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BY EMAIL

August 23, 2022

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

Dear Ms. Marconi:

**Re: Enbridge Gas Inc.
Dawn to Corunna Replacement Project
OEB Staff Interrogatories on Enbridge Gas's Reply Evidence
Ontario Energy Board File Number: EB-2022-0086**

In accordance with Procedural Order No. 4 please find attached the OEB Staff interrogatories for the above proceeding to Enbridge Gas Inc. on its reply evidence. This document has been sent to Enbridge Gas Inc. and to all other registered parties to this proceeding.

Yours truly,

Ritchie Murray
Sr. Advisor, Applications - Natural Gas

Encl.



OEB Staff Interrogatories

Dawn to Corunna Replacement Project

Enbridge Gas Inc.

EB-2022-0086

August 23, 2022

1-Staff-1

Ref.: Exhibit L, Tab 1, Schedule 1, Page 4

Preamble

Enbridge Gas noted that CAEPLA-DCLC takes issue with the forms of agreements proposed by Enbridge Gas in the current application because, in CAEPLA-DCLC's words, "...Enbridge has replaced the term "gross negligence" in the indemnity clause with "negligence", seeking to reduce the indemnity protection afforded to landowners."

Questions

- a) What is the difference between negligence and gross negligence?
- b) Is Enbridge Gas aware of any instances in which the difference between negligence and gross negligence made a difference in the indemnity afforded a landowner? If so, please briefly describe the circumstances of each instance.