



July 16, 2025

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

Dear Mr. Murray:

Re: Enbridge Gas Inc.

Application for Approval of Franchise Agreement and New CPCN - City of Guelph Ontario Energy Board File No. EB-2025-0058

Pursuant to Procedural Order No. 3, Enbridge Gas submits the attached interrogatories on the evidence submitted by the City of Guelph. These interrogatories are without prejudice to Enbridge Gas' views on the relevance of any of the City of Guelph evidence, as previewed in our letter dated July 10, 2025 and as Enbridge Gas will address further in final submissions.

Enbridge Gas has no interrogatories on the evidence submitted by eMERGE Guelph.

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

Yours truly,

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Regulatory Research and Records
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Natalya Plummer, OEB

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## ENBRIDGE GAS INC. INTERROGATORIES TO THE CITY OF GUELPH

1. **References**: City of Guelph Evidence (July 2, 2025), Exhibit 1-2-5

Costs of Relocations and Repairs of Enbridge Gas Lines

City of Guelph Evidence (July 2, 2025), Exhibit 1-2-6

• List of Abandoned Enbridge Gas Lines

City of Guelph Evidence (July 2, 2025), Exhibit 1-2-7

 Invoice for Repairs and Additional Work re Manitoba Street Reconstruction (June 2025)

City of Guelph Evidence (July 2, 2025), Exhibit 1-2-8

 Inspector Notes of removal of gas lines re Manitoba Street Reconstruction (August 2021)

## Questions:

- (a) Please provide specific details of the work undertaken related to each of the POs listed at Exhibit 1-2-5.
- (b) Please confirm that on pages 8 10 at Exhibit 1, Tab 2, the City of Guelph is implying that all decommissioned or abandoned pipelines that it encounters during its projects is owned by Enbridge Gas.
- (c) How has the City of Guelph determined the quantity, existence and age of abandoned gas pipelines referenced at Exhibit 1-2, paragraph 8 and that those pipelines are owned by Enbridge Gas? Please produce any records upon which the City of Guelph is relying in this regard.
- (d) Please provide specific detail of the installation and abandonment dates of the pipe identified at Exhibit 1-2-6 (identified in the Exhibit List as "List of Abandoned Enbridge Gas Lines").
- (e) Please confirm that the Guelph Gas Company provided gas distribution services via pipelines to Guelph residents in the past and the time period during which the Guelph Gas Company provided such services.
- 2. **References**: City of Guelph Evidence (July 2, 2025), Exhibit 1-3 Affidavit of Tijo Joseph

## Questions:

- a) Please confirm whether and the extent to which the City of Guelph confers or collaborates with other Ontario municipalities on any climate action initiatives. Provide the names of all such municipalities and an example of the any such collaboration with the City of Guelph.
- b) To the best of your knowledge, please confirm what Ontario municipalities other than the City of Guelph have community energy or climate action plans, commitments or policies aimed in any way at reduction of greenhouse gas emissions.