



Enbridge Gas Inc.

**Application for leave to construct natural gas pipelines
in the City of Ottawa**

DECISION ON CONFIDENTIALITY

October 16, 2024

Enbridge Gas Inc. (Enbridge Gas) applied to the Ontario Energy Board (OEB) on June 17, 2024, under sections 90 and 97 of the *Ontario Energy Board Act, 1998* (OEB Act), for an order granting leave to construct approximately 17.6 kilometers of natural gas pipeline and associated facilities along St. Laurent Boulevard, Sandridge Road and Tremblay Road in the City of Ottawa. The proposed natural gas pipeline is intended to address significant consequences to safety and operational reliability on the St. Laurent Pipeline System.

The OEB issued the Notice of Hearing on July 12, 2024. The OEB has issued two procedural orders to date. In accordance with the procedural schedule, parties filed interrogatories on Enbridge Gas's evidence on September 9, 2024. Enbridge Gas filed responses to interrogatories on September 27, 2024, and requested confidential treatment of certain responses.

Request for Confidential Treatment of Certain Interrogatory Responses

In its September 27th letter, Enbridge Gas requested that the redacted information contained in its responses to certain interrogatories be granted confidential treatment. Enbridge Gas's letter and a table listing the interrogatory responses subject to the request, and the corresponding grounds for confidential treatment of the subject information, are provided in Schedule 1 of this decision. With one exception, the requests pertained to information presumptively considered confidential in the OEB's *Practice Direction on Confidential Filings* (Practice Direction) – either because it is customer information that would disclose load profiles, energy usage and billing information of a specific customer that is not personal information and the applicable customers have not consented to its disclosure; or because the information, contained in third party consulting agreements, is task-specific pricing information that contains billing rates and/or unit pricing. The one exception to the above two categories is

information contained in Enbridge Gas's response to interrogatory 1.1 CAFES Ottawa – 12, which contains landowner names, addresses and phone numbers. Enbridge Gas submitted that this is personal information and should not be disclosed to parties to the proceeding, in accordance with the *Freedom of Information and Protection of Privacy Act* (FIPPA) and section 10 of the Practice Direction.

No parties filed submissions within 5 business days of Enbridge Gas's request.

Findings

The OEB has considered the confidentiality requests in accordance with the OEB Practice Direction on Confidential Filings. The OEB approves Enbridge Gas's confidentiality requests related to its interrogatory responses filed on September 27, 2024, listed in Schedule 1 to this decision.

Regarding Enbridge Gas's request related to its response to interrogatory 1.1 CAFES Ottawa - 12, the redacted information cannot be disclosed to any party as the OEB finds the information to be personal information protected by FIPPA.

With the exception of the information redacted from Enbridge Gas's response to interrogatory 1.1 CAFES Ottawa – 12, Enbridge Gas shall make the redacted information available to those representatives of the parties that sign the OEB's form of Declaration and Undertaking pursuant to the Practice Direction.

THE ONTARIO ENERGY BOARD ORDERS:

1. Enbridge Gas's request for the confidential treatment of the information contained in its responses to interrogatories listed in Schedule 1 of this decision is granted. With the exception of the response to interrogatory 1.1 CAFES Ottawa – 12, the redacted information in these interrogatory responses shall only be provided to individuals that have signed and filed the OEB's form of Declaration and Undertaking pursuant to the Practice Direction.
2. The redacted information in the response to interrogatory 1.1 CAFES Ottawa – 12 shall not be provided to any party as it is personal information protected by FIPPA.

Parties are responsible for ensuring that any documents they file with the OEB, such as applicant and intervenor evidence, interrogatories and responses to interrogatories or any other type of document, **do not include personal information** (as that phrase is

defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's [Rules of Practice and Procedure](#).

Please quote file number, **EB-2024-0200** for all materials filed and submit them in searchable/unrestricted PDF format with a digital signature through the [OEB's online filing portal](#).

- Filings should clearly state the sender's name, postal address, telephone number and e-mail address.
- Please use the document naming conventions and document submission standards outlined in the [Regulatory Electronic Submission System \(RESS\) Document Guidelines](#) found at the [File documents online page](#) on the OEB's website.
- Parties are encouraged to use RESS. Those who have not yet [set up an account](#), or require assistance using the online filing portal can contact registrar@oeb.ca for assistance.
- Cost claims are filed through the OEB's online filing portal. Please visit the [File documents online page](#) of the OEB's website for more information. All participants shall download a copy of their submitted cost claim and serve it on all required parties as per the [Practice Direction on Cost Awards](#).

All communications should be directed to the attention of the Registrar and be received by end of business, 4:45 p.m., on the required date.

With respect to distribution lists for all electronic correspondence and materials related to this proceeding, parties must include the Case Manager, Zora Crnojacki at Zora.Crnojacki@oeb.ca and OEB Counsel, James Sidlofsky at James.Sidlofsky@oeb.ca.

Email: registrar@oeb.ca

Tel: 1-877-632-2727 (Toll free)

DATED at Toronto, **October 16, 2024**

ONTARIO ENERGY BOARD

Nancy Marconi
Registrar

Schedule 1

Enbridge Gas Inc.

EB-2024-0200

Request for Confidential Treatment of Certain Interrogatory Responses



Patricia Squires
Manager
Regulatory Applications – Leave to
Construct
Regulatory Affairs

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Enbridge Gas Inc.
500 Consumers Road
North York, ON
M2J 1P8

September 27, 2024

BY RESS AND EMAIL

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Dear Nancy Marconi:

Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File: EB-2024-0200
St. Laurent Pipeline Replacement Project
Interrogatory Responses

In accordance with the OEB's Procedural Order No. 1 dated August 21, 2024, enclosed please find the interrogatory responses of Enbridge Gas.

In accordance with the OEB's Practice Direction on Confidential Filings, Enbridge Gas is requesting confidential treatment of the following information. Details of the specific confidential information for which confidential treatment is sought are set out in Table 1:

Table 1

Exhibit	Confidential Information Location	Brief Description	Basis for Confidentiality
I.1-CAFES Ottawa-12	Attachment 1 pgs. 1, 2 and 3	Landowner complaint The redacted information is landowner name, address and phone number.	The redactions relate to the names and contact information of property owners. This information should not be disclosed in accordance with the <i>Freedom of Information and Protection of Privacy Act</i> . Pursuant to section 10 of the OEB's <i>Practice Direction on Confidential Filings</i> , such information should not be provided to parties to a proceeding.
I.1-EP-1	pg. 1, part a – c)	Customer Information	Enbridge Gas does not have the written consent of the consumer to disclose the information requested. The OEB's Gas Distribution Access Rule (GDAR) restricts the disclosure of consumer information without the written consent of that consumer, unless specifically authorized by the Board. This is information that the OEB has indicated will be presumptively considered to be confidential – Information that would disclose load profiles, energy usage and billing information of a specific customer that is not personal information ¹
I.1-EP-2	pg. 1, part a – b)	Customer Information	Enbridge Gas does not have the written consent of the consumer to disclose the information requested. The OEB's Gas Distribution Access Rule (GDAR) restricts the disclosure of consumer information without the written consent of that consumer, unless specifically authorized by the Board. This is information that the OEB has indicated will be presumptively considered to be confidential – Information that would disclose load profiles, energy usage and billing information of a specific customer that is not personal information
I.2-EP-5	pg. 2, part b – d)	Customer Information	Enbridge Gas does not have the written consent of the consumer to disclose the information requested. The OEB's Gas Distribution Access Rule (GDAR) restricts the disclosure of consumer information without the written consent of that consumer, unless specifically authorized by the Board. This is information that the OEB has indicated will be presumptively considered to be confidential – Information that would disclose load profiles, energy usage and billing information of a specific customer that is not personal information

I.1-FRPO-20	pg. 3, part b)	Asset Location The redacted information is rectifier locations.	The redactions relate to the locations of Enbridge Gas critical infrastructure. Public disclosure poses both a safety and a security risk as it may allow third parties to determine gas system configurations and points of sensitivity or vulnerability that may expose Enbridge Gas to security risks.
I.2-FRPO-22	Attachment 1	System Map The redacted information is the existing system map with pipeline MOP and station locations.	The redactions relate to the locations of Enbridge Gas critical infrastructure. Public disclosure poses both a safety and a security risk as it may allow third parties to determine gas system configurations and points of sensitivity or vulnerability that may expose Enbridge Gas to security risks.
I.2-FRPO-23	pg. 2 - Table 1	Station Inlet Pressure and Flow The redacted information is station numbers and names.	The redactions relate to the locations of Enbridge Gas critical infrastructure. Public disclosure poses both a safety and a security risk as it may allow third parties to determine gas system configurations and points of sensitivity or vulnerability that may expose Enbridge Gas to security risks.
I.2-FRPO-24	pg. 2 – Table 1	Station Inlet Pressure and Flow The redacted information is station numbers and names.	The redactions relate to the locations of Enbridge Gas critical infrastructure. Public disclosure poses both a safety and a security risk as it may allow third parties to determine gas system configurations and points of sensitivity or vulnerability that may expose Enbridge Gas to security risks.
I.2-FRPO-25	pg. 2 – Table 1	Station Inlet Pressure and Flow The redacted information is station numbers and names.	The redactions relate to the locations of Enbridge Gas critical infrastructure. Public disclosure poses both a safety and a security risk as it may allow third parties to determine gas system configurations and points of sensitivity or vulnerability that may expose Enbridge Gas to security risks.
I.1-PP-16	pg. 2, part a)	Asset Location The redacted information is station name and location.	The redactions relate to the locations of Enbridge Gas critical infrastructure. Public disclosure poses both a safety and a security risk as it may allow third parties to determine gas system configurations and points of sensitivity or vulnerability that may expose Enbridge Gas to security risks.
I.1-PP.24	Attachment 3 pg. 1 – Table 1 pg. 2 – Table 2	Scope of Work The redacted information is hourly and task-specific pricing information, and names of team members.	This is information that the OEB has indicated will be presumptively considered to be confidential – Billing rates and/or unit pricing of a third party. ² The vendor requested the names of third party team members be redacted on the basis of personal information and relevance. Team member roles are provided along with the name of the Team Lead.
I.1-PP-24	Attachment 4 pg. 2	Scope of Work The redacted information is pricing information.	This is information that the OEB has indicated will be presumptively considered to be confidential – Billing rates and/or unit pricing of a third party

²These are noted as items #1 and 2 in the “Categories of Information that Will Presumptively Be Considered Confidential”, as found at Appendix B to the OEB’s Practice Direction on Confidential Filings.


I.2-PP-44	Attachment 1, pgs. 12 and 21-23	Consulting Agreement The redacted information is task-specific pricing information.	This is information that the OEB has indicated will be presumptively considered to be confidential – Billing rates and/or unit pricing of a third party
I.2-PP-44	Attachment 2 pg. 3	Consulting Agreement The redacted information is task-specific pricing information.	This is information that the OEB has indicated will be presumptively considered to be confidential – Billing rates and/or unit pricing of a third party
I.2-PP-44	Attachment 3 pg. 3	Consulting Agreement The redacted information is task-specific pricing information.	This is information that the OEB has indicated will be presumptively considered to be confidential – Billing rates and/or unit pricing of a third party
I.2-PP-49	pg. 1, part a – b)	Customer Information	Enbridge Gas does not have the written consent of the consumer to disclose the information requested. The OEB's Gas Distribution Access Rule (GDAR) restricts the disclosure of consumer information without the written consent of that consumer, unless specifically authorized by the Board. This is information that the OEB has indicated will be presumptively considered to be confidential – Information that would disclose load profiles, energy usage and billing information of a specific customer that is not personal information
I.2-PP-53	Attachment 1 pg. 4	Scope of Work The redacted information is hourly and task-specific pricing information.	This is information that the OEB has indicated will be presumptively considered to be confidential – Billing rates and/or unit pricing of a third party

The above noted submission has been filed electronically through the OEB's RESS and will be made available on Enbridge Gas's website. Please see the link below (then navigate to the "Regulatory Information" tab).

<https://www.enbridgegas.com/about-enbridge-gas/projects/st-laurent-pipeline-replacement-project>

If you have any questions, please contact the undersigned.

Sincerely,



Patricia Squires
Manager, Regulatory Applications – Leave to Construct