

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

August 23, 2022

**EB-2022-0086 – Dawn to Corunna Replacement Project Leave to Construct  
Pollution Probe Interrogatoires to CAEPLA-DCLC**

Dear Ms. Marconi:

In accordance with Procedural Order No. 4 for the above-noted proceeding, please find attached Interrogatories to the CAEPLA-DCLC.

Respectfully submitted on behalf of Pollution Probe.



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Richard Carlson, Pollution Probe (via: email)

**ONTARIO ENERGY BOARD**

**Enbridge Gas Inc.  
Dawn to Corunna Replacement  
Leave to Construct**

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**POLLUTION PROBE INTERROGATORIES  
To  
CAEPLA-DCLC**

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**August 23, 2022**

**Submitted by: Michael Brophy  
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**Consultant for Pollution Probe**

4-PP-CAPLA-DCLA-1

Is CAEPLA aware of any cases for Enbridge (i.e. legacy Enbridge and Union Gas or affiliates) pipeline projects where Enbridge did not comply with the conditions in the MOU, Environmental Mitigation Plans (e.g. project specific or Construction Manual recommendations), OEB requirements (including project conditions of approval), or recognized best practices? If yes, please provide some contextual examples to illustrate the issue and related impacts.

4-PP-CAPLA-DCLA-2

Please outline any benefits of requiring an independent monitoring report versus one completed by Enbridge or an agent of Enbridge.

5-PP-CAPLA-DCLA-3

Please provide an update on the current status of the MOU (or equivalent such as LOU) between Enbridge and landowners (i.e. CAEPLA members) for the proposed project.

5-PP-CAPLA-DCLA-4

If the MOU (or equivalent such as LOU) has not been executed with all landowners, please provide a best estimate of when/if the MOU will be executed.

5-PP-CAPLA-DCLA-5

Please highlight any benefits of having landowners as part of the decision-making process (e.g. wet soil shutdown) during a project.

5-PP-CAPLA-DCLA-6

Reference: CAEPLA indicates that some sections of the proposed pipeline route will have six Enbridge pipelines located if this project is approved and constructed.

- a) Please provide any commitments Enbridge has made to manage environmental and socio-economic impacts when the pipelines (existing and/or new) are decommissioned and removed.
- b) Please identify any landowner concerns CAEPLA is aware of related to the future decommissioning and removal of the existing and/or proposed pipeline(s).
- c) Once a pipeline is approved by the OEB and constructed by Enbridge (for example, the existing pipelines crossing landowner properties), what recourse does the landowner(s) have to avoid incremental impacts during pipeline decommissioning or removal?