC 68 is proposed on the lands of the Huron Tract, Treaty No. 29. TCV 7 is proposed on the lands of the Sombra Township Treaty No. 7.

For over 100 years, we have witnessed the cumulative impacts of the expansion of energy infrastructure across our territory, including oil, gas, petrochemical, power generation, and electricity transmission

facilities on a massive scale. Much of this Crown approved infrastructure has been responsible for huge quantities of greenhouse gas emissions contributing to climate change.

The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) was adopted by the General Assembly on September 13, 2007. With the federal government's *Bill C-15 An Act respecting the United Nations Declaration on the Rights of Indigenous Peoples*, the Government of Canada must take all measures necessary to ensure that the laws of Canada are consistent with UNDRIP.

The preamble of Bill C-15 refers to the Calls to Action - Truth and Reconciliation Commission of Canada<sup>1</sup>, the Calls for Justice - National Inquiry into Missing and Murdered Indigenous Women and Girls<sup>2</sup>, and acknowledges that **provincial** governments can establish their own approaches to contributing to the implementation of the Declaration by taking various measures that fall within their authority.

CKSPFN notes that the OEB's mandate and authority come from the *Ontario Energy Board Act, 1998*, the *Electricity Act, 1998*, and a number of other provincial statutes including: the *Energy Consumer Protection Act, 2010*, the *Municipal Franchises Act*, the *Oil, Gas and Salt Resources Act*, the *Assessment Act*, and the *Toronto District Heating Corporation Act*.

### Climate Change

CKSPFN would like to highlight the following subsections of the *Ontario Energy Board Act, 1998*, which outline the Board's objectives regarding natural gas in the province.

Section 2 - The Board, in carrying out its responsibilities under this or any other Act in relation to gas, shall be guided by the following objectives:

Subsection 3 – To facilitate rational expansion of transmission and distribution systems.

Subsection 4 – To facilitate rational development and safe operation of gas storage.

Subsection 5 – To promote energy conservation and energy efficiency in accordance with the policies of the Government of Ontario, including having regard to the consumer's economic circumstances.

Rational expansion and rational development must include consideration of the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report<sup>3</sup>, which states in the Summary for Policymakers:

**"It is unequivocal that climate change has already disrupted human and natural systems. Past and current development trends (past emissions, development and climate change) have not advanced global climate resilient development (very high confidence). Societal choices and actions implemented in the next decade determine the extent to which medium and long-term pathways will deliver higher or lower climate resilient development (high confidence). Importantly climate resilient development prospects are increasingly limited if current greenhouse gas emissions do not rapidly decline,**

<sup>1</sup> [https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/indigenous-people/aboriginal-peoples-documents/calls\\_to\\_action\\_english2.pdf](https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/indigenous-people/aboriginal-peoples-documents/calls_to_action_english2.pdf)

<sup>2</sup> [https://www.mmiwg-ffada.ca/wp-content/uploads/2019/06/Calls\\_for\\_Justice.pdf](https://www.mmiwg-ffada.ca/wp-content/uploads/2019/06/Calls_for_Justice.pdf)

<sup>3</sup> IPCC Sixth Assessment Report, retrieved at <https://www.ipcc.ch/report/ar6/wg2/>

**especially if 1.5°C global warming is exceeded in the near-term** (high confidence). These prospects are constrained by past development, emissions and climate change, and enabled by inclusive governance, adequate and appropriate human and technological resources, information, capacities and finance (high confidence)” (IPCC Sixth Assessment Report, 2022. p. 35)

CKSPFN is concerned that the continued planning and development of natural gas expansion across our treaty territory in relation to the largely ignored issue of fugitive emissions cannot be considered rational expansion and rational development. These activities are not part of a coherent provincial Crown energy plan, or similar comprehensive energy plan overseen by the Board that considers greenhouse gas emissions, considers the impact of lost energy resources on the ratepayers of Ontario, or considers cumulative impacts on natural heritage that is also linked to climate change and climate change resilience.

CKSPFN made a request for information regarding fugitive emissions in CKSPFN IR 2.2 and 4.14. Enbridge responded that, “Considering the fugitive emissions due to operations only, the addition of a new injection/withdrawal well and associated pipelines and a new observation well would result in an increase of approximately 20 tCO<sub>2</sub>e/year/well.”<sup>4</sup>

CKSPFN took that information and determined that 20 tCO<sub>2</sub>e is equal to 80,892 km driven by an average passenger vehicle. So, operation only of each well likely represents driving across Canada 10 times along the 8030 km TransCanada highway, per well. This does not include fugitive emissions from aging pipelines. From CKSPFN’s limited knowledge, we now understand Enbridge operates at least 100 active gas wells, just in the Dow A, Dow Moore, Corunna, Seckerton, Payne, Kimball-Colinville, and Ladysmith storage pools. These 100 wells are likely only a fraction of the number of wells in operation in the Dawn Hub network of natural gas storage infrastructure. For reference, the fugitive emissions of 100 wells at 20 tCO<sub>2</sub>e per well is roughly equivalent to burning over 2 million pounds of coal.<sup>5</sup> Not only is this major emissions issue, but it is likely that the cost of leaked natural gas ultimately impacts the ratepayer through significant loss of valuable energy product, the costs of which are no doubt passed on to ratepayers.

Ontario may have closed coal plants, but the province still has a major GHG problem that impacts the ratepayer from both a financial and quality of life cost perspective, especially when climate impacts are accounted for. Therefore, fugitive emissions require significant provincial Crown oversight based on the principles of rational expansion and rational development.

Enbridge’s response to CKSPFN noted that, “Enbridge Gas monitors fugitive emissions from its gas storage and distribution systems. In 2020, a more robust leak detection and repair (“LDAR”) program was implemented to identify fugitive emissions within the Company’s storage and transmission facilities. Additionally, Enbridge Gas conducts regular leak surveys of its distribution assets.”<sup>6</sup> CKSPFN looks forward to working with Enbridge, the Board and the provincial Crown, to better understand the fugitive emissions issue across our treaty territory and to collaborate together on natural gas infrastructure planning based on the principles of rational expansion and rational development, and to reduce impacts of fugitive emissions on the ratepayers of Ontario while reducing climate change impacts.

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<sup>4</sup> See EB-2021-0248, Redacted\_EGI\_IRR\_20220309, received by the OEB 2022-03-09

<sup>5</sup> Greenhouse Gas Equivalencies Calculator, US EPA - <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator> A

<sup>6</sup> See EB-2021-0248, Redacted\_EGI\_IRR\_20220309, received by the OEB 2022-03-09

In its consideration of alternatives, Enbridge did not consider any non-gas options because, “There are no non-gas alternatives that meet the stated Project need. Further, non-gas alternatives such as electricity-based alternatives have been specifically excluded from alternatives for which Enbridge Gas may be able to receive IRP funding to pursue per the OEB’s IRP Framework”<sup>7</sup>. Without non-gas options, Enbridge Gas will continue to emit fugitive emissions from the proposed Project, contributing to cumulative impacts from fugitive emissions, and contributing further costs to ratepayers.

#### Cumulative Impacts and the Duty to Consult and Accommodate

Union Gas opened the Dawn Storage Hub in 1942, with an initial capacity of approximately 3.4 billion cubic feet (Bcf). In 1957, Dawn storage became available to other gas distribution companies. In 1964, Enbridge opened the Tecumseh storage pool near Dawn. From 1978 to 2001, 16 new Dawn storage pools entered into service. By 2009, 34 underground storage pools were in operation in the Dawn area. By 2017 – 75 years after its creation – the Dawn Storage Hub had a working capacity of 274 Bcf.<sup>8</sup> This massive growth in gas storage brought further impacts in the way of land disturbance for pipelines, transmission lines, access roads, etc. With the merger of Union Gas and Enbridge Gas Distribution, Enbridge Inc. now controls most of the gas storage and distribution across Chippewas of Kettle and Stony Point territory. At 281 Bcf, Enbridge’s Dawn Hub holds enough gas to fill the Rogers Center 4,973 times.

“The obligation to consult rests with the federal and provincial governments. In *Haida Nation*, the Supreme Court held that the honour of the Crown cannot be delegated to third parties and neither can the duty to consult. As a result, resource development companies do not have an obligation to consult. The Crown may delegate procedural aspects of consultation to proponents, but the ultimate legal responsibility for consultation and accommodation rests with the Crown.”<sup>9</sup> Ultimately, the OEB must ensure the Duty to Consult is appropriately met.

Section 35 of the Constitution Act, 1982 recognizes and affirms the existing Aboriginal and treaty rights of the Aboriginal peoples of Canada. The Crown’s duty to consult and accommodate arises when the Crown contemplates an action or makes a decision that may have an appreciable adverse effect on potential or proven Aboriginal or treaty rights.<sup>10</sup> Section 3.3 of the OEB Environmental Guidelines specifies that, “The applicant is expected to file with the OEB the letter from the Ministry of Energy and keep the summary of the consultation record up to date until the OEB renders its decision.”<sup>11</sup> Enbridge has not updated the consultation log with the OEB. The consultation log Enbridge filed with the OEB on March 9, 2022<sup>12</sup>, cites February 11, 2022, as the last consultation engagement, even though numerous email exchanges occurred between February 11 and March 9, including CKSPFN sharing meeting minutes with action items and emails to Enbridge with requests for information that are still outstanding.

<sup>7</sup> See EB-2021-0248, Redacted\_EGI\_IRR\_20220309, received by the OEB 2022-03-09

<sup>8</sup> “19-GTEN 208 Dawn Hub and Compressor Utilization” – Presentation by Paul Medd, Enbridge Gas Inc. to GTEN 2019 Symposium, October 2019, retrieved from <http://www.gten.ca/downloads/2019/presentations/19-GTEN-208-Pres%20-%20Dawn%20Hub%20and%20Compressor%20Utilization.pdf>

<sup>9</sup> Shelsen-Crowns-Duty-to-Consult.pdf (goldblattpartners.com)

<sup>10</sup> Ontario Energy Board, Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 7<sup>th</sup> Edition, 2016, retrieved at <https://www.oeb.ca/sites/default/files/uploads/documents/regulatorycodes/2019-01/Environmental-Guidelines-HydrocarbonPipelines-20160811.pdf>

<sup>11</sup> Ibid., page 18

<sup>12</sup> See EB-2021-0248, Redacted\_EGI\_IRR\_20220309, received by the OEB 2022-03-09

Further, in our interrogatory submission, CKSPFN identified several project-specific environmental concerns, which have not been adequately addressed to date. CKSPFN would have expected these project specific concerns to be reflected in the March 9, 2022, Interrogatory Response from Enbridge. Unacceptably, CKSPFN concerns were largely dismissed.

In the CKSPFN Interrogatory 6.2, CKSPFN asked Enbridge to provide information they had obtained regarding how the Project may adversely affect Aboriginal or treaty rights. Enbridge's response on page 130 of 141 simply stated, "Please see the response at Exhibit I.STAFF.8".<sup>13</sup> The exhibit in Enbridge's response was a reference to the flawed consultation log mentioned above. Enbridge made no mention of how Aboriginal or treaty rights were considered. CKSPFN is concerned that Enbridge has yet to undertake any meaningful actions to fulfill the procedural aspects of the Duty to Consult. The Ministry of Energy, Northern Development and Mines clearly outlined the steps Enbridge must take in their delegation letter. CKSPFN wishes to remind the OEB and Enbridge that according to this delegation letter, the roles and responsibilities delegated to the proponent were described as follows, "On behalf of the Crown, please be advised that your responsibilities as Project Proponent for this Project include:

- Providing notice and information about the Project to Indigenous communities, with sufficient detail and at a stage in the process that allows the communities to prepare their views on the Project and, if appropriate, for changes to be made to the Project. This can include:
  - maps of the Project location and any other affected area(s)
  - information about the potential negative effects of the Project on the environment, including their severity, geographic scope and likely duration. This can include, but is not limited to, effects on ecologically sensitive areas, water bodies, wetlands, forests or the habitat of species at risk and habitat corridors
  - any additional information that might be helpful to the community
- Considering and responding to comments and concerns raised by Indigenous communities and answering questions about the Project and its potential impacts on Aboriginal or treaty rights.
- Informing Indigenous communities about how their concerns were taken into consideration and whether the Project proposal was altered in response. It is considered a best practice to provide the Indigenous community with a copy of the consultation record as part of this step for verification."<sup>14</sup>

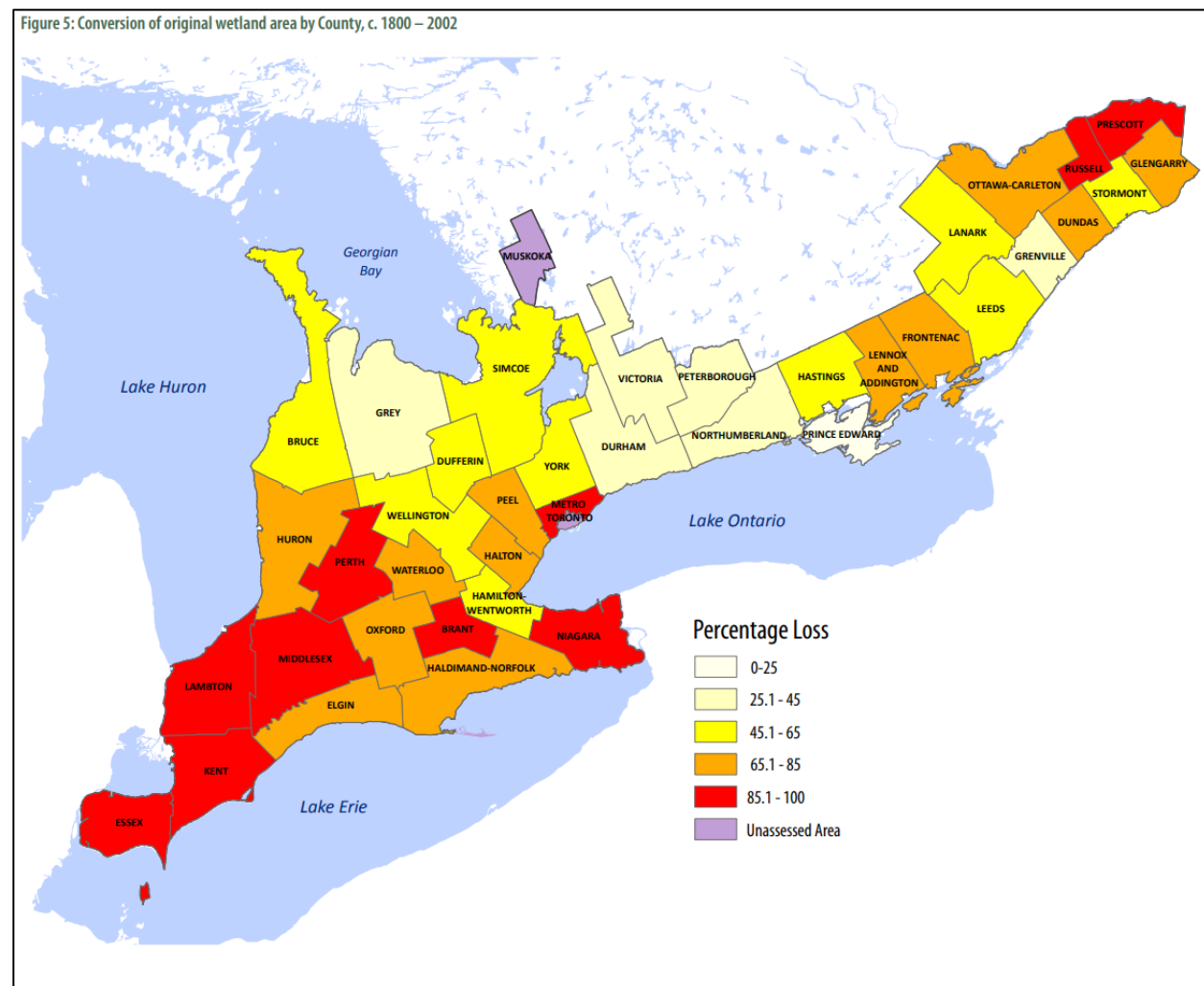
CKSPFN is concerned about the piecemeal approach of the regulatory process that is not based on the principles of rational expansion and rational development, and does not include an assessment of the cumulative impacts of Enbridge gas infrastructure across CKSPFN treaty lands. Effects on ecologically sensitive areas, waterbodies, wetlands, forests or the habitat of Species at Risk and habitat corridors are all cumulative in nature and must be regarded at the landscape-level, not only in the immediate project area. Similarly, the effects of historic and ongoing fugitive emissions from current and proposed infrastructure are cumulative in nature, and we are already seeing devastating climate impacts of these, with an ever-narrowing window to make drastic emissions reductions as outlined in the IPCC's Sixth Assessment Report (2022). Nature does not define impact on a project-by-project basis, and neither should we. Our territory was once a lush Carolinian forest with beautiful, unique, and connected habitat

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<sup>13</sup> See EB-2021-0248, Redacted\_EGI\_IRR\_20220309, received by the OEB 2022-03-09

<sup>14</sup> Ministry of Energy, Northern Development and Mines, June 1, 2021, Letter of Delegation to Enbridge Gas Inc., Appendix: Procedural Consultation, located at 2021-12-14, EB-2021-0248, Exhibit F, Tab 1, Schedule 1, Attachment 1, Page 73 of 153

enjoyed by all relatives. The devastation to these relatives is striking, less than 15% of wetland area currently remains in the counties most directly impacted by oil and gas activities when compared to the pre-colonial landscape (Map 1 below).<sup>15</sup>



Map 1: Percentage loss of wetland area by county from 1800-2002, taken from Ducks Unlimited Canada's (2010)<sup>15</sup> Southern Ontario Wetland Conversion Analysis.

CKSPFN is concerned about Enbridge's approach to amphibians, especially due to their sensitivity to contaminants. In Enbridge's response to CKSPFN IR 4.5, Enbridge stated that, "Amphibian breeding habitat was identified as *potentially* occurring in the wooded area near the TCV 7 Study Area. As the Project activities avoid direct interaction with this area, no field investigations will be undertaken."<sup>16</sup> Much of the potential habitat for relatives, including amphibians has been destroyed through a project-by-project sacrifice that does not consider the potentially devastating indirect impacts of these activities.

<sup>15</sup> Final Report, Southern Ontario Wetland Conversion Analysis, March 2010, retrieved from [http://longpointbiosphere.com/download/Environment/duc\\_ontariowca\\_optimized.pdf](http://longpointbiosphere.com/download/Environment/duc_ontariowca_optimized.pdf)

<sup>16</sup> See EB-2021-0248, Redacted\_EGI\_IRR\_20220309, received by the OEB 2022-03-09

CKSPFN wishes to remind the OEB, Ministry of Energy, and Enbridge about the Blueberry River First Nation ruling in the Supreme Court of British Columbia (*Yahey v. British Columbia*). In the landmark decision, the courts found that Blueberry's treaty rights were violated by the overall effect of thousands of energy projects and other developments in their traditional territories. In her decision, Justice Emily Burke wrote, "I find that the Province's conduct over a period of many years – by allowing industrial development in Blueberry's territory at an extensive scale without assessing the cumulative impacts of this development and ensuring that Blueberry would be able to continue meaningfully exercising its treaty rights in its territory – has breached the Treaty."<sup>17</sup>

In a recent March 9, 2022, article in the Globe and Mail, BC MLA Josie Osborne, Minister of Land, Water and Resource Stewardship said, "We know that no longer can we look at things on a case-by-case basis, a permit-by-permit basis, a project-by-project basis. The Yahey decision helps to underscore the importance of addressing things like cumulative impacts in a more holistic way."<sup>18</sup>

During a February 11, 2022 meeting between CKSPFN and Enbridge, Enbridge shared a presentation that included a brief description of numerous planned projects in CKSPFN territory, including the 2022 Storage Enhancement project, the Coveny and Kimball-Colinville well drilling project, the Dawn to Corunna pipeline project, and the Panhandle Regional Expansion Project, which includes the Panhandle loop, Leamington interconnect, Talbot Road Reinforcement, and Wheatley Lateral Reinforcement. This presentation confirmed what CKSPFN knows well. Enbridge is rapidly expanding their gas infrastructure across our treaty lands in a manner that ignores the true cumulative impact on our Nation's rights and interests.

Enbridge operates hundreds of kilometers of pipelines across our territory and stores enough gas in the Dawn Hub to fill 4,973 Rogers Centers<sup>19</sup>. Despite our requests, Enbridge has yet to disclose the full picture of their network – both existing and planned development. CKSPFN points to the proposed project in question here – the Coveny and Kimball-Colinville well drilling project – to illustrate how the piecemeal approach can both limit our First Nation's understanding of the potential impacts to our Aboriginal or Treaty Rights and prevent our First Nation from understanding potential impacts, even when provided the opportunity to submit interrogatories through the OEB process.

The February 11, 2022, presentation included the following information on the Coveny and Kimball-Colinville Well Drilling Project:

- Involves drilling a new injection/withdrawal well (TKC 68) in the LEG Kimball-Colinville Storage Pool in May/June 2022
- TKC 68 will require approximately 120 metres of 10" lateral pipeline to connect to the main Kimball-Colinville gathering line
- Project filed with OEB on December 14, 2021
- TKC 68 is in a rotational agricultural field and is not suitable to SAR habitat
- Species of Conservation Concern and SAR are not anticipated to be impacted by project activities
- Archaeological work for TKC 68 is complete

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<sup>17</sup> Yahey v British Columbia, 2021 BCSC 1287 (CanLII), <<https://canlii.ca/t/jgpbr>>, retrieved on 2022-03-17

<sup>18</sup> Globe and Mail, How a tiny First Nation forced an overhaul of land use, retrieved at <https://www.theglobeandmail.com/canada/british-columbia/article-how-a-tiny-first-nation-forced-an-overhaul-of-land-use/>

<sup>19</sup> Dawn Storage Capacity of 281 billion cubic feet / Rogers Centre 56.5 million cubic feet = approx. 4,973

- Enbridge's CKC Project kick-off was on June 8, 2021
- Current status – "Ministry of Energy will be reaching out to discuss"

Despite CKSPFN requests, there were no maps of the CKC project and associated infrastructure shared during the February 11, 2022, meeting. In Enbridge's view, no Species at Risk were anticipated to be impacted and the archaeological work was complete. Further, it was too late for CKSPFN to become involved on the procurement side of the project. We would like to draw to the OEB and Ministry's attention that the Stage 1 and 2 Archaeological Assessment was not shared by Enbridge until March 7, 2022. This was too late for CKSPFN to include any interrogatories to Enbridge on archaeological matters. Our First Nation has occupied this land since time immemorial. Section 3 of the Archaeological Report describes four locations where artifacts were found, including projectile points. This is not surprising, given the extensive use of the land over time by many First Nations. CKSPFN is left to wonder how many sites relevant to our ancestors went unassessed and therefore unrecognized and lost in history over the past 100 years of oil and gas development across our territory. Enbridge offered capacity funding to support training archaeological monitors on March 10, 2022, nearly a full month after CKSPFN had been told that the CKC archaeological work had been completed. The March 10, 2022, email was also the first response to CKSPFN's Feb 11 meeting minutes and associated action items. These materials arrived a full week after CKSPFN was provided the opportunity to ask Enbridge questions on the OEB record regarding the proposed project.

The following image is that of an email exchange between Lauren Whitwham of Enbridge and two staff members at the Ministry of Energy.

**From:** Lauren Whitwham <Lauren.Whitwham@enbridge.com>

**Sent:** February 11, 2022 11:29 AM

**To:** Ashe, Rosalind (ENERGY) <Rosalind.Ashe@ontario.ca>; Wilkinson, Jonathon (ENERGY) <Jonathon.Wilkinson@ontario.ca>

**Subject:** Conversation with CKSPFN re: 2022 Storage and CKC

**CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.**

Hi there,

I just wanted to provide you with an update on my meeting this morning with CKSPFN. I presented to them on four Enbridge Gas Projects (2022 Storage, CKC, DC and Panhandle).

There were no questions regarding the Storage Enhancement or the CKC projects.

If you have any questions or concerns, please let me know.

Thanks,  
Lauren

CKSPFN must set this record straight. Please note that this email was sent less than one hour after CKSPFN met with Enbridge and with CKSPFN only being provided with the bullet points listed above.



CKSPFN had yet to see the full project application and was not provided with a sense of how the project fit into the larger Enbridge infrastructure, despite requests for that information. There were no questions regarding the Storage Enhancement or the CKC projects, quite simply, because CKSPFN was provided very little information and was not shown any maps as they relate to our treaty territory and the natural features of that territory.

To gain a better understanding of the big picture, CKSPFN's Interrogatory 4.12c<sup>20</sup> made a request that Enbridge, "Please provide a map and access to GIS shapefiles for Enbridge Gas transportation, storage, and distribution assets west of London, Ontario". In the response at page 115 of 141, Enbridge directed CKSPFN to maps of the proposed CKC project, attached a map depicting the general area of the Dawn Storage Hub, and expressed a willingness to engage in further discussions with CKSPFN to assist with CKSPFN's understanding of the Company's infrastructure in and around CKSPFN's treaty territory. Further, in an attachment to Enbridge's March 10, 2022, email to CKSPFN, Enbridge said, "We'd like to set up a meeting to discuss how we can work together to determine the cumulative impacts of Enbridge Gas's ongoing development and operations to CKSPFN's Aboriginal or treaty rights. In addition, we can discuss the funding request for a cumulative impacts study".

**CKSPFN Proposed Conditions of Approval:**

1. The Board require Enbridge to undertake a comprehensive cumulative effects assessment on all historic, current and proposed natural gas infrastructure in CKSPFN treaty lands inclusive of effects on natural heritage at the local and landscape levels, Indigenous cultural landscapes, the climate impacts of greenhouse gas and fugitive emissions, and impacts on Indigenous rights and interests. The goal of the comprehensive cumulative effects assessment will be to advance future natural gas infrastructure planning in the CKSPFN treaty lands based on the principles of rational expansion and rational development outlined in the IPCC Sixth Assessment Report, 2022.
2. Specific to the Coveny Kimball-Colinville well drilling project, the Board require Enbridge to collaborate with CKSPFN on field investigations and mitigation/monitoring plans regarding impacts amphibians, reptiles, and their habitat.
3. The Board require Enbridge to undertake in collaboration with CKSPFN an assessment of all fugitive emissions across its current and proposed natural gas infrastructure in CKSPFN treaty lands, and develop an action plan with specific actions and metrics to meaningfully reduce fugitive emissions with timelines that are consistent with the urgency outlined in the IPCC Sixth Assessment Report, 2022, and reflect the equivalent urgency of protecting ratepayers from significant economic loss from energy resources leaking into the atmosphere.
4. The Board require Enbridge to provide CKSPFN with a map and access to GIS shapefiles for Enbridge Gas transportation, storage, and distribution assets west of London, Ontario

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<sup>20</sup> EB-2021-0248, CKSPFN\_IR\_EGI\_20220302