



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

July 11, 2025

Mr. Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Mr. Murray:

**Re: Enbridge Gas Inc.
Application for Certificate of Public Convenience and Necessity
Township of Tay Valley
Ontario Energy Board File No. EB-2024-0342**

Pursuant to Procedural Order No. 3, Enbridge Gas hereby submits responses to the information requests submitted by Ontario Energy Board staff and Climate Network Lanark.

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
patrick.mcmahon@enbridge.com
(519) 436-5325

cc: (email only)

Noelle Reeve, Township of Tay Valley
Kent Elson, Elson Advocacy (Climate Network Lanark)
Kate Siemiatycki, Elson Advocacy (Climate Network Lanark)
Natalya Plummer, OEB

ENBRIDGE GAS INC.

Response to Interrogatory from
OEB Staff

Reference: Application, page 1, para 3
 Application, page 2, para 7
 Application, page 3, para 11

Preamble:

The Township of Tay Valley was formed in 1998 through the amalgamation of the former Township of Bathurst, the former Township of South Sherbrooke and the former Township of North Burgess. Enbridge Gas holds a certificate dated August 25, 1960 that covers the geographic area of the former Township of Bathurst. Enbridge Gas does not have certificate rights for the geographic area of the former Township of South Sherbrooke or the former Township of North Burgess. The municipality was originally known as the Township of Bathurst Burgess Sherbrooke, but adopted the name of Township of Tay Valley in 2002. Enbridge Gas requests a new certificate to replace its existing certificate that reflects the Township's current name and boundaries. If approved, the certificate request would expand Enbridge Gas's certificate rights in the Township of Tay Valley.

Questions:

- a) Please confirm that the proposed certificate does not overlap with any other person's certificate. If there is an overlap, please provide a description of the location and extent of the overlap.
- b) Please discuss whether Enbridge Gas has any natural gas infrastructure in the geographic area of the former Township of South Sherbrooke or the former Township of North Burgess.

Response:

- a) Confirmed. As noted in the Application at paragraph 7, Enbridge Gas is not aware of any other person holding a CPCN for any part of the current Township of Tay Valley.
- b) As noted in the Application at paragraph 7, Enbridge Gas does not hold the CPCN rights for the former Township of South Sherbrooke and the former Township of North Burgess. As a result, Enbridge Gas does not have any natural gas infrastructure in these geographical areas.

ENBRIDGE GAS INC.

Response to Interrogatory from
OEB Staff

Reference: Application, page 1, para 2

Preamble:

Enbridge Gas states that it has been providing gas distribution services in the geographic area of the Township of Tay Valley since 1959 and that it serves approximately 30 customers.

Questions:

- a) Please discuss whether there are any pending requests for service attachments in, and if there any planned natural gas infrastructure expansion projects for, the Township of Tay Valley. If there are pending service requests or plans for infrastructure expansion, please provide the following:
- i. The total number and general location of any prospective customers.
 - ii. A map showing the location of any service requests or planned infrastructure.
 - iii. The proposed in-service date of planned infrastructure.
 - iv. Please discuss whether any planned infrastructure would require a leave to construct application or whether the planned infrastructure would be exempt from the leave to construct threshold.
 - v. Please discuss, for any planned or any future infrastructure, other types of permits and authorizations that Enbridge Gas would be required to secure beyond those involving the OEB. Please include any such authorizations where the municipality is either involved (including the extent of its involvement) and/or has authority to grant/deny such authorizations.

Response:

- a) On June 9, 2021, the Ministry of Energy, Northern Development and Mines announced which projects would receive financial assistance through Phase 2 of the Natural Gas Expansion Program (NGEP). One of the projects that received NGEP financial assistance will provide access to natural gas distribution service in the community of Lanark within the Township of Lanark Highlands and in the community of Balderson within the Township of Drummond / North Elmsley.
- i – iii While the scope of the Lanark / Balderson community expansion project is still under review, the proposed project currently includes some pipe being installed within the Township of Tay Valley that could potentially provide access to natural gas to residential, commercial and agricultural service locations. There are also potential customers along the west side of a proposed supply pipeline for the Lanark

- / Balderson community expansion project along Highway 511 that would be located with the Township of Tay Valley.
- iv. The proposed Lanark / Balderson community expansion project will require a leave to construct application.
 - v. Pipe currently proposed to be constructed within the Township of Tay Valley as part of the Lanark / Balderson community expansion project is expected to be constructed along roads under the jurisdiction of the County of Lanark so the requirement to receive authorization from the Township of Tay Valley may be limited.

The draft Environmental Report completed for the proposed Lanark / Balderson community expansion project identifies potential environmental permits and approvals:

- a. *Species at Risk Act* (SARA) (2002) (amended in February 2023) permit from Fisheries and Oceans Canada (aquatic species) and Environment and Climate Change Canada (terrestrial species). Permits are required by those persons conducting activities that may affect species listed on Schedule 1 of the SARA as extirpated, endangered, or threatened and which contravene the Act's general or critical habitat prohibitions in watercourses (aquatic species) or on federal lands (terrestrial species).
- b. Environmental Activity and Sector Registry (EASR) (surface and groundwater) under the *Ontario Water Resources Act* (1990) (amended in June 2021) from the Ministry of the Environment, Conservation and Parks (MECP). MECP requires an EASR for dewatering between 50,000 and 400,000 L/day.
- c. Archaeological acceptance under the *Ontario Heritage Act* (OHA) (amended in January 2023) from the Ministry of Citizenship and Multiculturalism (MCM). Archaeological assessments are required for areas of archaeological potential.
- d. Review of Built Heritage and Cultural Heritage Landscapes under the OHA from the MCM.
- e. Permitting or registration under the *Endangered Species Act* (ESA) (2007) (amended in October 2021) from the MECP. An ESA permit or registration is required for activities that could impact species under the ESA.
- f. Development permits under the *Conservation Authorities Act* from the Mississippi Valley Conservation Authority and Rideau Valley Conservation Authority. Development permits are required for works within Conservation Authority regulated areas.
- g. Work in Right-of-Way Permit from the County of Lanark for construction work in the Right-of-Way in the County of Lanark.
- h. Tree Conservation By-Law permit from the County of Lanark required for injury, removal or destroyed woodlots that are two hectares or more in an individual Roll Number.

ENBRIDGE GAS INC.

Response to Interrogatory from
OEB Staff

Reference: Application, page 1, para 5

Preamble:

Enbridge Gas has a franchise agreement with the Township of Tay Valley that was effective June 27, 2006.¹ The amalgamation that created the Township of Tay Valley occurred in 1998.

Question:

- a) Please advise to what extent there is urgency to securing a revised certificate given the stand alone filing of this application in advance of the franchise renewal application.
-

Response:

- a) According to the *Natural Gas Facilities Handbook*, if the boundaries of a person's existing CPCN are affected by a municipal amalgamation or annexation, and no other person holds a CPCN for any part of the newly amalgamated or annexed municipal territories, then the person should notify the OEB within 90 days of the date that the change takes effect to have the CPCN amended to reflect the change.² As part of an ongoing effort to bring all CPCNs in line with the *Natural Gas Facilities Handbook* and the OEB's decisions over the last few years to match CPCNs to municipal boundaries, Enbridge Gas submitted this application in November 2024. The franchise agreement renewal application is not expected to be submitted until Q2 2026.

While the Township of Tay Valley is a predominantly rural location, not having a CPCN that covers the whole Township of Tay Valley would unnecessarily delay responding to requests for natural gas service in currently unserved areas of the municipality. This is especially true for residents and businesses that may be in proximity to the various pipelines being constructed related to the proposed Lanark / Balderson community expansion project.

As is noted in the *Natural Gas Facilities Handbook*³, if a CPCN has been issued for a particular area in which there is currently no gas distribution service, another person may apply for a CPCN to serve that area. Granting a CPCN to Enbridge Gas for all of the Township of Tay Valley does not prevent another distributor from proposing to provide service in an unserved area, but it would avoid delays to Enbridge Gas in providing requested service caused by the need to apply for CPCN amendments.

¹ [EB-2006-0028](#)

² [Natural Gas Facilities Handbook](#), section 3.6.2

³ [Natural Gas Facilities Handbook](#), page 14

ENBRIDGE GAS INC.

Response to Interrogatory from
Climate Network Lanark

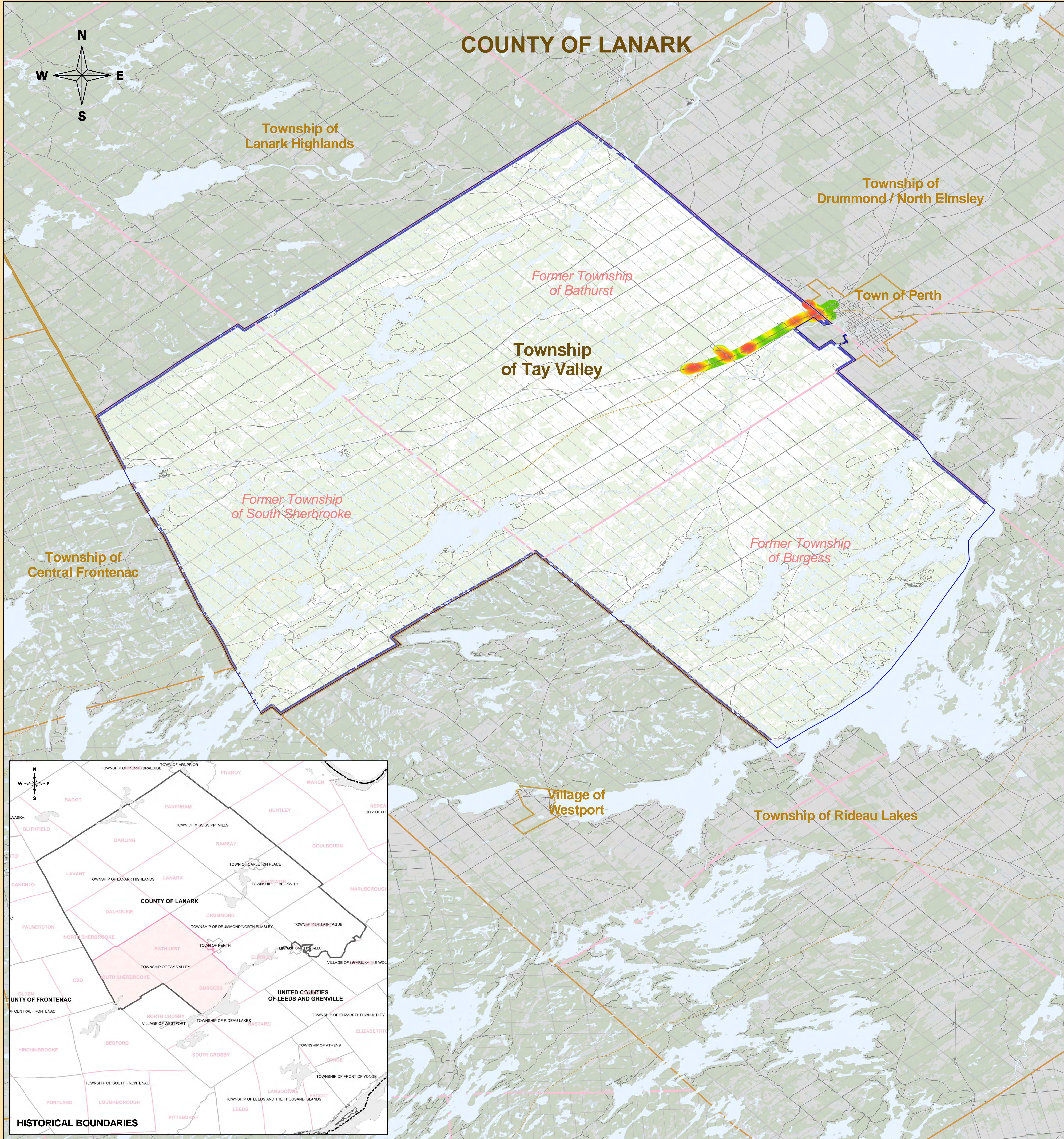
Questions:

- a) Please provide a map showing (i) the area in which Enbridge currently has approval to construct gas works in Tay Valley Township and (ii) the expanded area in which Enbridge would be granted approval to construct gas works in Tay Valley Township pursuant to its application.
 - b) Please provide another version of the map from (a) showing (i) the current Enbridge gas pipelines and (ii) any planned Enbridge gas pipelines in or around those areas.
 - c) Please describe and provide a timeline regarding any pipelines that Enbridge anticipates constructing within the expanded area it is seeking approval to construct gas works in via this application.
-

Response:

- a) As noted in the Application, Enbridge Gas has a CPCN issued by the Ontario Fuel Board dated August 25, 1960 (F.B.C. 316) for the former Township of Bathurst. The current Township of Tay Valley also includes the former Township of South Sherbrooke and the former Township of North Burgess. Please see Attachment 1.
- b) Please refer to Schedule A of the application for the location of Enbridge Gas' infrastructure within the Township of Tay Valley. Please also refer to the response at Exhibit EGI-Staff-2.
- c) The Application is not being brought in respect of any specific approval to construct works. As noted by the OEB in Procedural Order No. 2, Enbridge Gas has submitted a request to approve a new CPCN for the Township of Tay Valley to align the existing CPCN with current municipal boundaries in accordance with the direction from the OEB as described in section 3.6.2 of the *Natural Gas Facilities Handbook*.

There are currently no plans in place related to constructing pipelines in the areas being added to Enbridge Gas' current CPCN.



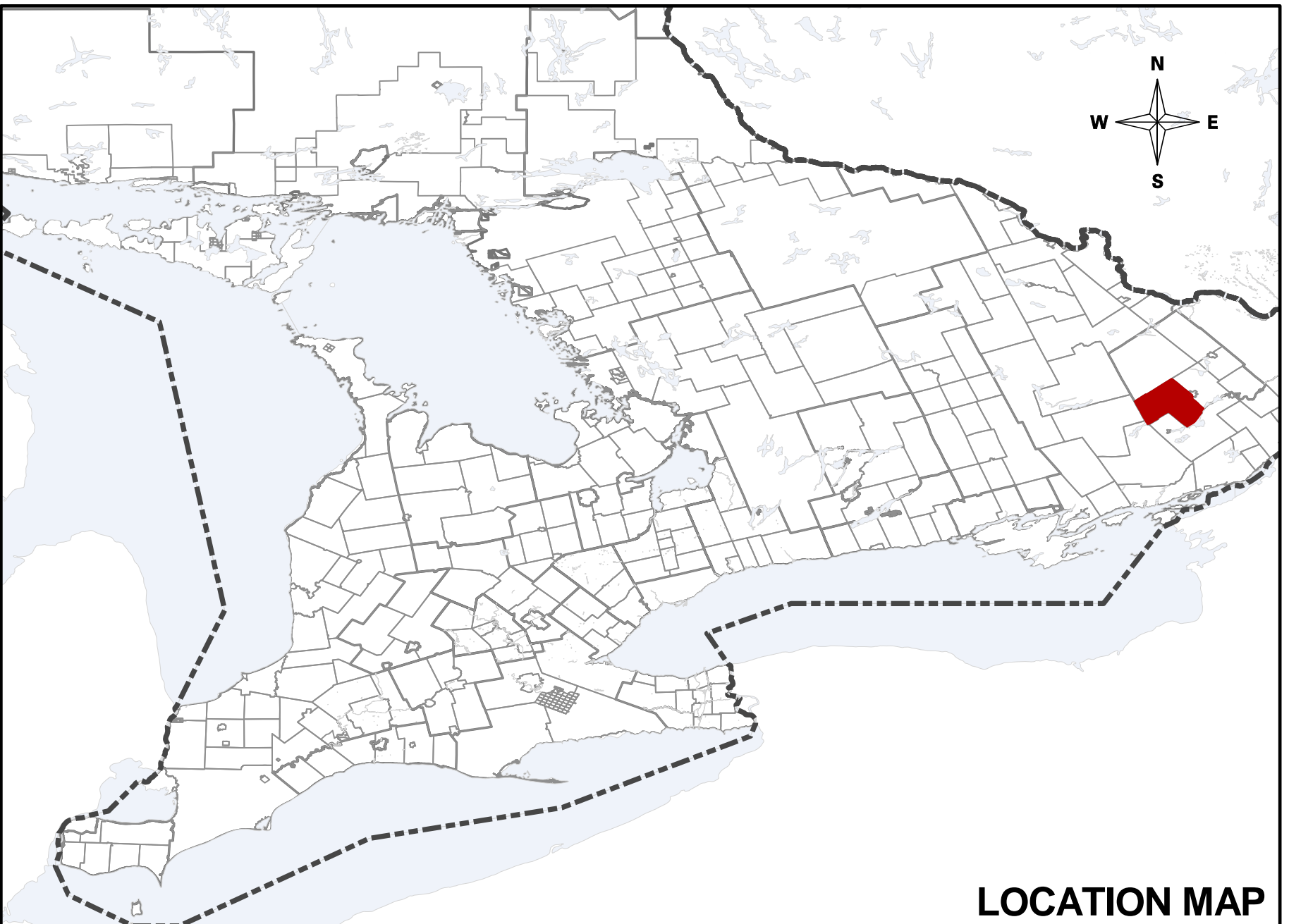
- Legend**
- Enbridge Gas Pipeline Coverage Area
 - Township or Tay Valley
 - Roads
 - Railways
 - Historical Township Boundaries
 - Municipal and Township Boundaries
 - Indigenous Lands
 - Wooded Areas

Township of Tay Valley



The location of Enbridge Gas facilities on the following drawing is approximate and is to be used for information purposes only. Enbridge Gas re-affirms that this drawing should not be relied upon to determine the location of any Enbridge Gas' facilities, exact locates can be determined by calling Ontario One Call 1-800-400-2255

This document is to be used for viewing purposes only. It shall not guarantee gas supply or availability for a specific project. It is for demonstration purposes only indicating Natural Gas infrastructure.



ENBRIDGE GAS INC.

Response to Interrogatory from
Climate Network Lanark

Questions:

- a) If Enbridge is not aware of any anticipated gas works that would be constructed in the expanded approval area within Tay Valley, how does Enbridge justify the approval to construct gas works in this area being a “necessity”?
 - b) Section 8 of the Municipal Franchises Act (MFA) states that approval to construct gas works “shall not be given unless public convenience and necessity appear to require that such approval be given.” This would appear to state that approval can only be provided if it is necessary. Please indicate clearly whether Enbridge agrees or disagrees. Please explain. It is important that the intervenors and the OEB understand what approval criteria Enbridge believes applies.
-

Response:

- a) Enbridge Gas’ Application is consistent with recent CPCN decisions in which the OEB has noted that issuing new CPCNs that are geographically aligned with municipal borders is consistent with the intent of the OEB that the CPCN holders update service areas if boundaries of their existing CPCNs are affected by municipal amalgamations, annexations or name changes.¹ This position is supported by the guidance in the *Natural Gas Facilities Handbook* to notify the OEB of any change to municipal boundaries in order to have CPCNs amended to reflect any change.²
- b) The above noted intent is consistent with the requirement of section 8 of the *Municipal Franchises Act* because the updating of legacy CPCNs to ensure alignment with changing municipal boundaries avoids the potential for regulatory overlap and provides clarity for all stakeholders. Section 8 does not provide that approval can only be provided if it is necessary, as the question suggests, but rather if it is both for public convenience AND is necessary.

The Supreme Court of Canada noted when reviewing statutes which rely on “public convenience and necessity” as a threshold test that: “the word “necessity” as here used does not bear its strict dictionary meaning. Its meaning must be ascertained in each case by reference to the context and to the objects and purpose of the statute in which it is found; in particular, it has been held that the word is not restricted to present **needs but includes provision for the future.**”³ [emphasis added].

¹ For example, OEB Decisions and Orders issued in [EB-2024-0294](#), [EB-2023-0239](#) and [EB-2023-0146](#).

² [Natural Gas Facilities Handbook](#)

³ [Memorial Gardens Association \(Canada\) Limited v. Colwood Cemetery Company, \[1958\] S.C.R. 353](#)

The OEB's intent to ensure areas covered by CPCNs are aligned with municipal boundaries meets the test of public convenience and necessity because it provides a forward-looking regulatory environment that is rational, understandable and efficient. In its recently released Integrated Energy Plan,⁴ the Government of Ontario has made it plain that customer choice will continue to be a corner stone of provincial energy policy, noting that the policy: "supports this choice by making a diverse range of energy options available, from natural gas and electricity to low-carbon fuels like renewable natural gas, hydrogen and biofuels. Customers can choose to stay with familiar energy sources, adopt emerging technologies like heat pumps or EVs, or combine solutions through hybrid systems. This flexibility helps households and businesses keep costs down while ensuring they have reliable energy when they need it most."

⁴ [Energy For Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7](#); Ontario, June 2025

ENBRIDGE GAS INC.

Response to Interrogatory from
Climate Network Lanark

Questions:

- a) Section 8 of the MFA states that approval to construct gas works “shall not be given unless public convenience and necessity appear to require that such approval be given.” Please explain what criteria must be met for “public convenience and necessity” to require approval and explain how the specific approvals sought in Tay Valley Township meet each of those criteria.
 - b) Multiple Courts of Appeal have held that: “the phrase ‘public convenience and necessity’ has generally been treated as synonymous with public interest.”¹ Does Enbridge agree, and if yes, what public interest factors are relevant in this case in Tay Valley Township?
-

Response:

- a) Please refer to the response at Exhibit EGI-CNL-2.
- b) As noted at Exhibit EGI-CNL-2, the Supreme Court of Canada has stated that the phrase “public convenience and necessity” must be considered within the context of the legislation that it exists. The alignment of CPCNs with changing / updated municipal boundaries in accordance with OEB direction is an efficient and effective use of the regulatory system. The Government of Ontario’s recently released Integrated Energy Policy² reinforces the OEB’s role in the rational expansion of the natural gas network within the province. The OEB’s policy to ensure that CPCNs are updated to align with municipal boundaries ensures that there are no barriers to necessary expansion of the gas system when needed.

¹ Sunshine Transit Service a/o Sunshine Limousine Service v. The Taxicab, 2014 MBCA 33 (CanLII), at para 41, <https://canlii.ca/t/g6b1h#par41>.

² [Energy For Generations: Ontario’s Integrated Plan to Power the Strongest Economy in the G7](#); Ontario, June 2025

ENBRIDGE GAS INC.

Response to Interrogatory from
Climate Network Lanark

Questions:

- a) Page 34 of the Tay Valley Township Climate Action Plan states: “Natural gas is a particular concern as the climate crisis worsens. Where natural gas was once seen to be a good transition fuel between the most polluting of the fossil fuels – coal and oil – and renewable sources of energy, in recent years it has become clear that it is a particular contributor to climate change. Natural gas is primarily methane, and methane has a global heating effect that is more than 80 times that of carbon dioxide in the first 20 years after it is released.” Please provide a list of the assertions in this paragraph and indicate the ones that Enbridge agreed and disagrees with. For those it disagrees with, please provide what Enbridge believes is the necessary correction (e.g. for the global heating effect of gas).
 - b) With respect to Tay Valley Township’s concerns regarding the climate impacts of gas and its plan to “convert fossil fuel heating to electric” (Climate Action Plan, p. 34), please confirm:
 - (i) The proportion of Ontario’s GHG emissions arising from the combustion of natural gas;
 - (ii) The tonnes of CO₂e from a m³ of gas combusted in Tay Valley Township, broken down by the combustion emissions and the upstream emissions; and
 - (iii) The expected physical lifetime and depreciation period for gas pipelines that would be built in Tay Valley Township (if this depends on the type of pipe, please provide the response for different types).
 - c) If Enbridge believes that Tay Valley Township’s Climate Action Plan is irrelevant to the test under s. 8 of the MFA, please justify that position with respect to the specific wording in that section.
-

Response:

- a) The purpose of this Application is to consider Enbridge Gas’ request to extend its current CPCN for the former Township of Bathurst to include the former Townships of South Sherbrooke and North Burgess, that, because of amalgamation and a name change are now all part of the Township of Tay Valley. As was noted in its decision to deny the request for intervenor status of Environmental Defence in this proceeding, the OEB will not be conducting a generic review of broad policy matters that have implications for communities and natural gas consumers across Ontario. As was noted in the Government of Ontario’s recently released Integrated Energy Plan,¹ the OEB will continue to play its role as the natural gas system’s economic regulator, protecting consumers, allowing gas utilities an opportunity to earn a fair return on investment, and enabling the continued rational expansion of the natural gas system.

¹ [Energy For Generations: Ontario’s Integrated Plan to Power the Strongest Economy in the G7](#); Ontario, June 2025

This proceeding, being an administrative proceeding to align a CPCN with municipal boundaries, is part of that mandate. The OEB is limited to the regulation of the delivery, storage and supply of natural gas. On the other hand, the OEB does not regulate the utilization of natural gas or any effects arising from its use. In light of the foregoing and given that broad assertions related to climate change are not relevant to the approvals sought in this proceeding, Enbridge Gas declines to provide the information requested.

- b) Please refer to the response to part a).
- c) Please refer to the response to part a).

ENBRIDGE GAS INC.

Response to Interrogatory from
Climate Network Lanark

Questions:

- a) Please provide all regulatory documents that Enbridge relies on in support of this application. Please excerpt the sections of all such regulatory documents that Enbridge relies on.
 - b) Please provide all past OEB decisions that Enbridge relies on in support of this application. Please excerpt the sections of all such OEB decisions that Enbridge relies on.
 - c) Please confirm that, unlike with Municipal Franchise Agreements, there has never been a generic hearing to delineate the criteria that should be considered in approvals under s. 8 of the MFA. If such a generic hearing has occurred, please provide the outcome and excerpt all portions relevant to this proceeding.
 - d) In its letter of June 12, 2025, Enbridge stated as follows: “In recent CPCN decisions, the OEB has noted that issuing new CPCNs that are geographically aligned with municipal borders is consistent with the intent of the OEB that the CPCN holders update service areas if boundaries of their existing CPCNs are affected by municipal amalgamations, annexations or name changes.” This paragraph refers to multiple decisions (i.e. plural). Please provide all such decisions.
 - e) Please confirm that OEB decisions are not binding on future commissioners adjudicating future applications.
 - f) Please confirm that *stare decisis* does not apply to OEB decisions.
-

Response:

- a) It is not clear what is meant by the reference “regulatory documents”. The Application is based on the provisions of the *Municipal Franchises Act* and the *Natural Gas Facilities Handbook*.
- b) While there have been several such proceedings, please refer to the Findings sections of the Decisions issued in the following proceedings: [EB-2023-0146](#), [EB-2023-0175](#), [EB-2024-0168](#), [EB-2024-0294](#), [EB-2023-0239](#) and [EB-2023-0146](#).
- c) Enbridge Gas is not aware of such a generic proceeding.
- d) Please refer to the response to part b).
- e) This question, and question f) are outside of the scope of Procedural Order No. 3, which permitted CNL to request any “relevant information or documentation” that is in addition to the Enbridge Gas evidence. These questions are not seeking information. The questions ask for legal conclusions that are properly for the OEB to determine, rather than parties to a proceeding.

As these are questions for the OEB to answer, Enbridge Gas' views are not determinative and perhaps not even useful. With that being said, Enbridge Gas does not view the answers to these statements as being binary in the way that the questions are phrased. While it may be argued that single decisions of the OEB are not binding on future panels and that the principle of *stare decisis* does not strictly apply, the reality is that all parties rely on the regulator to issue decisions that are consistent and predictable. Therefore, unless there is good reason to depart from a prior decision that addresses identical circumstances, Enbridge Gas would expect the OEB to issue a similar decision on the new application.

- f) Please refer to the response for part e) above.

ENBRIDGE GAS INC.

Response to Interrogatory from
Climate Network Lanark

Questions:

- a) Does Enbridge believe that the municipality's objection in this case is relevant to whether approval is required by "public convenience and necessity?"
 - b) Please provide all decisions where the OEB considered whether to impose a s. 8 approval sought by Enbridge or one of its predecessors against the will of the municipality in question.
-

Response:

- a) Please refer to the response at Exhibit EGI-CNL-5(e). This question is not asking for information but rather is seeking a legal conclusion that is solely within the mandate and jurisdiction of the OEB.
- b) Enbridge Gas is not aware of such a decision.

ENBRIDGE GAS INC.

Response to Interrogatory from
Climate Network Lanark

Questions:

- a) How much gas was combusted in Tay Valley Township over the past five years and how much is forecasted over the next five years? What are the GHG emissions arising therefrom (CO₂e)?
-

Response:

- a) The purpose of this Application is to consider Enbridge Gas' request to extend its current CPCN for the former Township of Bathurst to include the former Townships of South Sherbrooke and North Burgess, that, because of amalgamation and a name change are now all part of the Township of Tay Valley. As was noted in its decision to deny the request for intervenor status of Environmental Defence in this proceeding, the OEB will not be conducting a generic review of broad policy matters that have implications for communities and natural gas consumers across Ontario. Given that broad assertions related to climate change are not relevant to the approvals sought in this proceeding, Enbridge Gas declines to provide the information requested.

ENBRIDGE GAS INC.

Response to Interrogatory from
Climate Network Lanark

Questions:

- a) The OEB Natural Gas Facilities Handbook states on page 14: “A certificate will define the specific area within a municipality where a utility is permitted to construct natural gas works. The OEB may issue a certificate that does not cover the entire geographic area of a municipality but is instead limited to a route along certain defined roads (also known as “on-from-to”) or an area defined by metes and bounds.” Could that approach be taken here such that a new certificate does not expand the area in which Enbridge has approval to construct gas works?
 - b) Please provide a copy of any certificates held by Enbridge under s. 8 of the MFA “that does not cover the entire geographic area of a municipality” (per p. 14 of the OEB Natural Gas Facilities Handbook). If there are a very large number, please provide the five most recent.
-

Response:

- a) Based on decisions that have been issued by the OEB, situations resulting in CPCNs being issued that do not cover the entire geographic area of a municipality are related to occasions where more than one natural gas distributor is operating. As is noted at the same page of the *Natural Gas Facilities Handbook* referenced in the question:

If a certificate has been issued for a particular area in which there is currently no gas distribution service, another person may apply for a certificate to serve that area. The OEB may amend an existing certificate to remove authorization to serve a specific geographic area and grant that authorization to another person, if public convenience and necessity require that such authorization be given. In so doing, the OEB would seek to ensure that the two certificates would cover mutually exclusive areas.

The OEB will determine the area that will be covered by any CPCN held by Enbridge Gas.

- b) Enbridge Gas has several limited CPCNs, primarily in municipalities where EPCOR Natural Gas, Six Nations Natural Gas, Kitchener Utilities and Utilities Kingston provide services as well. For example, please refer to the Decisions issued in the following proceedings: [EB-2021-0238](#), [EB-2020-0232](#), [EB-2019-0232](#), [EB-2025-0095](#) and [EB-2015-0296](#).

ENBRIDGE GAS INC.

Response to Interrogatory from
Climate Network Lanark

Questions:

- a) Is Enbridge planning to construct any pipelines in the area covered by the proposed Tay Valley Township MFA s. 8 certificate?
 - b) If yes:
 - i. Please provide a map showing the proposed new pipeline(s) and the location of potential new customers who may connect to that pipeline;
 - ii. Please indicate the number of customers that Enbridge expects to connect to that pipeline over the next 10 years; and
 - iii. Please indicate the number of residents or businesses that are located along that pipeline route.
 - c) Please indicate the number of customers that Enbridge expects to connect to any existing pipelines in Tay Valley Township over the next 10 years.
 - d) Please indicate the number of residents or businesses that are located along existing pipelines in Tay Valley Township that have not connected to the gas system but could connect due to their proximity to an existing pipeline.
-

Response:

- a) Please refer to the response at Exhibit EGI-STAFF-2.
- b) Please refer to the response at Exhibit EGI-STAFF-2.
- c) Please refer to the response at Exhibit EGI-STAFF-2.
- d) Based on available records, there are 31 properties with structures along existing pipelines located within the Township of Tay Valley that are not currently provided services by Enbridge Gas.