

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act*,
1998, S.O. 1998, c. 15, Sched. B;

AND IN THE MATTER OF an application by Enbridge
Gas Inc. under section 90 of the OEB Act for an order or
orders granting leave to construct natural gas distribution
pipelines in the City of Toronto.

INTERROGATORIES OF THE CITY OF TORONTO

1. Question: Please confirm that Enbridge will, upon request by Toronto, provide updated alignment sheets for the Project to Toronto.
2. Question: Please confirm that Enbridge will, if requested by Toronto, provide as-built plans of its Project to Toronto.
3. Reference: Application and Evidence EB-2022-0003, Exhibit C, Tab 1, Schedule 1, page 1 of 12

Preamble: Enbridge's "Figure 1: Location of the Project and Preferred Route" and associated text indicates that its proposed temporary bypass and its proposed permanent relocation of its pipeline pass over the mouth of the Don River.

Question: Please confirm that Enbridge will provide, if requested by Toronto complete, site-specific water crossing plans and specifications for the Project.

4. Reference: Application and Evidence 2022-02-24, Exhibit F, Tab 1, Schedule 1, page 5 of 7

Preamble: Enbridge indicates that it will prepare an Environmental Protection Plan for the Project.

Question: Please:

- a. confirm that Enbridge will provide the Project-specific Environmental Protection Plan on request to Toronto;
 - b. if this Environmental Protection Plan has not been completed, confirm when it will be completed, and;
 - c. if it has not been completed, consult with Toronto on its preparation.
5. Reference: Environmental Report, page 72

Preamble: Enbridge's Environmental Report states: "Although rare in occurrence, it is plausible that accidents or emergency events may arise due to an unforeseen chain of events during the project's construction or operational life. Due to the rarity and magnitude of such events, they have not been assessed here, as they are extreme in nature when compared to the effects of normal construction and operation activities and require separate response plans.

Question: Please:

- a. confirm that Enbridge will, on request by Toronto, provide its emergency response plans for the construction and operation of the Project;
 - b. confirm if Enbridge will have an emergency response team available in the event of an emergency in its proposed pipeline, and their response time (accounting for downtown traffic conditions);
 - c. advise if Enbridge will conduct emergency training exercises for the proposed pipeline. If so:
 - i. please describe these exercises, and;
 - ii. will Enbridge share details of, and invite Toronto emergency staff to observe and participate in, these exercises.
6. Question: Please confirm:
- a) the name of the corporate entity(s) that will (1) own and (2) operate Enbridge's proposed pipeline, and;
 - b) if there are multiple corporate entities, their relationship to each other.
7. Question: Please confirm that Enbridge will comply with all Toronto bylaws and obtain all necessary approvals, permits, licences, and certificates required to construct, operate and maintain the Project.