



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

April 30, 2025

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

Dear Ms. Marconi:

**Re: Sedum Master Inc.
Application for Approval of Franchise Agreement and Limited CPCN
Township of Blandford-Blenheim
Ontario Energy Board File No. EB-2025-0090**

In accordance with Procedural Order No. 1, attached are Enbridge Gas' interrogatories to Sedum Master Inc. for the above proceeding.

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

Yours truly,

Patrick McMahon
Technical Manager
Regulatory Research and Records
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(519) 436-5325

cc (by email only):

Richard J. King (Osler, Hoskin & Harcourt LLP)
Tom Watkinson (Sedum Master Inc.)
Natalya Plummer, OEB
Richard Lanni, OEB

ENBRIDGE GAS INC.
INTERROGATORIES TO SEDUM MASTER

1. **Reference:** Sedum Master Application, page 2 (Paragraph 5(c))
Sedum Master is seeking “an Order pursuant to section 8 of the MFA issuing a Certificate of Public Convenience and Necessity to construct the Proposed Pipeline and supply gas to the Facility in the Township”.

Reference: Sedum Master Application, Appendix F
“Lot 24, Concession II, Blenheim Township and east along Blenheim Township Road 2 for approximately 4.5 km to Lot 19, Concession II, Blenheim Township, bordered to the west by Gobles Road.”

Questions:

- (a) Please confirm that Sedum Master seeks a geographically limited (i.e., specific lots and concessions) Certificate of Public Convenience and Necessity (CPCN) under section 8(1) of the *Municipal Franchises Act* to construct a pipeline to supply incremental gas to its greenhouse facility located in the community of Princeton within the Township of Blandford-Blenheim.
- (b) Please explain how granting the requested CPCN is in the public interest. Please compare the criteria Sedum Master uses to determine that granting of the requested CPCN is in the public interest to the criteria typically used by the Ontario Energy Board to determine public interest in a leave to construct proceeding (for example, see the [EB-2022-0249 - Decision and Order](#) issued September 21, 2023).
- (c) Please confirm whether Sedum Master has applied for a gas distributor license from the Technical Standards & Safety Authority (TSSA) and provide evidence that Sedum Master is compliant with the TSSA’s [Pipeline Compliance Standard Summary Checklist](#). Please confirm the status of the application and provide proof that the TSSA has granted a license.
- (d) Please explain whether Sedum Master will require other approvals, permits, etc. other than a CPCN, the franchise agreement and the TSSA license to construct and operate the pipeline to provide natural gas to its expanded greenhouse facility. Please provide specific details of the other approvals and when they will be acquired.
- (e) Please confirm whether Sedum Master considers itself to be a utility subject to the [Gas Distribution Access Rule](#) (GDAR) and other regulatory requirements of the Ontario Energy Board.
- (f) Please confirm that Sedum Master will be registering with Ontario One Call as a member pursuant to [Ontario One Call Rules for Members and Excavators](#). Please confirm that Sedum Master understands its Ontario One Call obligations and that it will fulfill these obligations.
- (g) Please provide a detailed map of the Township of Blandford-Blenheim showing an outline of the areas to be covered by Sedum Master’s proposed CPCN and explain how it compares to and will complement the CPCN currently held by Enbridge Gas for the Township of Blandford-Blenheim.
- (h) Please confirm that Sedum Master’s application is considered a bypass of Enbridge Gas’ system.
- (i) Please confirm whether the service proposed to be provided by Sedum Master to its greenhouse facility is firm service or interruptible service or a combination of the two. Please provide details of loads proposed to be provided under each type of service.
- (j) Please confirm Sedum Master’s understanding that section 8 of the *Municipal Franchises Act* relates to constructing works to supply natural gas within a municipality and does not actually give any permissions to sell gas.
- (k) Please confirm whether the existing greenhouse facility will be the only service location to which Sedum Master intends to provide service using the facilities subject of this application. If other service locations are contemplated, please identify the other municipal addresses being considered and when gas service would be provided at these locations.

2. **Reference:** Sedum Master Application, page 1

“3. Heating for the 2021 Expansion has been temporarily supplied using propane. However, the continued use of propane is not appropriate to support the Expansions. As such, and as described further below, Sedum intends to construct a 4.5 km pipeline (the “Proposed Pipeline”) from a nearby EGI delivery station to the Facility for the transmission of natural gas to the Facility.”

Reference: Sedum Master Application, pages 3 - 4

“13. The installation of the Proposed Pipeline will be made using qualified and licenced contractors in accordance with all applicable standards and under the jurisdiction of the Technical Standards and safety Authority. Sedum will contract with qualified companies for the ongoing operation and maintenance, and any other items for which it does not have expertise and qualifications.”

Questions:

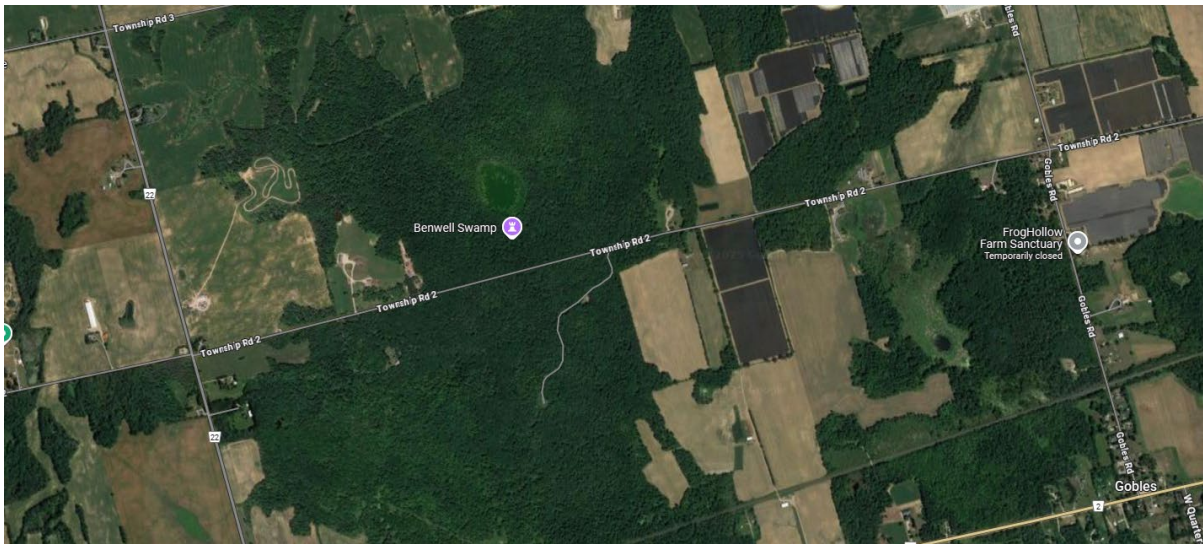
- (a) The attached recent photographs represent Township Road 2 through Benwell Swamp. Please confirm that this is the section of Township Road 2 along which the proposed pipeline will be built.







- (b) Please confirm that the proposed pipeline will be built, at least in part, through an area identified on the attached Google Maps screenshot as the Benwell Swamp.



- (c) Please explain how the proposed project complies with the Ontario Energy Board's [Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Projects and Facilities in Ontario](#).
- (d) Please provide details of any environmental screenings and reviews that have been or will be undertaken related to the proposed pipeline project.

- (e) Please provide details of the experience and qualifications / certifications of the company and individuals that will be building the proposed pipeline and the company and individuals that will be maintaining the pipeline once in operation.
- (f) Please provide details of how the proposed pipeline will be maintained operationally and at a required depth of cover given the proposal to build the pipeline through wetlands area.
- (g) Please provide details of the planned monitoring of the operation of the proposed pipeline.
- (h) Please confirm that none of the options proposed by Enbridge Gas to provide service included building a pipeline through the Benwell Swamp area.
- (i) Please provide details of procurement of the materials needed for the proposed project. For example, the source of the required pipe, whether the specified DR 7 or DR 9 pipe has been acquired, evidence of the integrity of all materials to be used, etc. Please provide details of how the proposed pipeline will be locatable and how you will ensure it can be located after being placed into service.

3. **Reference:** Sedum Master Application, page 3

"8. Discussions and negotiations between Sedum and EGI regarding a delivery station location, delivery pressure and quantities continued, and in late January 2021, Sedum received a proposal from EGI, including an estimated capital cost.

9. Since reaching out in 2018, Sedum has amended the parameters of its natural gas needs to include the 2021 Expansion."

Reference: Sedum Master Application, page 6

"23. Pursuant to subsection 90(1) of the Ontario Energy Board Act, 1998, Sedum is not required to seek leave to construct in order to construct the Project. In particular:

- (a) the Project will not result in the construction of a hydrocarbon line which is more than 20 kilometres in length;*
- (b) the projected cost of the new facilities will not exceed \$2 million; and*
- (c) the Project will have a nominal pipe size of far less than 12 inches and will have an operating pressure of less than 2,000 kilopascals."*

Questions:

- (a) Please provide details of the total costs being incurred as part of this proposed project to supply the natural gas volumes needed by the expanded greenhouse facility.
- (b) Please provide all documentation associated with the quotes provided to Sedum Master by Enbridge Gas for requested service and required infrastructure.
- (c) Please provide details of the natural gas requirements for the expanded greenhouse facility for the next five years.

4. **Reference:** Sedum Master Application, pages 3 - 5

"12. The Proposed Pipeline will be constructed of NPS 3 DR 9 or DR7 PE4710 high density yellow strip ASTM D2513 API 15 LE CSA B137 approved pipe. Most of the Proposed Pipeline will be installed using directional drilling and plowing so as to keep soil disturbance to a minimum."

[...]

"16. The specifics for the Station are as follows:

- (a) Sedum's contribution in aid of construction for the Station is estimated to be \$247,000+HST.*

- (b) *The Station will be constructed within the road allowance of Township Road 2, adjacent to Lot 24, Concession II, Blenheim Township, approximately 200 meters (656') from EGI's Toyota Station.*
- (c) *The Station pressure to be supplied will be 883 kPa or 128 psig.*
- (d) *The Station will be designed with an hourly capacity exceeding 849 m³ per hour (29.9 Mcfh) and a daily capacity of 20,376 m³ (688 Mcf). Should Sedum's needs expand beyond the designed hourly capacity, EGI has advised a heater will be required at a cost of approximately \$100,000.*
- (e) *Subject to the processing of this application, Sedum would make the payment noted in (a) above to EGI by May 14, 2025, which would enable construction of the Station to be completed by October 1, 2025 in accordance with Sedum's needs."*

Questions:

- (a) Please confirm that the proposed polyethylene piping conforms to CSA B137.4 as per the TSSA [Oil and Gas Pipeline Systems Code Adoption Document Amendment](#).
- (b) Please provide confirmation documents showing that the proposed NPS 3 pipeline will safely operate at the required pressure of 128 psig.
- (c) Please describe the joining methods and fittings that will be used to connect sections of the proposed 4.5 km pipeline together.
- (d) Please confirm Sedum Master's understanding that changes to the supply requirements that would require the addition of a heater at the proposed transfer station would result in the transfer station design needing to be reconfigured and its location changed.
- (e) Please explain how Sedum Master will ensure the integrity of the proposed pipeline after installation and before it is placed into service.
- (f) Please confirm what is meant by "an hourly capacity exceeding 849 m³ per hour" when, typically, a transfer station is designed to a certain maximum hourly capacity.

5. **Reference:** Sedum Master Application, Appendix C, Resolution

Questions:

- (a) Please provide a copy of the referenced Report CAO-22-14.
- (b) Please confirm whether, in agreeing to enter into the proposed franchise agreement with Sedum Master, the Township of Blandford-Blenheim considers Sedum Master a gas distributor.
- (c) Please provide copies of all correspondence with and notes from meetings with the Township of Blandford-Blenheim about the proposed project since the municipality's resolution was passed on July 6, 2022.
- (d) Please provide details of any public consultations / open houses held related to the proposed project.
- (e) Please confirm that Sedum Master will be paying property taxes on the assets installed pursuant to the proposed project.

6. **Reference:** Sedum Master Application, Appendices D and E, Proposed Franchise Agreement

Reference: Ontario Energy Board's [Natural Gas Facilities Handbook](#)

Questions:

- (a) Please confirm Sedum Master's understanding that the Ontario Energy Board's Natural Gas Facilities Handbook directs that franchise agreements be based on the Model Franchise Agreement unless there are compelling reasons to deviate from it.

- (b) Please confirm that Sedum Master informed the Township of Blandford-Blenheim that the Ontario Energy Board's Natural Gas Facilities Handbook directs that franchise agreements be based on the Model Franchise Agreement unless there are compelling reasons to deviate from it. Please provide details of when this information was provided to the municipality.
- (c) Please confirm Sedum Master's understanding that the Ontario Energy Board has consistently advised natural gas distributors that they are expected to follow the form of the Model Franchise Agreement when filing applications for the approval of franchise agreements unless there is a compelling reason for deviation.
- (d) Please provide details of the compelling reasons for each of the amendments being proposed by Sedum Master to the Model Franchise Agreement in this application.
- (e) Please provide Sedum Master's opinion on whether the Ontario Energy Board has the authority to impose the unamended terms of the Model Franchise Agreement upon Sedum Master and the Township of Blandford-Blenheim given that this application seeks approval of a franchise agreement under section 9 of the *Municipal Franchises Act*.
- (f) Please confirm whether the Township of Blandford-Blenheim will need to approve a new bylaw if the terms and conditions of the franchise agreement currently forming part of Bylaw 2306-2022 are changed by the Ontario Energy Board to conform to the Model Franchise Agreement (similar to the [franchise agreement currently in place](#) between Enbridge Gas and the Township of Blandford-Blenheim).