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**BY EMAIL**

August 7, 2025

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

Dear Mr. Murray:

**Re: Enbridge Gas (Enbridge Gas)  
Mississauga Reinforcement Project  
OEB Staff Interrogatories  
Ontario Energy Board File Number: EB-2025-0073**

In accordance with Procedural Order No. 1, please find attached the OEB staff interrogatories for the above proceeding. This document has been sent to Enbridge Gas and to all other registered parties to this proceeding.

Enbridge Gas is reminded that its responses to interrogatories are due by August 21, 2025.

Yours truly,

Judith Fernandes  
Senior Advisor, Natural Gas Applications

Encl.

**OEB Staff Interrogatories  
Enbridge Gas Inc.  
EB-2025-0073**

Please note, Enbridge Gas 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*.

**ISSUE 1.0 NEED FOR THE PROJECT**

**Staff-1**

**Ref:** Exhibit B, Tab 1, Schedule 1, pp.1,4

**Preamble:**

Enbridge Gas stated that the Project is required to meet the requests of existing customers, Petro-Canada Lubricants Inc., CRH Canada Group Inc., and CertainTeed Canada Inc. (collectively, the customers) for incremental natural gas service. The customers have requested a total incremental firm natural gas service request of 25,902 m<sup>3</sup>/hr starting December 1, 2026. Enbridge Gas has stated that the Project was identified in the Enbridge Gas Asset Management Plan 2025-2034, filed with the OEB on November 8, 2024.

**Questions:**

- a) When did Enbridge Gas first become aware of the need for the Project?
- b) Does Enbridge Gas expect the Project to serve additional loads in this area either now or in the future? If so, please provide details.
- c) Please provide any updates on new or continuing discussions with the customers.

**Staff-2**

**Ref:** Exhibit A, Tab 2, Schedule 1, p. 2  
Exhibit D, Tab 1, Schedule 1, Attachment 4

**Preamble:**

Enbridge Gas provided a construction schedule for the Project. To meet construction timelines, Enbridge Gas requested approval of the application by December 2025.

**Questions:**

- a) Please discuss any associated risks and impacts if the proposed construction start and/or in-service date for the Project are delayed.
- b) Please discuss the impact to the proposed construction schedule and in-service date if Enbridge Gas receives a decision and order from the OEB later than December 2025.

**ISSUE 2.0 PROJECT ALTERNATIVES**

**Staff-3**

**Ref:** Exhibit C, Tab 1, Schedule 1, pp.1-4

**Preamble:**

Enbridge Gas provided a discussion of the route/facility alternatives that it considered. Enbridge Gas stated that based on its assessment, it determined that the Project is the optimal solution to meeting the Project need.

Enbridge Gas stated that it has applied the Binary Screening Criteria set out in the OEB's IRP Framework and determined that the Project meets the definition of a Customer-Specific Build, as defined in the IRP Framework.

**Questions:**

- a) Please provide estimated costs for the route/facility alternatives described by Enbridge Gas in its application.
- b) The IRP Framework notes that an IRP evaluation is not required for customer-specific builds when the customer(s) fully pay for the incremental infrastructure

costs and have made a clear request for a facility project and either the choice to pay a Contribution in Aid of Construction(CIAC) or to contract for long-term firm services delivered by such facilities. Please confirm that Enbridge Gas's position is that this criterion has been met because a CIAC is not required (based on the results of its E.B.O. 188 assessment, including the 20 year time horizon) and the customers have entered into long-term firm service contracts.

- c) Has Enbridge Gas discussed any DSM opportunities with the customers to potentially reduce the size of the build, as recommended in the IRP Framework? If so, please provide details of the discussions with the customers.

### **ISSUE 3.0 PROJECT COST AND ECONOMICS**

#### **Staff-4**

**Ref:** Exhibit E, Tab 1, Schedule 1, p.1

#### **Preamble:**

Enbridge Gas stated that the total cost of the Project is estimated to be \$18.97 million. Enbridge Gas stated that that it has executed long-term firm service contracts with the customers to fully fund the cost of the Project and that there will be no cost impact on existing ratepayers.

#### **Questions:**

- a) Please confirm whether the executed contracts provide that the customers will cover the actual final Project costs in the event that the actual costs exceed the estimated total Project costs of \$18.97 million. If not, please explain how Enbridge Gas expects to manage any additional costs that exceed the estimated costs.
- b) Please explain the reason for the differences in the lengths of the long-term firm service contracts with each of the customers.
- c) Do the contracts contain penalties/exit fees if cancelled or underutilized? Please provide any additional information that supports Enbridge Gas's statement that there will be no cost impact on existing ratepayers.

**Staff-5**

**Ref:** Exhibit E, Tab 1, Schedule 1, p.1

**Preamble:**

Enbridge Gas stated that the Project cost estimate includes a 25% contingency applied to all direct costs and that this contingency amount has been calculated based on the risk profile of the Project and is consistent with contingency amounts calculated for similar Enbridge Gas projects in the past. Enbridge Gas provided examples of other OEB approved Enbridge Gas projects, with similar contingency amounts, as referenced in the evidence.

**Question:**

- a) Please provide a narrative on the aspects of risk profile of the Project that results in the proposed 25% contingency amount and how these aspects compare to other relevant past projects.

**ISSUE 4.0 ENVIRONMENTAL IMPACTS**

**Staff-6**

**Ref:** Exhibit F, Tab 1, Schedule 1, p.3 and Environmental Report, Appendix A.6

**Preamble:**

Enbridge Gas stated that the draft Environmental Report (ER) was circulated to the Ontario Pipeline Coordinating Committee (OPCC), Municipalities, Conservation Authorities, and Indigenous communities on January 6, 2025, with a request for comments by February 17, 2025. Enbridge Gas filed the comments received on the ER in Appendix A.6.

**Questions:**

- a) Please file an update of the comments provided in Appendix A.6 (summarized in tabular format) that Enbridge Gas has received as part of its consultation since the application was filed, including the supporting documentation, i.e. email correspondence that is referenced. Please include the dates of communication, the issues and concerns identified by the parties, as well as Enbridge Gas's responses and actions to address these issues and concerns.

- b) Please provide an update on the status of the TSSA's review of the Project, including any relevant correspondence confirming that the TSSA has reviewed the design of the proposed facilities and found them to be compliant with the requirements of the Canadian Standards Authority standard CSA Z662.

### **Staff-7**

**Ref:** Exhibit F, Tab 1, Schedule 1, pp. 5,6

#### **Preamble:**

Enbridge Gas stated that a Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment (CHRECPIA) and a Stage 2 Archaeological Assessment (AA) will be completed and submitted to the Ministry of Citizenship and Multiculturalism (MCM) for review.

#### **Questions:**

- a) Please provide an update on whether the CHRECPIA and a Stage 2 AA have been completed and submitted to MCM.
- b) Please provide a summary of any comments that have been received from MCM.
- c) Please advise whether any of the Indigenous communities that Enbridge Gas is required to consult in relation to the Project have been involved or participated in the field work relating to Stage 1 and/or Stage 2 AAs. If so, please provide a summary of any comments received from any community that has participated or been involved in any of these AAs.

## **ISSUE 5.0: ROUTE MAP AND FORM OF LANDOWNER AGREEMENTS**

### **Staff-8**

**Ref:** Exhibit G, Tab 1, Schedule 1, p. 1 and Attachment 4

#### **Preamble:**

Enbridge Gas stated that the Project is anticipated to follow the public road allowance for the entirety of the proposed pipeline route; it is not anticipated that any permanent easements will be required for the Project and temporary working areas may be required along the permanent route where the road allowance is too narrow or confined

to facilitate construction and for the construction contractor's laydown yard/work area (location to be confirmed). These areas are to be identified with the assistance of the construction contractor and agreements for temporary working rights will be negotiated where required.

In Attachment 4, Enbridge Gas provided the list of directly and indirectly impacted landowners.

**Question:**

- a) Please provide an update on the status of land negotiations where any permanent and/or temporary easements are required. Please include any concerns raised by landowners and Enbridge Gas's responses.

**Staff-9**

**Ref:** Exhibit G, Tab 1, Schedule 1, pp.1,2 and Environmental Report, Table 1, pp. 5,6

**Preamble:**

Enbridge Gas identified the potential permits/approvals that may be required for the Project at the reference above and in the Environmental Report.

Enbridge Gas also stated that other authorizations, notifications, permits and/or approvals may be required in addition to the ones listed.

**Questions:**

- a) Please advise whether Enbridge Gas has identified any other permits/approvals required for the Project other than those listed in the application. If so, please provide a description of the required permit/approval.
- b) Please provide an update on the status of each permit/approval required for the construction of the Project including when Enbridge Gas expects to receive the required permit/approval.

**ISSUE 6.0 INDIGENOUS CONSULTATION**

**Staff-10**

**Ref:** Exhibit H, Tab 1, Schedule 1, p.1, Attachments 3,6,7

**Preamble:**

The Ministry of Energy and Mines<sup>1</sup> (Ministry) identified four Indigenous communities that Enbridge Gas should consult in relation to the Project:

- Huron-Wendat Nation (HWN)
- Mississaugas of the Credit First Nation (MCFN)
- Six Nations of the Grand River (SNGR)
- Haudenosaunee Confederacy Chiefs Council (HDI)

In Attachment 6, Enbridge Gas filed its Indigenous Consultation Report summarizing its Indigenous consultation activities up to May 1, 2025.

Enbridge Gas stated that it has provided its Indigenous Consultation Report for review by the Ministry and that the Ministry will determine whether the procedural aspects of consultation undertaken by Enbridge Gas to-date for the purpose of the application for leave to construct for the Project are satisfactory by providing a Letter of Opinion to Enbridge Gas.

**Questions:**

- a) Please provide an update on Indigenous consultation activities set out in Attachments 6 and 7, summarizing any issues and concerns raised and how these are being addressed. Please include any supporting documentation, i.e., email correspondence that is referenced.
- b) Please update the evidence with any correspondence between the Ministry and Enbridge Gas since the application was filed, regarding the Ministry's review of Enbridge Gas's consultation activities.
- c) Please indicate when Enbridge Gas expects to receive a Letter of Opinion from the Ministry.
- d) Please comment on any issues arising from the Project that could adversely impact constitutionally protected Aboriginal or treaty rights. Have any Indigenous communities identified any Aboriginal or treaty rights that could be adversely impacted by the Project? If any potential adverse impacts have been identified, please comment on what Enbridge Gas is doing to address these issues.

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<sup>1</sup> Formerly the Ministry of Energy and Electrification



**Staff-11**

**Ref:** Exhibit H, Tab 1, Schedule 1, Attachment 6, p.1 and Attachment 7, Line-item attachments 1.8, 1.9

**Preamble:**

In its email response to Enbridge Gas regarding the draft Environmental Report that was circulated to HDI, HDI stated it will not be commenting on or reviewing any documents provided by Enbridge, including the Environmental Report, until there is a signed overarching agreement in place. HDI noted that this would apply to any Enbridge work within its treaty territory. Enbridge Gas has stated that it will continue to try to engage with HDI in relation to the Project.

Line-item 1.9 references documentation and a follow-up meeting.

**Questions:**

- a) Please provide an update on any consultation activities undertaken with respect to HDI, since the application was filed, summarizing any issues and concerns raised and how these are being addressed. Please include any supporting documentation, i.e., email correspondence that is referenced.
- b) Has the overarching agreement referenced by HDI been signed? Please provide any updates on the progress of this matter as well as any other information that would be helpful in understanding the nature and status of the consultation with HDI to date.

**Staff-12**

**Ref:** Exhibit H, Tab 1, Schedule 1, Attachment 6, p.2 and Attachment 7, Line-item attachments 2.9, 2.10

**Preamble:**

On February 10, 2025, MCFN provided an email response to the draft Environmental Report, setting out several questions and comments and requested a response to its feedback. Enbridge Gas responded to MCFN on February 10, 2025, stating that it would discuss the comments/requests received internally and provide a response.

**Questions:**

- a) Please provide Enbridge Gas's response to the comments/requests of MCFN.

- b) Please provide an update on any consultation activities undertaken with respect to MCFN, since the application was filed, summarizing any issues and concerns raised and how these are being addressed. Please include any supporting documentation, i.e., email correspondence that is referenced.

### **Staff-13**

**Ref:** Exhibit H, Tab 1, Schedule 1, Attachment 6, pp. 3,4 and Attachment 7, All Line-item attachments

#### **Preamble:**

Enbridge Gas and SNGR have exchanged several emails regarding the Project. In its emails, SNGR has indicated that certain environmental studies are required to make an informed assessment of potential rights impacts and requested for a meeting to further discuss the Project, which is yet to be scheduled.

Enbridge Gas has noted that SNGR has outstanding concerns and has proposed a meeting with SNGR to have a better understanding of SNGR's concerns and comments, stating that it will continue to engage with SNGR in relation to the Project.

#### **Questions:**

- a) Please provide Enbridge Gas's response to the comments/requests of SNGR.
- b) Please provide an update on any consultation activities undertaken with respect to SNGR, since the application was filed, summarizing any issues and concerns raised and how these are being addressed. Please include any supporting documentation, i.e., email correspondence that is referenced.

### **Staff-14**

**Ref:** Exhibit H, Tab 1, Schedule 1, Attachment 6, pp. 1,2 and Attachment 7, All Line-item attachments

#### **Preamble:**

Enbridge Gas and HWN have exchanged several emails regarding the Project. In its emails, HWN indicated that it was interested in participating in all archaeological fieldwork and receiving draft reports for review and comment and also requested information about the AAs planned for the Project.

Enbridge Gas stated that it has met with HWN regarding the timing of the Stage 2 AA and that it is putting together a capacity funding agreement.

According to the evidence presented, Enbridge Gas is still awaiting comments on the Environmental Report.

**Questions:**

- a) The Environmental Report was provided to HDI, MCFN and SNGR in January 2025 and was provided to HWN in March 2025. Please explain why HWN was provided with the Environmental Report later.
- b) Please provide any comments that have been provided by HWN to Enbridge Gas regarding the Environmental Report, including any supporting documentation, i.e. email correspondence that is referenced.
- c) Please confirm whether HWN and Enbridge Gas have executed the capacity funding agreement and provide a description of the activities supported by the capacity funding that was provided.
- d) Please provide an update on any consultation activities undertaken with respect to HWN, since the application was filed, summarizing any issues and concerns raised and how these are being addressed. Please include any supporting documentation, i.e., email correspondence that is referenced.