

October 4, 2022

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

Dear Ms. Marconi:

**Re: Enbridge Gas Inc.
Renewal of Franchise Agreement with the Town of Huntsville
Ontario Energy Board File No. EB-2022-0233**

Further to questions submitted by Ontario Energy Board Staff related to the above-noted application, Enbridge Gas provides the following response.

Staff Question-1

Reference: (i) Application, paragraphs 3-5, 14

Preamble:

Enbridge Gas applied for an order of the OEB canceling and superseding its existing certificates of public convenience and necessity (certificates) for the former Town of Huntsville and the former Township of Chaffey and replacing them with a new certificate to construct works to supply gas in the Town of Huntsville. Enbridge Gas states that its certificate request changes the area currently covered by its existing certificates to include areas where it has existing and planned infrastructure.

Enbridge Gas states that the Town of Huntsville was formed on January 1, 1971, through the amalgamation of the former Town of Huntsville, the former Village of Port Sydney, the former Township of Brunel, the former Township of Chaffey, the former Township of Stisted, and the former Township of Stephenson.

Enbridge Gas currently has an existing certificate for the former Town of Huntsville¹, dated February 14, 1958, and for the former Township of Chaffey², dated June 24, 1958.

Questions:

- a) Please confirm if Enbridge Gas is seeking additional service area that is not covered by its existing certificates as part of its request for a new certificate to construct works to supply gas in the Town of Huntsville.

If Enbridge Gas is seeking additional service area in the Town of Huntsville not covered by any of its existing certificates, please describe the proposed additional service area (using

¹ FBC 170

² FBC 255

metes and bounds or some other suitable method) and file a legible map illustrating the proposed additional and existing service area. Please also provide an explanation on the need for any additional service area in the Town of Huntsville. To support your response, please illustrate where Enbridge Gas has existing and planned infrastructure in the proposed additional service area.

Response:

- a) Confirmed. As is indicated in the application (paragraph 5), the request for a new Certificate of Public Convenience and Necessity (CPCN) to cover all of the Town of Huntsville changes the area currently covered by CPCNs issued for two of the former municipalities to include all of the current municipality to ensure that the CPCN covers all areas in which Enbridge Gas has existing and planned infrastructure.

As shown on the customer density map included in the application (Schedule A), Enbridge Gas currently has infrastructure in place in each of the former municipalities that now make up the current Town of Huntsville.

As can be seen in the map and descriptions submitted confidentially under separate cover, the vast majority of the current Enbridge Gas' distribution system within the Town of Huntsville follows the route of the TransCanada Pipeline through the municipality, with significant development in the southern parts of the former Township of Chaffey. General system expansion projects are all driven by organic growth and customer applications so it is difficult to pinpoint which parts of the municipality will be developed and when.

As part of Phase 2 of the Natural Gas Expansion Program, the Government of Ontario has provided funding assistance up to \$1,899,859 for a project to expand the gas distribution system within the Township of Huntsville to include areas in and around the community of Hidden Valley (in the former Township of Chaffey).³ Construction of this service expansion project is expected to be initiated in 2023.

Enbridge Gas is currently reviewing multiple requests for service to individual residences and multi-unit subdivisions in various parts of the Town of Huntsville.

Given the location of the Town of Huntsville in the District Municipality of Muskoka, there are no other gas distribution companies in the area. As noted in the application, Enbridge Gas has franchise agreements with and CPCNs for the District Municipality of Muskoka, the Town of Bracebridge, the Municipality of McMurrich / Monteith and the Township of Perry which are immediately adjacent to the Town of Huntsville. Not having a CPCN that covers the whole Town of Huntsville would unnecessarily delay responding to requests for natural gas service in currently unserved areas of the municipality.

As is noted in the Natural Gas Facilities Handbook⁴, if a CPCN has been issued for a particular area in which there is currently no gas distribution service, another person may apply for a CPCN to serve that area. Granting a CPCN to Enbridge Gas for all of the Town of Huntsville does not prevent another distributor from proposing to provide service in an unserved area, but it would avoid delays to Enbridge Gas in providing requested service caused by the need to apply for CPCN amendments.

³ Ontario Regulation 451/21

⁴ Natural Gas Facilities Handbook, page 14

In accordance with the OEB's *Practice Direction on Confidential Filings*, Enbridge Gas is requesting confidential treatment of the map that will be provided under separate cover. Public disclosure of specific locations of existing and proposed gas distribution and transmission facilities poses both a safety and a security risk. Public access to this kind of information may allow third parties to determine gas system configurations and points of sensitivity or vulnerability that may expose Enbridge Gas to security risks. Further, persons planning developments or excavation projects may attempt to use the facilities information obtained from other sources in substitution for required facilities locates, notwithstanding the fact that obtaining locates is required by law.

Should you have any questions on this submission, please do not hesitate to contact me.

Yours truly,

Patrick McMahon
Technical Manager
Regulatory Research and Records
patrick.mcmahon@enbridge.com
(519) 436-5325