



Ontario  
Energy  
Board | Commission  
de l'énergie  
de l'Ontario

**BY EMAIL**

March 28, 2025

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 to Renew its Franchise Agreement with, and certificate  
for, the City of Guelph  
OEB File Number: EB-2025-0058**

In accordance with Procedural Order No. 1, please find attached Ontario Energy Board (OEB) staff's interrogatories in the above proceeding. The applicant and intervenor have been copied on this filing. Enbridge Gas's responses to interrogatories are due by April 11, 2025.

Any questions relating to this letter should be directed to Natalya Plummer at [natalya.plummer@oeb.ca](mailto:natalya.plummer@oeb.ca) or at 416-440-7654. The OEB's toll-free number is 1-888-632-6273.

Yours truly,

Natalya Plummer  
Advisor

Encl.

**OEB Staff Interrogatories  
Enbridge Gas Inc.  
EB-2025-0058**

Please note, Enbridge Gas Inc. is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff interrogatories and any other supporting documentation, 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*.

**OEB STAFF - 1**

**Reference:** Application, page 3, para 9  
Application, Schedule D1  
Application, Schedule D2

**Preamble:**

The City of Guelph requests an amendment to the Model Franchise Agreement to allow for the City of Guelph to charge fees for the use of public property if Ontario Regulation 584/06 is amended to allow such charges. The City of Guelph also requests an amendment to the Model Franchise Agreement that would ensure that future charges for the use of municipal property are not passed on to Guelph customers of Enbridge Gas.

The City of Guelph's Staff Report included in the application notes that natural gas distributors are subject to the *Assessment Act* and thereby the City of Guelph receives tax revenue from Enbridge Gas. The report also notes that in 2023, the City of Guelph received \$764,730 in taxes based on pipeline assessment.

**Question(s):**

- a) Please provide an update on the status of amendments, or proposed amendments, to Ontario Regulation 584/06 that would relate to allowing the City of Guelph to charge fees for the use of public property.
- b) Please advise if there any requirements in the *Assessment Act* that apply only to natural gas distributors.

## **OEB STAFF - 2**

**Reference:** Application, page 3, para 9  
Application, Schedule D1  
Application, Schedule D2

### **Preamble:**

The City of Guelph requests an amendment to the Model Franchise Agreement to ensure that the City of Guelph is not liable to pay for any gas infrastructure relocations needed due to conflicts with municipal infrastructure.

The City of Guelph's Staff Report on the franchise renewal included in the application states that some of the City of Guelph's identified areas of concern can be managed at the local level through cooperative relationships between the City of Guelph and Enbridge Gas.

### **Question(s):**

- a) Please outline what section(s) of the Model Franchise Agreement would be affected by an amendment that would ensure that the City of Guelph is not liable to pay for gas infrastructure relocations needed due to conflicts with municipal infrastructure. How would the existing terms and conditions of the Model Franchise Agreement change if the City of Guelph is not liable to pay for gas infrastructure relocations needed due to conflicts with municipal infrastructure.
- b) Please discuss the frequency of an occurrence where a pipeline needs to be relocated due to conflicts with municipal infrastructure in the City of Guelph. Please describe whether the number of relocations due to conflicts with municipal infrastructure in the City of Guelph is more than what is typical in other municipalities in Ontario where Enbridge serves customers.
- c) Please explain how Enbridge Gas typically manages the interaction of natural gas infrastructure and underground assets and whether there is a local "Utility Co-ordinating Committee" or similar group or body in the City of Guelph whereby the owners and operators of underground assets and unique linear property assemble to discuss common issues in the City of Guelph.
- d) Please discuss whether Enbridge Gas believes some of the concerns that the City of Guelph has brought forth about the Model Franchise Agreement could be managed through cooperative relationships over the term of the franchise agreement.