

April 16, 2024

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 Approval of Franchise Agreement and New CPCN
Township of Puslinch
Ontario Energy Board File No. EB-2024-0106**

Further to the questions submitted by Ontario Energy Board Staff related to the existing certificates of public convenience and necessity (CPCNs), Enbridge Gas provides the following response.

Reference: EB-2024-0106, Application and Evidence, page 3

Preamble:

Enbridge Gas has certificates for the Township of Puslinch (F.B.C. 99) dated June 12, 1957, and (F.B.C. 332) dated November 18, 1959. OEB Staff notes F.B.C. 99 was issued for a pipeline project and spans over multiple geographic areas.

Questions:

- a) Please explain whether F.B.C. 99 currently covers any geographic areas other than the Township of Puslinch. If yes, please confirm if there are existing certificates for those geographic areas.
- b) Please clarify whether F.B.C. 332 can be cancelled or if it should still be in effect.

Response:

- a) F.B.C. 99 was issued primarily to allow for the construction of a Dawn-Trafalgar transmission pipeline and included branch pipelines going to several municipalities. Based on a review of certificates of public convenience and necessity (CPCNs) issued over the last several years, it appears that F.B.C. 99 now really only covers the 26" transmission pipeline as well as the branch pipelines within the Township of Puslinch.

Following is a summary of the CPCNs associated with the municipalities referenced in F.B.C. 99.

Township of Dawn

The Township of Dawn-Euphemia was formed in 2001 from a merger of the former Township of Dawn and former Township of Euphemia. In EB-2009-0305, Union Gas received a new CPCN for the Township of Dawn-Euphemia. There is no mention of cancelling those parts of F.B.C. 99 associated with the former Township of Dawn, so, technically, F.B.C. 99 still applies to parts of the Township of Dawn-Euphemia, but it isn't necessary to continue having it in place for the Township of Dawn-Euphemia.

Township of Trafalgar

In 1962, the former Township of Trafalgar was amalgamated into the new Town of Oakville. On June 10, 1965, Union Gas was awarded a CPCN (E.B.C. 32) granting Union Gas the right to construct works to supply natural gas within the Town of Oakville and 13 other municipalities. There is no mention of cancelling those parts of F.B.C. 99 associated with Trafalgar in the E.B.C. 32 decision, so, technically, F.B.C. 99 still applies to parts of the Town of Oakville, but it isn't necessary to continue having it in place for the Town of Oakville.

Township of Caradoc

On January 1, 2001, the former Town of Strathroy and the former Township of Caradoc were amalgamated to form the Municipality of Strathroy-Caradoc. In EB-2009-0169, Union Gas received a new CPCN for the Municipality of Strathroy-Caradoc. This new CPCN replaced the CPCN that had been in place for the former Town of Strathroy (F.B.C. 112 issued on June 25, 1957) and for the former Township of Caradoc (F.B.C. 192 issued on January 8, 1958 and which covered 29 communities). There is no evidence that the decisions and orders issued related to EB-2009-0169, F.B.C. 112 and F.B.C. 192 made any reference to replacing those parts of F.B.C. 99 related to the former Township of Caradoc so, technically, F.B.C. 99 appears to still apply to at least parts of the Municipality of Strathroy-Caradoc, but it isn't necessary to continue having it in place for the Municipality of Strathroy-Caradoc.

Township of London

Between the 1960s and 1993, the City of London annexed significant sections of the former Township of London and the former Township of Westminster. In particular, between 1989 and 1993, parts of the former Town of Westminster, and the former Townships of Delaware, London, North Dorchester and West Nissouri were annexed by the City of London.

In its Decision in EB-2009-0068, the OEB issued a new CPCN for the City of London. As part of that Decision, parts of the existing CPCNs related to the areas of former municipalities annexed by the City of London were superseded by the new CPCN. This included parts of the former Township of West Nissouri which was included in F.B.C. 99.

Township of West Nissouri

On January 1, 2001, the former Townships of West Nissouri and North Dorchester were amalgamated to form the Municipality of Thames Centre. In EB-2009-0034, Union Gas was granted a new CPCN for the Municipality of Thames Centre which cancelled the parts of F.B.C. 99 pertaining to the former Township of West Nissouri.

Township of Blanshard and Township of Downie

The former Townships of Blanshard and Downie were amalgamated on January 1, 1998 to form the Township of Perth South. In RP-2003-0041 / EB-2003-0051, Union Gas was granted a new CPCN to replace F.B.C. 192, which covered the former Townships of Blanshard and Downie and F.B.C. 230 which pertained to the former Township of Downie. There was no reference to F.B.C. 99 in either the application or the Decision in RP-2003-0041 / EB-2003-0051, but it can be assumed that that parts of F.B.C. 99 dealing with the former Township of Blanshard and the former Township of Downie are no longer required.

Township of West Zorra

On January 1, 1975, the former Township of West Zorra was merged with the former Township of East Nissouri, the former Village of Embro and a portion of the former Township of North Oxford to form the new Township of Zorra. In EB-2007-0025, Union Gas was granted a CPCN to replace the portions of the CPCNs associated with the former townships now within the Township of Zorra including those parts of F.B.C. 99 dealing with the Township of West Zorra.

Township of North Dumfries and Township of Beverly

In 1973, a portion of the former Township of Beverly and portions of the former Township of North Dumfries were annexed to the Village of Ayr to establish the Township of North Dumfries. In EB-2022-0172, Enbridge Gas applied for a new CPCN to cancel and supersede parts of E.B.C. 72 (former Village of Ayr), F.B.C. 259 (former Township of North Dumfries and former Township of Beverly) and F.B.C. 192 (former Township of North Dumfries). This was granted by the OEB in its Decision and Order. There was no mention of F.B.C. 99 in either the application or Decision in EB-2022-0172 so, technically, F.B.C. 99 still applies to the parts of the Township of North Dumfries, but it isn't necessary to continue having it in place for the Township of North Dumfries.

Township of Guelph

The Township of Guelph/Eramosa was formed on January 1, 1999 through the amalgamation of the former Township of Guelph and the former Township of Eramosa. In its 2007 application for a new CPCN, Union Gas noted that the former Township of Guelph had three existing certificates (F.B.C. 99, F.B.C. 110 and F.B.C. 192). In its Decision (EB-2007-0021) granting a new CPCN, the OEB cancelled the portions of the CPCNs (F.B.C. 99, F.B.C. 110 and F.B.C. 192) associated with the former Township of Guelph.

Township of West Flamborough and Township of East Flamborough

In 1958, part of the former Township of East Flamborough was annexed to the then Town of Burlington. In 1973, a portion of the former Township of Beverly and portions of the former Township of North Dumfries were annexed to the Village of Ayr to establish the Township of North Dumfries. In 1974, the former Township of West Flamborough and portions of the former Townships of Beverly and East Flamborough were absorbed into the Township of Flamborough.

The Township of Flamborough became a town in 1985 and in 2001, the Town of Flamborough became part of the City of Hamilton. In EB-2006-0284, Union Gas was granted a new CPCN for the City of Hamilton. In its Decision, the OEB cancelled the section of F.B.C. 99 related to the former Town of Flamborough.

Former Municipality Included Under FBC 99	Current Municipality	Most recent CPCN for Current Municipality
Township of Dawn	Township of Dawn-Euphemia	EB-2009-0305
Township of Trafalgar	Town of Oakville	EBC 32
Township of Caradoc	Municipality of Strathroy-Caradoc	EB-2009-0169
Township of London	City of London	EB-2009-0068
Township of West Nissouri	Municipality of Thames Centre	EB-2017-0108-A5
Township of Blanshard	Township of Perth South	RP-2003-0041 / EB-2003-0051
Township of West Zorra	Township of Zorra	EB-2007-0025
Township of Downie	Township of Perth South	RP-2003-0041 / EB-2003-0051
Township of North Dumfries	Township of North Dumfries City of Cambridge	EB-2022-0172 EB-2017-0107
Township of Waterloo	City of Waterloo City of Cambridge City of Kitchener Township of Woolwich	FBC 167; EBC 3 EB-2017-0107 EB-2015-0296 FBC 338; FBC 340
Township of Beverly	City of Hamilton Township of North Dumfries	EB-2006-0284 EB-2022-0172
Township of Puslinch	Township of Puslinch	FBC 99
Township of Guelph	Township of Guelph/Eramosa	EB-2007-0021
Township of East Flamborough	City of Hamilton City of Burlington	EB-2006-0284 EB-2010-0052
Township of West Flamborough	City of Hamilton	EB-2006-0284

- b) Yes, FBC 332 can be cancelled and superseded by a new CPCN for the Township of Puslinch.

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

Yours truly,

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