Enbridge Gas Inc.
50 Keil Drive North
Chatham, Ontario, Canada
N7M 5M1

November 10, 2022

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

Dear Ms. Marconi:

Re: Enbridge Gas Inc.
Application for Renewal of Franchise Agreement - Municipality of Leamington
Ontario Energy Board File No. EB-2022-0201

Pursuant to Procedural Order No. 1 dated September 8, 2022, attached are Enbridge Gas' information requests with respect to the evidence submitted November 8, 2022 by the Municipality of Leamington.

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

Yours truly,

Patrick McMahon
Digitally signed by Patrick McMahon
Date: 2022.11.10 15:26:42 -05'00'

Patrick McMahon
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cc (by email): Matthew Todd, Municipality of Leamington (mtodd@leamington.ca)
Brenda Percy, Municipality of Leamington (clerks@leamington.ca)

Encl.

ENBRIDGE GAS INC.
INFORMATION REQUESTS TO MUNICIPALITY OF LEAMINGTON

1. ***Reference***: Leamington Evidence, paragraphs 5, 6 and 7

   "5. The drainage systems in the Municipality are unique.

   6. The Municipality, like much of Essex County, is very flat. There is little topographic relief. Outside of the Municipality and Essex County, the land topography has a rolling landscape with ample drainage to provide sufficient drainage for lands and roads.

   7. In addition to having very flat topography, Leamington also has a large majority of its municipal drains along roadways and within the right of way. With drains being located in the right of way and along roadways, it creates conflicts with various utilities including gas."

   Reference: EB-2022-0201 - Exhibit B.Leamington.5

   "Enbridge Gas does not have nor do we request specific information about the drainage systems operated within the over 300 municipalities in which Enbridge Gas operates with which to compare each one against the others. Enbridge Gas assumes that each municipality has established and governs its own drainage system pursuant to applicable legislation. Enbridge Gas assumes that larger municipalities (both in population and land area) would have larger and more complicated drainage systems."

   Questions:
   a) Please provide evidence related to the drainage systems of the other municipalities within the County of Essex (the Municipality of Lakeshore, the Town of LaSalle, the Town of Tecumseh, the Town of Amherstburg, the Town of Kingsville and the Town of Essex) to justify labelling the drainage systems within the Municipality of Leamington as unique.
   b) Please provide evidence related to the drainage systems of any of the other over 300 municipalities in which Enbridge Gas operates to justify labelling the Leamington drainage systems as unique.
   c) Is the Municipality of Leamington aware of any other municipality having drainage systems along roadways and within utility rights of way?
   d) Please identify the specifics of conflicts with various utilities that have been caused by having drains located in rights-of-way and along roadways. Please include specifics (dates, issues, correspondence, etc.) of the conflicts that have arisen with Enbridge Gas' operations caused by having drains located in rights-of-way and along roadways.

2. ***Reference***: Leamington Evidence, paragraph 9

   "9. Further complicating the Municipality's drainage system is the fact that a portion of the Municipality (located in the South East) is approximately 1.79 meters below sea level. As such, the Municipality has to employ the use of 10 pump stations. These 10 pump stations contain a total of 7 electric powered pumps and 7 diesel powered pumps, which range in size from 24" to 48". These pump stations are necessary to drain approximately 22.8 square km's of the Municipality."

   Reference: Ontario Topographic Map (Ontario topographic map, elevation, terrain (topographic-map.com)) indicates that Lake Erie and Point Pele are 174 m above sea level.

   Question:
   Please provide evidence showing that portions of the Municipality of Leamington are located below sea level.