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Enbridge Gas Inc.
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December 5, 2024

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

Dear Nancy Marconi,

**Re: Enbridge Gas Inc. (“Enbridge Gas” or the “Company”)
Ontario Energy Board (“OEB”) File No. EB-2024-0200
St. Laurent Pipeline Replacement Project**

Enbridge Gas is in receipt of the letter from Pollution Probe (PP) dated December 3, 2024, wherein PP requests that Enbridge Gas produce an early, February 10, 2023 draft of a DNV report “St. Laurent Pipeline Risk Review.”

In its response to the technical conference undertaking request at Exhibit JT2.23, Enbridge Gas declined to produce this draft document on the basis that it is irrelevant, and explained that “DNV generally does not release drafts because they may represent incomplete data or intermediate conclusions.” For reasons briefly summarized below, Enbridge Gas maintains its position that this draft document is irrelevant and would not assist the OEB in its consideration of the issues, and thus declines to produce it in response to PP’s request.

The final “DNV—St. Laurent Pipeline Risk Review Memo (2023)”, on which Enbridge Gas relies in the application, was filed at Exhibit B, Tab 1, Schedule A, Attachment 3. In response to interrogatory Exhibit I.1-PP-24, Enbridge Gas also produced the full DNV report entitled “St. Laurent Pipeline—Risk Review”, and explained that the full report was the basis for the memo that was included in the pre-filed evidence. Enbridge Gas also provided information in response to interrogatories and technical conference questions regarding the process of engaging DNV and its review of the Enbridge Gas risk assessment.

DNV’s final risk review memo and its full report are the relevant reports setting out the scope of DNV’s review and conclusions. An earlier draft of one of these documents is not relevant and will not add probative information to the record, given that both final documents have been filed. The OEB will be able to consider and assess DNV’s review and its findings based on those final documents. Enbridge Gas also answered questions regarding the discussions it had with DNV and written comments it provided to DNV during the process, including in response to Exhibit I.1-PP-24, so that information is already on the record as well, to the extent it is useful. Further, we understand the earlier draft document may not have related to the final risk assessment report, an additional reason it would be irrelevant.

In the circumstances, Enbridge Gas declines to produce the earlier draft PP is requesting, and is also mindful of DNV’s typical process in respect of not releasing drafts as they may be incomplete. Respectfully, there is no basis for PP’s bald suggestion that this draft document is somehow required “to validate the credibility of the third-party review” conducted by DNV, nor was there any request that DNV appear at the technical conference.

Please advise if the OEB requires any further information or response from Enbridge Gas relating to this request.

Sincerely,

Patricia Squires

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Cc: Zora Crnojacki (OEB Staff)
Charles Keizer (Torys)
Arlen Sternberg (Torys)
Intervenors (EB-2024-0200)