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August 21, 2025

VIA RESS AND EMAIL

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th floor
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Ritchie Murray:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File: EB-2025-0073
Mississauga Reinforcement Project
Interrogatory Responses**

In accordance with the OEB's Procedural Order No. 1 dated July 24, 2025, enclosed please find the interrogatory responses of Enbridge Gas.

If you have any questions, please contact the undersigned.

Sincerely,

Evan Tomek

Evan Tomek
Senior Advisor, Regulatory Applications – Leave to Construct

cc: Tania Persad (Enbridge Gas Counsel)
Arend Wakeford (Enbridge Gas Counsel)
Judith Fernandes (OEB Case Manager)
James Sidlofsky (OEB Counsel)
Amanda Montgomery (Elson Advocacy)
Kent Elson (Elson Advocacy)
Ian Mondrow (Gowling WLP (Canada) LLP) (Industrial Gas Users Association Counsel)

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB STAFF

Interrogatory

Reference:

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 m3/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.

Question(s):

- 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.

Response:

- a) The customers have been evaluating increased firm capacity for many years. Enbridge Gas first became aware of the need for the Project in Q3 2023, which necessitated a Non-Binding Expression of Interest and Binding Reverse Open Season (EOI/ROS) for the Oakville to Mississauga area in January 2024 as described in Exhibit B, Tab 1, Schedule 1. Please see the response at Exhibit I.STAFF-2 for project timing considerations.

- b) The proposed pipeline was sized to meet the needs of those existing customers who participated in the EOI and there are no current plans to use this pipeline to service additional loads.
- c) Enbridge Gas conducts monthly checkpoints with the customers to discuss the progress of the leave to construct application and design stages of the Project.

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB STAFF

Interrogatory

Reference:

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.

Question(s):

- 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.

Response:

- a) New sulphur dioxide (SO₂) emissions regulations (outlined in O. Reg. 88/22) take effect on January 1, 2027. These changes focus on reducing SO₂ discharge from flares and other sources, with specific requirements for monitoring, reporting, and minimization plans. The new regulations eliminate the option for Petro-Canada Lubricants Inc. ("Petro-Canada"), one of the three customers driving the Project, to use VLSFO (heavy fuel oil/bunker oil). Without the additional firm natural gas capacity the Project provides, Petro-Canada will be unable to use liquid fuels during interruptions, forcing a portion of the plant to shut down, especially during winter months when most interruptions occur. This risks solidification of products in pipes, lengthier restarts, and equipment and employee safety. The government-imposed SO₂ regulations are therefore a primary driver for Petro-Canada, making the Project's in-service date of November 1, 2026 critical to help ensure the January 1, 2027 deadline is met. Delays would force Petro-Canada to

cut throughput and shut down units, as heavy fuel oil use would no longer be permitted.

A delay to the proposed in-service date would also delay the benefits the Project would have for the customers as described in their respective letters of support found at Attachments 1 – 3 to Exhibit B, Tab 1, Schedule 1.

Furthermore, Enbridge Gas executed long-term service contracts with the customers with all contracts effective December 1, 2026.¹ In order to meet the service start date, construction of the Project is planned to commence in April 2026 with a target in-service date of November 1, 2026.² A delay to the proposed construction start date would therefore increase the risk of either missing the proposed in-service date or incurring additional construction costs for premium time not accounted for in the current estimate to meet the in-service date.

- b) Enbridge Gas requests approval of this application by December 2025 to incorporate a modest buffer into the Project schedule. An OEB decision after December 2025 would eliminate some or all of the contingency held within the schedule, which could remove additional time to address potential construction issues, material delivery issues, and/or permitting/regulatory approval times. This requested timing for approval is consistent with the OEB's leave to construct performance standards. Please see the response at part a) for details regarding the impacts of a delay to the proposed construction schedule and in-service date.

¹ Exhibit B, Tab 1, Schedule 1, para. 12.

² Exhibit B, Tab 1, Schedule 1, para. 13.

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB STAFF

Interrogatory

Reference:

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.

Question(s):

- 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.

Response:

- a) A Class 5 cost estimate was completed for the rebuild of the existing natural gas distribution station at the northeast quadrant of the Winston Churchill Boulevard and Royal Windsor Drive intersection that would also be required for Alternative Routes 1 and 2. As described in the response at Exhibit I.ED-2, fair market land values would bring the total cost estimates for any alternatives well above the Preferred Route for the Project. As a result, Enbridge Gas did not further refine cost estimates for alternatives. Please see the response at Exhibit I.ED-2 for more information.
- b) Confirmed. The binary screening criterion for customer-specific build has been met as the customers have entered long-term firm service contracts.
- c) The customers are engaged via Enbridge Gas's DSM Energy Solution Advisors that have regular on-going discussions to explore and support implementation of DSM opportunities. As part of the EOI process, customers are asked to confirm that Enbridge Gas has discussed conservation program offerings with them, and that the bid amounts reflected are inclusive of all future expected natural gas conservation activities (including natural gas conservation activities within and outside of Enbridge Gas's Demand Side Management programs, and the use of non-natural gas alternative options). All customers have confirmed that to be the case in their EOI responses.

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB STAFF

Interrogatory

Reference:

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 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.

Question(s):

- 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.

Response:

- a) Conservative revenue terms ranging from 2 to 9 years have been used in the executed contracts for the three customers served by this project. The length of the contract terms coincide with the length of time in which cost recovery is achieved. In addition, Enbridge Gas has included 25% contingency funds in the cost estimate to cover any unforeseen cost changes. Based on conversations with the customers, it is expected that they will continue to require the natural gas capacity beyond their

respective contract terms which will result in additional revenues beyond cost estimates for the project.

- b) The length of the contract term is determined using a Discounted Cash Flow (DCF) analysis, as prescribed by the Ontario Energy Board (OEB) in its E.B.O. 188 guidelines. Key inputs to the DCF analysis include estimates of customer specific revenues, capital investments, and ongoing costs. As noted in part a), differences in the length of the contract term reflect differences in parameter inputs and resulting cost recovery periods among the three customers on this project.
- c) Distribution contracts contain provisions that ensure contract customers pay for the capacity required and the cost of providing their service. Minimum annual volumes protect from underutilization and are part of firm contract rates. This ensures minimum annual revenues that are independent of consumption levels throughout the term of the contract. In the event of early termination of the distribution contract, the customer will be liable to pay the following amounts upon receipt of an invoice from Enbridge Gas:
 - 1. Any portion of the Enbridge Gas investment that has not been recovered through applicable rates and charges;
 - 2. Any decommissioning costs or expenses incurred, or reasonably expected to be incurred, by Enbridge Gas as a direct result of the customer ceasing to be a customer at the applicable location;
 - 3. All other charges that would have been payable by the customer for the remainder of the contract term related to the provision of service; and
 - 4. Any other outstanding amounts owed by the customer to Enbridge Gas.

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB STAFF

Interrogatory

Reference:

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(s):

- 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.

Response:

- a) Enbridge Gas maintains an internal Cost Management Standard which outlines suggested contingency ranges for different estimate classes. For the Mississauga Reinforcement Project, a Class 4 cost estimate was developed, for which the suggested contingency range is 15–40%. The selected contingency of 25% is slightly below the midpoint of this range (27.5%).

The Class 4 cost estimate was prepared using the same types of information as other relevant past projects, such as completed topographic surveys, preliminary sketches and bills of materials, and contractor courtesy quotes, and falls within the prescribed contingency range. In Class 4 cost estimates, risk is inherent since more prescriptive information, such as the results of subsurface utility and geotechnical investigations, issued for construction drawings, conditions of permits, and contractor budgetary quotes, are not yet available until later stages of the project, as was the case for the Mississauga Reinforcement Project. Considering the Project's

risk profile, Enbridge Gas considers the applied contingency of 25% to be appropriate and consistent with other similar projects¹ (on the basis of similar locations, construction methods, alliance partner work crews, and stage of the project at the time of the estimate) such as the Liberty Village Pipeline Project (EB-2018-0096), Scarborough Subway Extension – Lawrence Ave East Station Relocation Project (EB-2023-0260), NPS 20 Waterfront Relocation Project (EB-2022-0003) and Ontario Line – Overlea Station Relocation Project (EB-2024-0250) which had contingencies of 25%, 25%, 30% and 30%, respectively.

¹ Exhibit E, Tab 1, Schedule 1, footnote 2.

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB STAFF

Interrogatory

Reference:

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.

Question(s):

- 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.

Response:

- a) Enbridge Gas received comments from the Mississaugas of the Credit First Nation on the draft ER on February 10, 2025.¹ Enbridge Gas responded to these comments on July 30, 2025 and apologized for the delay. Please see Attachment 2 to Exhibit I.STAFF-10, line-item attachments 2.11 and 2.12 for an update in this regard. No additional comments have been received by Enbridge Gas as part of its consultation since the application was filed.

¹ Exhibit H, Tab 1, Schedule 1, Attachment 7, p. 81.

- b) On August 13, 2025, Enbridge Gas received a signed TSSA review letter for the Project which can be found at Attachment 1 to this Exhibit. The review letter confirms that the TSSA has reviewed the technical aspects of the Project and did not find any non-compliances with Ontario Regulation 210/01 or the TSSA's Oil and Gas Code Adoption Document.



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Cody Raposo
Enbridge Gas Inc.
1211 Amber Drive, Thunder Bay, ON
P7B 6M4

August 13, 2025

Re: Mississauga Reinforcement Project- TSSA file WO# 14581589

The applicable regulation that applies to this Project is [Ontario Regulation 210/01: Oil and Gas Pipeline Systems](#). The applicable standard for this project is CSA Z662-23 which TSSA adopted under [Oil and Gas Code Adoption Document](#) (CAD). The mentioned Code Adoption Documents (CAD) specifies the standards that are adopted by TSSA and any changes or addition to the requirements of CSA Z662-23.

TSSA audits all utility companies that are licensed to distribute “gas” in the province of Ontario. TSSA also reviews and audits all new pipeline projects that are submitted to OEB for leave to construct. The review of the new pipeline projects submitted to OEB consist of reviewing the technical aspect of the project and focused on compliance to the adopted standards and O.Reg.210/01. TSSA has authority to issue orders to the operator for any non-compliances to the regulation and/or adopted standards.

This project so far has been reviewed on the technical aspects of the project including design, material specification, installation of excess flow valves, strength and leak test data and pressure test requirements. TSSA did not find any non-compliances to the regulation or the adopted standard.

TSSA may audit and inspect the EGI to ensure compliance with applicable technical and safety standards for construction and operation of this project.

Should you have any questions, please contact me at (416) 734-3456 or by e-mail at rsantiago@tssa.org. When contacting TSSA regarding this file, please refer to the Work Order number provided above.

Yours truly,

Ramona Santiago
Fuels Safety Engineer
Tel.: (416) 734-3456
Cell: (416) 518-2875

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB STAFF

Interrogatory

Reference:

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.

Question(s):

- 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.

Response:

- a) The CHRECPIA and Stage 2 AA have not been completed and submitted to the MCM. Please see Attachment 1 to Exhibit I.STAFF-9 for more details regarding the anticipated timing for completing and submitting the CHRECPIA and Stage 2 AA to the MCM.
- b) Please see Table 1 at Attachment 1 to this Exhibit.
- c) Enbridge Gas has not received any comments from the Indigenous communities on the Stage 1 AA report that is contained in the Environmental Report. The Stage 2

AA has not been completed. Enbridge Gas will invite the Indigenous groups identified in the Delegation Letter¹ to attend the Stage 2 AA fieldwork, once planned.

¹ Exhibit H, Tab 1, Schedule 1, Attachment 3.

Table 1: Ministry of Citizenship and Multiculturalism (MCM) Comment Summary

Name	Email	Date Received	Summary of Comments	Date of response	Summary of Response
Liam Smythe	Liam.Smythe@ontario.ca	24-Jul-24	The MCM provided a letter outlining guidance for proceeding with the Stage 1 Archaeological Assessment (AA) and the Cultural Heritage Report which will need to be included in the Environmental Report (ER).	30-Jul-24	A Stantec representative thanked the MCM for their email and stated that they will be proceeding with a Stage 1 AA and Cultural Heritage Report.
Karla Barboza	Karla.Barboza@ontario.ca	21-Oct-24	Karla Barboza said that the MCM's comments from July 24, 2024 are still valid at this time and noted that the Stage 1 AA had been submitted to the MCM. The MCM also asked if the Cultural Heritage Report was going to be submitted to the MCM.	14-Nov-24	A Stantec representative shared the Stage 1 AA Project number and stated that Stantec has prepared a Cultural Heritage Screening Report and recommends the preparation of a Cultural Heritage Report which will be undertaken by Enbridge after the ER is submitted to the OEB.
Liam Smythe	Liam.Smythe@ontario.ca	11-Feb-25	Liam Smythe provided comments on the draft ER on behalf of the MCM.	13-Feb-25	A Stantec representative thanked Liam Smythe for

Name	Email	Date Received	Summary of Comments	Date of response	Summary of Response
			Comments included considering the results of the Stage 1 AA to be preliminary until the MCM provided comments on the Stage 1 AA. Section 7.1.10 14 should also be revised to outline commitments for future archaeological assessment (as appropriate) and include paragraphs about undocumented archaeological resources and human remains discovery.		providing comments on behalf of the MCM.
Jason Stephenson	<a href="mailto:jason.stephenso
n@ontario.ca">jason.stephenso n@ontario.ca	23-July-25	Jason Stephenson provided confirmation that the MCM has reviewed the Stage 1 AA Report submitted by Stantec and provided requested revisions to the Report.	23-July-25	Stantec's Archaeologist requested clarification regarding MCM's requested revisions.
Jason Stephenson	<a href="mailto:jason.stephenso
n@ontario.ca">jason.stephenso n@ontario.ca	29-July-25	1. Jason Stephenson provided clarification regarding MCM's	29-July-25	1. Stantec's Archaeologist called Jason Stephenson

Name	Email	Date Received	Summary of Comments	Date of response	Summary of Response
			requested revisions to the Stage 1 AA Report. 2. Jason Stephenson provided an email summary of the phone call which further clarified MCM's requests.		to discuss MCM's requested revisions.

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB STAFF

Interrogatory

Reference:

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(s):

- 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.

Response:

- a) Enbridge Gas does not require any permanent easements along the proposed pipeline route. Enbridge Gas is currently in negotiations with one of the customers for the Project to secure a temporary easement for a laydown/work area. There have been no other landowners approached for property rights. There have been no concerns raised by landowners and Enbridge Gas does not anticipate any issues with obtaining the aforementioned temporary easement prior to construction.

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB STAFF

Interrogatory

Reference:

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.

Question(s):

- 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.

Response:

- a) No other permits/approvals required for the Project other than those listed in the application have been identified.
- b) Please refer to Table 1 at Attachment 1 to this Exhibit for 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.

Table 1 - Permit and Approval Status

Permit/Approval	Administering Agency	Status
Species at Risk Act (SARA) (2002) (amended in February 2023)	Fisheries and Oceans Canada (DFO) (aquatic species), Environment and Climate Change Canada (terrestrial species)	Not required.
Permit to Take Water (PTTW) or Environmental Activity and Sector Registry (EASR) (surface and groundwater) under the <i>Ontario Water Resources Act</i> (1990) (amended in June 2021)	Ministry of the Environment, Conservation and Parks (MECP)	Enbridge Gas will determine if an EASR or PTTW is required once project design has been finalized. If required, the EASR or PTTW will be obtained prior to any construction dewatering.
Archaeological acceptance under the <i>Ontario Heritage Act</i> (OHA) (amended in January 2023)	Ministry of Citizenship and Multiculturalism (MCM)	A Stage 1 Archaeological Assessment (AA) was submitted to the MCM, however, during review, the MCM identified gaps in the Stage 1 AA and advised additional areas require further review. The consultant has revised the Stage 1 AA to identify and describe these areas and it is currently under internal review. The revised Stage 1 AA will be re-submitted following internal review. A Stage 2 AA will be completed once project design has been finalized.

Permit/Approval	Administering Agency	Status
		Enbridge Gas anticipates receiving archaeological acceptance prior to construction.
Review of Built Heritage and Cultural Heritage Landscapes under the OHA	MCM	A Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment (CHRECPIA) is in progress. The CHRECPIA is expected to be submitted to the MCM for review and comment prior to construction.
Permitting or registration (e.g., O.Reg. 242/08, 830/21) under the <i>Endangered Species Act</i> (ESA) (2007) (amended in October 2021)	MECP	Enbridge Gas will determine if a permit or approval is required through consultation with the MECP once project design has been finalized. If required, Enbridge Gas will obtain the permit or approval prior to constructing in areas afforded protection under the ESA.
Encroachment Permit	Ministry of Transportation (MTO)	Not required.
Development Permit under O.reg 41/24 of the <i>Conservation Authorities Act</i>	Conservation Halton (HRCA)	Enbridge Gas will submit an application once project design has been finalized and will obtain a permit prior to construction in an HRCA regulated area.
Development Permit under O.reg 41/24 of the <i>Conservation Authorities Act</i>	Credit Valley Conservation (CVC)	Enbridge Gas will submit an application once project design has been finalized and will obtain a permit prior to construction in a CVC regulated area.

Permit/Approval	Administering Agency	Status
Road Occupancy Permit- Utility (Municipal Consent)	City of Mississauga	Enbridge Gas will submit an application once project design has been finalized and will obtain a permit prior to construction.
Road Occupancy Permit	Regional Municipality of Peel	Enbridge Gas will submit an application once project design has been finalized and will obtain a permit prior to construction.
Municipal Right of Way Activity Permit By-law	Town of Oakville	Enbridge Gas will submit an application once project design has been finalized and will obtain a permit prior to construction.
Municipal Approvals	Regional Municipality of Halton	Not required.
Noise By-law	Town of Oakville and City of Mississauga	Not applicable; Enbridge Gas will adhere to the relevant noise by-laws.
Tree Conservation By-laws	City of Mississauga	Enbridge Gas will submit an application once project design has been finalized and will obtain a permit prior to construction in a City of Mississauga area.
	Halton Region- Town of Oakville	Enbridge Gas will submit an application once project design has been finalized and will obtain a permit prior to construction in a Halton Region area.
Letter of Opinion	Ministry of Energy and Mines	Enbridge Gas expects to receive the Ministry of Energy and Mines' letter of opinion regarding the sufficiency of consultation closer to the end of record of the proceeding.

Permit/Approval	Administering Agency	Status
Crossing Agreement	Canadian National Railway (CNR)	Enbridge Gas will be submitting an application in the near future and will obtain the approval prior to crossing CNR lands.

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB STAFF

Interrogatory

Reference:

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

Preamble:

The Ministry of Energy and Mines¹ (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.

Question(s):

- 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.

Response:

- a) Please see Attachment 1 to this Exhibit for an updated Indigenous Consultation Report: Summary Table (Attachment 6 to Exhibit H, Tab 1, Schedule 1) as of August 11, 2025, and Attachment 2 to this Exhibit for the Indigenous Consultation Report for consultation activities that occurred between May 1, 2025 to August 11, 2025 (continuation of Attachment 7 to Exhibit H, Tab 1, Schedule 1).

There have been no updates to the consultation activities with the Haudenosaunee Development Institute since the application was filed. Please see the response at Exhibit I.STAFF-11 for more information.

- b) Please see Attachment 3 to this Exhibit.
- c) Enbridge Gas anticipates receiving a Letter of Opinion from the MEM close to the end of the record for the proceeding.
- d) No specific adverse impacts on Aboriginal or treaty rights have been formally identified by Indigenous communities in relation to the Mississauga Reinforcement Project.

INDIGENOUS CONSULTATION REPORT: SUMMARY TABLES

Mississauga Reinforcement Project ("Project")

As of August 11, 2025

Haudenosaunee Development Institute (HDI)		
Was project information provided to the community?	☒ Yes ☐ No	Enbridge Gas has provided HDI with the following information: • Notification Letter, providing an overview of the proposed Project, a list of potential authorizations required, and contact information for the Ministry of Energy and Electrification (ENERGY). • Maps of the Project location. • Notice of Study Commencement Letter (NOC Letter), and open house and Virtual Open House (VOH) information for the Project. The NOC letter contained information on the environmental process • Environmental Report (ER), providing information about the potential effects of the Project on the environment. Enbridge Gas requested community feedback, including any suggestions or proposals for mitigating, avoiding or accommodating any potential impacts the Project may have on Aboriginal or Treaty rights.
Was the community responsive/ did you have direct contact with the community?	☒ Yes ☐ No	Enbridge Gas and HDI have exchanged emails in relation to the Project.
Did the community members or representatives have any questions or concerns?	☐ Yes ☒ No	HDI representatives have not raised any specific questions or concerns about the Project. HDI has advised that they will not be commenting on or reviewing any documents provided by Enbridge, including the Mississauga Reinforcement ER, until there is a signed overarching agreement in place. HDI noted that this would apply to any Enbridge work within HDI treaty territory.
Does the community have any outstanding concerns?	☐ Yes ☒ No	As of August 11, 2025, HDI representatives have not identified any rights-based concerns about the Project. Enbridge Gas will continue to work with HDI should they express any rights-based concerns on the Project.
Huron-Wendat Nation (HWN)		

Was project information provided to the community?	☒ Yes ☐ No	Enbridge Gas has provided HWN with the following information: • Notification Letter, providing an overview of the proposed Project, a list of potential authorizations required, and contact information for ENEGRY. • Maps of the Project location. • NOC Letter, and open house and VOH information for the Project. The NOC letter contained information on the environmental process. • Environmental Report (ER), providing information about the potential effects of the Project on the environment. • Capacity funding agreement provided Enbridge Gas requested community feedback, including any suggestions or proposals for mitigating, avoiding or accommodating any potential impacts the Project may have on Aboriginal or Treaty rights.
Was the community responsive/did you have direct contact with the community?	☒ Yes ☐ No	HWN and Enbridge Gas representatives have exchanged emails regarding the Project.
Did the community members or representatives have any questions or concerns?	☒ Yes ☐ No	HWN expressed concerns to Enbridge Gas on the general timing of Stage 2 Archaeological Assessment (AA) as HWN is of the view it should be completed on all the proposed routes. Enbridge Gas and HWN have met and discussed the rationale for the process. Enbridge Gas will be providing capacity funding to HWN to support their archaeological review of all proposed routes for Enbridge Gas projects.
Does the community have any outstanding concerns?	☐ Yes ☒ No	As of August 11, 2025, HWN representatives have not identified any outstanding concerns. Enbridge Gas will continue to engage with HWN about the Project.
Mississaugas of the Credit First Nation (MCFN)		
Was project information provided to the community?	☒ Yes ☐ No	Enbridge Gas has provided MCFN with the following information: • Notification Letter provided an overview of the proposed Project, a list of potential authorizations required, and contact information for ENERGY. • Maps of the Project location. • NOC Letter, and open house and VOH information for the Project. The letter contained information on the environmental process. • ER, providing information about the potential effects of the Project on the environment.

		Enbridge Gas requested community feedback, including any suggestions or proposals on mitigating, avoiding or accommodating any potential impacts the Project may have on Aboriginal or treaty rights.
Was the community responsive/ did you have direct contact with the community?	☒ Yes ☐ No	MCFN and Enbridge Gas representatives have exchanged emails regarding the Project.
Did the community members or representatives have any questions or concerns?	☒ Yes ☐ No	On February 10, 2025, MCFN provided Enbridge Gas with a response to the Project ER. MCFN's comments included questions on removal of phragmites around Clearview Creek, informing MCFN of any spills, and being a part of the post construction monitoring. Due to an oversight, Enbridge Gas responded to their questions on July 30, 2025. Enbridge Gas advised that the project work would occur in the road allowance and should not interfere with phragmites, but equipment will be cleaned prior to leaving the site if construction is within the proximity to phragmites. Enbridge Gas agreed to provide information on reportable spills and invite MCFN to a post construction walk-through of site conditions.
Does the community have any outstanding concerns?	☐ Yes ☒ No	As of August 11, 2025, MCFN representatives have not identified any outstanding concerns. Enbridge Gas will continue to engage with MCFN on the Project.
Six Nations of the Grand River (SNGR)		
Was project information provided to the community?	☒ Yes ☐ No	Enbridge Gas has provided SNGR with the following information: • The Notification Letter provided an overview of the proposed Project, a list of potential authorizations required, and contact information for ENERGY. • Maps of the Project location. • NOC Letter, and open house and VOH information for the Project. The letter contained information on the environmental process. • ER, providing information about the potential effects of the Project on the environment. • Capacity Funding agreement signed Enbridge Gas requested community feedback, including any suggestions or proposals on mitigating, avoiding or accommodating any potential impacts the Project may have on Aboriginal or treaty rights.

Was the community responsive/ did you have direct contact with the community?	☒ Yes ☐ No	SNGR and Enbridge Gas representatives have exchanged emails and met regarding the Project.
Did the community members or representatives have any questions or concerns?	☒ Yes ☐ No	SNGR advised that the requested timelines for review of the ER may be challenging. SNGR also had questions regarding the impact on trees and the route selection, suggesting SNGR would not have supported the chosen alternative, and expressed concern about the amount of information about the natural environment. Enbridge Gas clarified that feedback could be provided beyond the 42-day comment period and noted the information regarding routes included in the virtual open house slides. Enbridge Gas explained that the Project would be subject to municipal tree by-law permitting and the process for developing protection plans and mitigations to address potential impacts to trees. SNGR requested an EIS and Arborist report so SNGR could have a better understanding of the impacts of the Project on their Aboriginal and Treaty rights. SNGR noted the EIS would need to include a search of animals important to the community and provided a confidential list of plant species that SNGR is concerned with identifying. Enbridge Gas provided information regarding the ER and the OEB Environmental Guidelines. Enbridge Gas advised of the types of studies completed to date and identified information in the Project ER including Section 5: Potential Impacts, Mitigation and Protective Measures and Net Impacts, Section 3.4.2.2.3: Species at Risk, Section 3.4.2.2.4: Significant Wildlife Habitat. The Enbridge Gas representative also advised that a full Significant Wildlife Habitat assessment was completed and provided in the ER. Enbridge Gas explained the ER should identify potential interactions or impacts on species or habitats that may be of importance to SNGR and that the ER provides a comprehensive guide to mitigation measures or recommendations for further studies to limit the impacts to the natural environment. Enbridge Gas noted that comments on the available studies continued to be welcome. In a virtual meeting on June 10, 2025 to discuss the Project, SNGR representatives asked about cumulative effects and Enbridge Gas confirmed post construction monitoring and restoration. SNGR representatives stressed the importance of collecting baseline data for route possibilities and asked how Indigenous perspectives would be incorporated into the route selection process, how often data collected from the Nations changes the route, and if a route had been selected. Enbridge Gas confirmed that the preferred preliminary route identified in the ER is subject to change based on feedback

		received from Indigenous communities, the Ontario Pipeline Coordinating Committee, and other relevant agencies/stakeholders during the review of the draft ER.
Does the community have any outstanding concerns?	☐ Yes ☒ No	As of August 11, 2025, SNGR representatives have not identified any outstanding concerns. Enbridge Gas will continue to engage with SNGR about the Project.

Enbridge Gas Inc. Indigenous Consultation Log
for the Mississauga Reinforcement Project ("Project")
Log updated from May 1, 2025, to August 11, 2025.

Mississaugas of the Credit First Nation ("MCFN")					
Line Item	Date	Method	Summary of Enbridge Gas Inc. ("Enbridge Gas") Consultation Activity	Summary of Community Consultation Activity	Issues or Concerns Raised and Enbridge Gas Responses
2.11	July 7, 2025	Email		An MCFN representative emailed the Stantec and Enbridge Gas representatives to follow up on the status of responses to questions sent February 10, 2025, on the Environmental Report ("ER").	See line-item attachment 2.11.
2.12	July 30, 2025	Email	An Enbridge Gas representative emailed the MCFN representative to apologize for the delay in responding to their questions on the ER. Enbridge Gas indicated they understand MCFN's concern to be that Enbridge Gas's construction activities may result in the spread of phragmites along Clearview Creek. Enbridge Gas advised that it does not anticipate interference with phragmites as construction will occur in the road allowance and if construction does come into proximity of features with phragmites, equipment will be cleaned before leaving the site to avoid the spread of soil containing phragmites. Enbridge Gas indicated it would keep MCFN informed of any reportable spills.		See line-item attachment 2.12.

			Enbridge Gas committed to setting up a post construction walk-through of site conditions with MCFN.		
Six Nations of the Grand River ("SNGR")					
Line Item	Date	Method	Summary of Enbridge Gas Inc. ("Enbridge Gas") Consultation Activity	Summary of Community Consultation Activity	Issues or Concerns Raised and Enbridge Gas Responses
3.29	June 10, 2025	Virtual Meeting	Enbridge Gas representatives met virtually with SNGR representatives to discuss the environmental studies and process for the Project.	SNGR representatives asked about the cumulative effects of the Project. The Enbridge Gas representative confirmed Enbridge Gas conducts post-construction vegetation monitoring at 3 months and 15 months to assess restoration success and identify any deficiencies. The SNGR representative advised that the Project purpose does not matter for cumulative effects and stressed the importance of collecting baseline data for route possibilities. The Enbridge Gas representative advised that the Notice of Upcoming Project ("NUP") comes with a general area map that the Nations can comment on for areas of cultural significance or concerns prior to route selection. Enbridge Gas advised that feedback on the preliminary preferred/alternative routes can also be provided during the review of the draft ER. The SNGR representative asked if Enbridge Gas already had a preferred route, and how they would incorporate Indigenous perspectives. The Enbridge Gas representative advised that the	

				preliminary preferred route does not mean that it has been selected, and is subject to change based on feedback received from Indigenous communities, the Ontario Pipeline Coordinating Committee, and other relevant agencies/stakeholders during the review of the draft ER. The SNGR representative asked how often the data collected from Nations changes the route taken and advised that they are looking for more detailed baseline data. The Enbridge Gas representative advised that all information collected from Nations is considered. The SNGR representatives emphasized the importance of baseline studies before route selection. The SNGR representative advised that they would share their animal list, and both the animal list and plant list could be shared with Stantec.	
3.30	June 20, 2025	Email	An Enbridge Gas representative emailed the SNGR representative to offer capacity funding for the Project and provided a funding letter.		See line-item attachment 3.30.
3.31	June 20, 2025	Email		A SNGR representative emailed the Enbridge Gas representative to return a signed capacity funding letter.	See line-item attachment 3.31.
Huron Wendat Nation (HWN)					
Line Item	Date	Method	Summary of Enbridge Gas Inc. ("Enbridge Gas") Consultation Activity	Summary of Community Consultation Activity	Issues or Concerns Raised and Enbridge Gas Responses

4.16	May 5, 2025	Email		A HWN representative emailed the Enbridge Gas representative to thank them for providing a capacity funding agreement and the written explanation for Enbridge Gas's refusal to complete the Stage 2 Archaeological Assessment (AA) before the ER. The HWN representative advised that they are in discussions with the Ministry of Energy and Electrification to find ways to ameliorate the consultation process as it is their position that the approval authority cannot understand how the proposed activities might have an adverse impact on rights without the information in the Stage 2 AA. The HWN representative advised that a Stage 1 AA is not sufficient to allow HWN to identify potential impacts to archaeological heritage and buried ancestors. The HWN representative advised that the process is preventing HWN from voicing concerns at a key decision moment and advised that they would pause their participation in the consultation process until this is resolved.	See line-item attachment 4.16.
4.17	June 3, 2025	Virtual meeting	Enbridge Gas and HWN met virtually to discuss concerns over the Stage 2 AA timing. Enbridge Gas provided information on how they conduct the AA process as outlined in the Ministry of Citizenship and Multiculturalism guidelines. Enbridge Gas explained that the Stage 2 AA is conducted once the Preliminary Preferred Route (PPR) has been chosen.	HWN advised that capacity funding provided by Enbridge Gas would allow HWN to dedicate resources to participate in the AA of all routes of the Project and would give HWN time and confidence to address any concerns.	

4.18	June 4, 2025	Email	An Enbridge Gas representative emailed the HWN representative to thank them for the virtual meeting the day before and provided an updated capacity funding agreement.		See line-item attachment 4.18.
4.19	June 18, 2025	Email	An Enbridge Gas representative emailed the HWN representative to follow up on the capacity funding agreement provided on June 4, 2025. The Enbridge Gas representative acknowledged the Nation name change from Huron Wendat Nation to Wendat Nation. The Enbridge Gas representative provided an overview of what was discussed in the June 3 rd meeting and asked for confirmation on those points.		See line-item attachment 4.19.
4.20	June 18, 2025	Email		The HWN representative emailed the Enbridge Gas representative to confirm HWNs position regarding a Stage 2 AA. HWN outlined their concern was regarding a route being chosen without the information provided in the Stage 2 AA. HWN wanted to know they would have enough time to voice their concern if anything is discovered during the Stage 2 AA on the chosen route. The HWN representative confirmed that if the proposed capacity funding agreement is renewed annually, they would be able to dedicate more resources to participate and it would give HWN confidence that they will have time to address any concerns that may be raised at a later phase. HWN also informed the Enbridge Gas representative that a new Coordinating Representative will follow up on the capacity funding agreement.	See line-item attachment 4.20.

4.21	June 18, 2025	Email	An Enbridge Gas representative emailed the HWN representative to confirm receipt of their email.		See line-item attachment 4.21.
4.22	August 11, 2025	Email	An Enbridge Gas representative emailed the HWN representative to follow up on the proposed capacity funding agreement provided June 4, 2025, and asked if there were additional questions or concerns.		See line-item attachment 4.22.

Line-item attachment 2.11

From: Lindsay Wong <Lindsay.Wong@mncfn.ca>
Sent: Monday, July 7, 2025 10:52 AM
To: dominique.kelly <dominique.kelly@stantec.com>; Megan DeVries <Megan.DeVries@mncfn.ca>
Cc: Kevin Berube <kevin.berube@enbridge.com>
Subject: [External] Re: Mississauga Reinforcement ER

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Hi Dominique,

Just wondering if you sent a response to these questions. I looked through my emails and didn't think I saw one, but perhaps I missed it.

Thanks, Lindsay

Lindsay Wong, M.Sc.
Manager of Environment



Mississaugas of the Credit First Nation
2789 Mississauga Road, Hagersville, ON, N0A1H0
eb: www.mncfn.ca
Facebook: Mississaugas of the Credit First Nation
Ph: 905-768-4260 Ext: 1601

I choose to work flexibly and am sending this message now because it works for me.
Feel free to read, act on or respond at a time that works for you.

Line-item attachment 2.12

From: [Kevin Recube](#)
To: [Megan DelVos](#)
Cc: [Lindsay Wong](#)
Subject: FW: Mississauga Reinforcement ER
Date: Wednesday, July 30, 2025 9:51:56 AM
Attachments: [image005.png](#)
[image006.png](#)
[image007.png](#)
[image009.png](#)
[image001.png](#)

Good morning Megan,

Apologies for the length of time it took to get these answers back to you. If you have any questions based on the responses let me know and we'll make sure to respond in a timely manner.

Could Enbridge consider the removal of phragmites around Clearview Creek?

We understand MCFN's concern to be that Enbridge Gas's construction activities will result in the spread of phragmites along Clearview Creek. Enbridge Gas does not anticipate interference with phragmites as construction will occur in the road allowance. If Enbridge Gas does come into proximity of features with phragmites, equipment will be cleaned before leaving the site to avoid the spread of soil containing phragmites.

We request that Enbridge keep us informed in case there are any spills.

Yes, Enbridge will keep MCFN informed of any reportable spills.

Is there any potential for MCFN to be involved during the monitoring stage (post-construction)?

Enbridge will commit to setting up a post construction walk-through of site conditions with MCFN.

Meegwetch,
Kevin

Line-item attachment 3.30

From: [Kevin Berube](#)
To: [Lonny Bomberly](#)
Cc: [Peter Graham](#)
Subject: Capacity Funding Mississauga Reinforcement Project
Date: Friday, June 20, 2025 12:22:33 PM
Attachments: [Capacity Funding Letter MRP - Six Nations .pdf](#)

Boozhoo Lonny,

I hope this finds you well.

Realizing the time it takes to review and apply resources to projects we want to offer capacity funding for the Mississauga Reinforcement Project as well. This is separate from the capacity funding for the Port Colborne Reinforcement Project. If agreeable, please sign and send me back a copy of the attached funding letter and we'll get the capacity funding sent out to you. If you have any questions please do not hesitate to reach out.

Have a great weekend!

Meegwetch,
Kevin Berube

Line-item attachment 3.31

From: Peter Graham <LRCS@sixnations.ca>

Sent: Friday, June 20, 2025 1:52 PM

To: Kevin Berube <kevin.berube@enbridge.com>; Lonny Bomberry <lonnybomberry@sixnations.ca>

Subject: [External] RE: Capacity Funding Mississauga Reinforcement Project

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Good afternoon Kevin,

Thank you for the funding offer. Please see the signed letter attached.

Best, Peter

Line-item attachment 4.16

From: Benjamin Labbe <Benjamin.Labbe@wendake.ca>

Sent: Monday, May 5, 2025 2:19 PM

To: Melanie Green <Melanie.Green@enbridge.com>

Cc: Dominique Lesage <Dominique.Lesage@wendake.ca>; Lauryn Graham <lauryn.graham@enbridge.com>; Chloe.Lazakis <Chloe.Lazakis@ontario.ca>

Subject: [External] RE: Huron-Wendat Nation Consultation and Stage 2 Archaeological Assessments - Capacity Funding Agreement

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Kwe Melanie,

Thank you for sending the capacity funding agreement proposition and the written explanation for Enbridge's refusal to complete the Stage 2 archaeological assessment before completion of the ER.

We are currently in discussions with the Ministry of Energy and Electrification to try and find ways to ameliorate the consultation process for hydrocarbon projects because, as mentioned, it is our position that the approval authority cannot understand how the proposed activities may have an adverse impact on our rights without the information contained in a Stage 2 Archaeological Assessment report. **A Stage 1 AA is not sufficient to allow us to identify potential impacts to our archaeological heritage and buried ancestors.** In other words, the process is preventing us from voicing concerns at a key decision moment.

As such, we must pause our participation in the consultation process until these matters are resolved.

Tiawenhk,



NATION HURONNE-WENDAT

Bureau du Nionwentsio

Benjamin Labbé, M. Sc
Conseiller en consultations

255, place Chef Michel Laveau
Wendake (QC) G0A 4V0
T : 418 843-3767
@ : Benjamin.Labbe@wendake.ca

WENDAKE.CA

Line-item attachment 4.18

From: Melanie Green
Sent: Wednesday, June 4, 2025 12:10 PM
To: Benjamin Labbe <Benjamin.Labbe@wendake.ca>
Cc: Dominique Lesage <Dominique.Lesage@wendake.ca>; Lauryn Graham
<lauryn.graham@enbridge.com>; Chloe.Lazakis <Chloe.Lazakis@ontario.ca>
Subject: RE: Huron-Wendat Nation Consultation and Stage 2 Archaeological Assessments - Capacity Funding Agreement

Good morning,

Thank you so much for the chat yesterday, it was much appreciated and educational.
We appreciate and recognize the time it takes to review and participate in project works
and value the input provided.

Please see the attached capacity funding agreement for your review and consideration.

Thank you again,

Mel

Line-item attachment 4.19

De : Melanie Green <Melanie.Green@enbridge.com>

Envoyé : 18 juin 2025 09:13

À : Benjamin Labbe <Benjamin.Labbe@wendake.ca>

Cc : Dominique Lesage <Dominique.Lesage@wendake.ca>; Lauryn Graham <lauryn.graham@enbridge.com>; Chloe.Lazakis <Chloe.Lazakis@ontario.ca>

Objet : RE: Huron-Wendat Nation Consultation and Stage 2 Archaeological Assessments - Capacity Funding Agreement

Good morning,

I would like to make sure you received the revised capacity funding agreement. If you could confirm that would be great.

Thank you for letting us know what Huron Wendat Nation is now Wendat Nation.

I also wanted to include some additional items that we spoke about as reminder -

We heard that Wendat Nation would prefer Enbridge Gas complete a Stage 2 on all routes as WN are interested to identify cultural heritage sites within project area. We also heard that WN feels that the Stage 1 doesn't provide you with enough information to access the rights impacts of the Project.

We discussed and explained process undertaken by Enbridge Gas for Stage 1 and 2.

We also understand that capacity funding would provide opportunity to WN be able to assess the route on your own, without the Stage 2 and determine impacts. Please confirm if we heard this right.

If you have additional concerns and would like to chat more, please let me know.

Thank you,

Mel

Line-item attachment 4.20

From: Benjamin Labbé <Benjamin.Labbé@wendake.ca>
Sent: Wednesday, June 18, 2025 10:46 AM
To: Melanie Green <Melanie.Green@enbridge.com>
Cc: Dominique Lesage <Dominique.Lesage@wendake.ca>; Lauryn Graham <lauryn.graham@enbridge.com>; Chloe Lazakis <Chloe.Lazakis@ontario.ca>
Subject: [External] RE: Huron-Wendat Nation Consultation and Stage 2 Archaeological Assessments - Capacity Funding Agreement

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Kwe Melanie,

Sorry for the delay. Our legal team is reviewing the proposed capacity funding agreement, and we should be able to get back to you promptly. You are correct that it is our position that a Stage 1 AA does not provide enough information to assess if the project risks impacting our rights in regard to archaeological heritage and potential burials. Our fear was that a route would be chosen without this crucial information and that the project would be approved. We feared that after the approval, we would not have enough time or opportunity to voice our concerns if anything is discovered during the Stage 2 AA on the chosen route.

However, if the proposed capacity funding is renewed annually for the duration of the projects, it allows us to dedicate more resources to participate in Enbridge's impact assessment process and gives us confidence that we will have time to address any concerns that may be raised at a later phase. The Stage 2 AA still needs to happen on the chosen route (with field liaison participation) to allow us to identify potential impacts on our rights, but the consultation funding allows us to have staff that are more responsive and that can assess the project more thoroughly. With this reassurance, we would be comfortable with Enbridge's way of proceeding with impact assessment, and we will continue to participate in it to work collaboratively in identifying potential impacts to our rights and find mitigative solutions when applicable.

I also take that this opportunity to inform you that I will be moving on from my role at the Council. Dominique Lesage will now be the Coordinating Representative on our side and she will follow up on the capacity funding agreement.

Önenh chia' tiawenhk



NATION WENDAT
ONYONHWENTSİİO'

Benjamin Labbé
Conseiller en consultations

255, place Chef Michel Laveau
Wendake (QC) G0A 4V0
T: 418 843-3767
@ : Benjamin.Labbé@wendake.ca
WENDAKE.CA

Line-item attachment 4.21

From: Melanie Green
Sent: Wednesday, June 18, 2025 11:08 AM
To: Benjamin Labbe <Benjamin.Labbe@wendake.ca>
Cc: Dominique Lesage <Dominique.Lesage@wendake.ca>; Lauryn Graham <lauryn.graham@enbridge.com>; Chloe Lazakis <Chloe.Lazakis@ontario.ca>
Subject: RE: Huron-Wendat Nation Consultation and Stage 2 Archaeological Assessments - Capacity Funding Agreement

Good morning again,

Thank you for letting me know – I truly appreciate it. I will let the project team know.

Also, congratulations to you and Dominique on your new roles. As always, Dominique is a pleasure 😊 also, Don't be a stranger, I hope that we can still connect.

Chat soon,

Mel

Line-item attachment 4.22

From: Melanie Green

Sent: Monday, August 11, 2025 11:14 AM

To: Benjamin Labbe <Benjamin.Labbe@wendake.ca>

Cc: Dominique Lesage <Dominique.Lesage@wendake.ca>; Lauryn Graham
<lauryn.graham@enbridge.com>; Chloe.Lazakis <Chloe.Lazakis@ontario.ca>

Subject: RE: Huron-Wendat Nation Consultation and Stage 2 Archaeological Assessments - Capacity
Funding Agreement

Good morning,

I am just following up on the below email.

Just wondering if there are additional questions or concerns with what has been
provided.

Thanks again,

Mel

From: Evan Tomek <Evan.Tomek@enbridge.com>

Sent: Friday, May 9, 2025 2:11 PM

To: Lazakis, Chloe (ENERGY) <Chloe.Lazakis@ontario.ca>; McCabe, Shannon (She/Her) (ENERGY) <Shannon.McCabe@ontario.ca>

Cc: Lauren Whitwham <Lauren.Whitwham@enbridge.com>; Tami Showers <Tami.Showers@enbridge.com>; Patricia Squires <Patricia.Squires@enbridge.com>; Olatunbosun Ishola <olatunbosun.ishola@enbridge.com>

Subject: Mississauga Reinforcement Project: ICR

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Good Afternoon Chloe/Shannon,

Today, Enbridge Gas filed its application and pre-filed evidence for the proposed **Mississauga Reinforcement Project**.

I have coordinated with Lauren in her and Tami's absence to provide you with the ICR and ICR Summary Table (both attached).

When you're able please confirm receipt of this email and that you're able to access the attached documents.

If you have any questions in the meantime, please feel free to reach out.

Thanks and have a great weekend!

Evan

Evan Tomek

Senior Advisor, Regulatory Applications – Leave to
Construct
Enbridge Gas Inc.
3840 Rhodes Drive | Windsor, ON N9A 6N7
Cell: 226.229.9588
email: evan.tomek@enbridge.com
**Safety. Integrity. Respect. Inclusion. High
Performance.**

From: McCabe, Shannon (She/Her) (ENERGY) <Shannon.McCabe@ontario.ca>

Sent: Monday, May 12, 2025 5:23 PM

To: Evan Tomek <Evan.Tomek@enbridge.com>; Chloe Lazakis <Chloe.Lazakis@ontario.ca>

Cc: Lauren Whitwham <Lauren.Whitwham@enbridge.com>; Tami Showers <Tami.Showers@enbridge.com>; Patricia Squires <Patricia.Squires@enbridge.com>; Olatunbosun Ishola <olatunbosun.ishola@enbridge.com>

Subject: [External] RE: Mississauga Reinforcement Project: ICR

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Hello, Evan.

Hope all's well. Thanks very much - confirming receipt.

Shannon

From: McCabe, Shannon (She/Her) (MEM) <Shannon.McCabe@ontario.ca>

Sent: Thursday, July 10, 2025 9:55 AM

To: Olatunbosun Ishola <olatunbosun.ishola@enbridge.com>; Lauren Whitwham <lauren.whitwham@enbridge.com>; Patricia Squires <patricia.squires@enbridge.com>; Evan Tomek <evan.tomek@enbridge.com>; Melanie Green <melanie.green@enbridge.com>; Tami Showers <tami.showers@enbridge.com>

Cc: Lazakis, Chloe (MEM) <Chloe.Lazakis@ontario.ca>; Boucher, Marc (MEM) <Marc.Boucher@ontario.ca>; Ferguson, Hilary (MEM) <Hilary.Ferguson@ontario.ca>; Woodhouse, Michelle (MEM) <Michelle.Woodhouse@ontario.ca>; Gibson, Amy (MEM) <Amy.Gibson@ontario.ca>; Adkar, Samir (MEM) <Samir.Adkar@ontario.ca>

Subject: Enbridge-MEM Monthly Update Meeting

Good morning Enbridge team,

Thank you for the great discussion the other week. For today's meeting, we've proposed the following agenda. Please let us know if you have anything to add or change.

Proposed agenda:

- Active projects in 'sufficiency' phase *[see chart below]*
 - o Glendale
 - o East Gwillimbury
 - o Boblo Island
 - o Mississauga Reinforcement
- ER reviews for OPCC reps
 - o Washago – *staff review underway*
 - o Humber Station Road - *staff review underway*
 - o Lanark and Balderson - *staff review underway*
- Other active projects
 - o Port Colborne:
 - HDI and Six Nations
- Upcoming projects
 - Remaining NGEP Phase 2 projects
 - New projects under new regulations (pipeline relocation and reconstruction projects)
 - Others
- All other business

As we discussed on our last call, we put together the following chart that outlines where our team is at with each project, as well as some questions we have on the consultation records (some of which we've raised previously).

Project	Status of review	Questions for Enbridge
Glendale	Ministry is aware that MCA and Enbridge have differing positions on the status of consultation; and acknowledge that Enbridge is working with MCA. Given MCA's view (as outlined in its May 27, 2025 letter filed with OEB) that it has not yet been adequately consulted, and because MCA has indicated the project has the potential for impacts to rights, the ministry is not in a position to issue letter of opinion yet.	<u>Mohawk Council of Akwesasne</u>: In its filings to the OEB, MCA has noted concerns about fishing (given proximity to the St. Lawrence) as well as potential for impacts to wildlife and plants. Does Enbridge have any updates on any recent dialogue or meetings with MCA regarding the rights-based concerns raised and potential mitigations, if any? Were Enbridge's responses to MCA's questions about Black Ash, native grasses and excess soil satisfactory to MCA?
East Gwillimbury	Review underway/ nearing completion. Mississaugas of Scugog Island First Nation (MSIFN) advised the Ministry that they require time to review Enbridge's May 28, 2025 response and to determine if there are any outstanding rights-based concerns. Our team has followed up with MSIFN inquiring about a general timeline on when they expect to complete their review so the Ministry can aim to set up a conversation in advance of that.	<u>Alderville First Nation</u>: AFN contacted the Ministry and expressed concern that draft stage 1 AAs are not shared with the community, and therefore the community is not able to provide early feedback. MSIFN noted that arch assessments may not always proceed to Stage 2, in which case they would not have a chance to comment or raise concerns. - Is it possible for Enbridge to accommodate Alderville's request to comment on the draft stage 1 AAs before they are filed as part of the Environmental Report? - Could this request to share draft AAs be accommodated in some way for future projects? [This seems to be a recurring question / concern from multiple communities]

Boblo Island	Our team continues its review, including working with MEM legal counsel on claim issue. MEM continues to wrap up final calls/meetings. Ministry has a meeting scheduled with Chippewas of Kettle and Stony Point First Nation on July 21.	Any updates from Enbridge on any recent discussions with any of the communities? <u>Aamjiwnaang (AFN):</u> • Enbridge provided responses to AFN regarding AFN's comments on the Environmental Report. Did AFN acknowledge if those responses/ mitigations were satisfactory? ICR did not indicate. • In the ICR, a few communities, including AFN, asked about alternative routing, and Enbridge responded indicating that alternate routing wasn't considered given existing infrastructure. In the reply submission to the OEB, Enbridge noted: <i>"Enbridge Gas retained Stantec Consulting Ltd. (Stantec) to undertake a route evaluation and environmental and socio-economic impact study, which included a cumulative effects assessment and a Stage 1 Archaeological Assessment, to select the preferred route for the Project."</i> Can Enbridge provide more information. Was a route selection process undertaken? <u>Caldwell:</u> • CFN requested that there be ongoing testing and monitoring of aquatic habitats and aquatic life during the construction phase, and requested to review and comment on a plan. Enbridge did not agree and proposed to share its HDD Sediment Control Plan with CFN and to work with CFN on involving CFN monitors during
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		turbidity monitoring and sharing of reports. Has Enbridge received any comments from CFN on that approach? • CFN requested that tree sweeps be conducted 48 hours before construction. Enbridge indicated it would conduct sweeps 7 days prior. Has Enbridge received any comments from CFN on this approach? <u>Walpole Island First Nation:</u> • In response to WIFN's comments/questions, Enbridge made several commitments (ie fieldwork monitor opportunities; updating the Cultural Heritage Screening Checklist to indicate the presence of a Canadian Heritage Rivers; planting trees at a ratio of 3:1; consulting with WIFN if work to take place during Bald Eagle avoidance window; and habitat improvement, etc). • Has Enbridge received any comments from WIFN in response?
Mississauga Reinforcement	Ministry's sufficiency assessment underway and dialogue and meetings with communities in progress. Ministry acknowledges Enbridge's path forward with Wendat Nation re archaeological concerns.	<u>Mississaugas of the Credit First Nation:</u> As outlined in the ICR, MCFN reviewed the ER and had three questions/ comments for Enbridge: • Requested the removal of phragmites near Clearview Creek • Requested that Enbridge keep them apprised in case of any spills • Is there potential for MCFN to be involved in post-construction monitoring?

		The ICR did not include if/how Enbridge responded to those comments. Could Enbridge provide an update? <u>HCCC</u>: The ICR notes that HCCC requested an agreement be in place before consultation is initiated. Have any consultations taken place with HCCC to date? ICR does not indicate. Has HCCC raised any specific rights-based concerns? <u>Six Nations</u>: As previously raised with Enbridge, Six Nations has concerns about what it perceives as a lack of requisite environmental studies on the project, as well as a lack of inclusion about plants of importance to Six Nations, animals of importance, and concerns about tree removal and routing, among other concerns. Does Enbridge have any updates on any recent meetings with Six Nations? Any resolution on their concerns?
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Looking forward to our meeting today.

Best regards,

Shannon McCabe (she/her)

Manager, Strategic Indigenous Initiatives

Ministry of Energy and Mines



From: Lazakis, Chloe (MEM) <Chloe.Lazakis@ontario.ca>

Sent: Friday, July 25, 2025 1:03 PM

To: Lauren Whitwham <Lauren.Whitwham@enbridge.com>; Patricia Squires <Patricia.Squires@enbridge.com>

Cc: McCabe, Shannon (She/Her) (MEM) <Shannon.McCabe@ontario.ca>; Ferguson, Hilary (MEM) <Hilary.Ferguson@ontario.ca>

Subject: [External] question about Mississauga Reinforcement Project

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This email was sent from chloe.lazakis@ontario.ca.

Good afternoon!

How are you doing this muggy, hot Friday? Lauren and Patricia, in addition to yourselves, could you please help us route this email? If it would be helpful for me to directly connect with Kevin B. I'm also more than happy to do so! I'm copying Shannon and Hilary who have also been engaged on the file.

Acknowledging you're working on responses to the questions below, and that they were only shared recently, I thought it's better to keep the lines of communication open, as we discussed earlier this week.

The team has been in communication with Mississaugas of the Credit First Nation recently regarding the Mississauga Reinforcement Project. The Dept. of Consultation and Accommodation indicated that the community was awaiting a response from Enbridge on its comments about the project that were originally submitted in Feb. and for which a follow up was sent in June.

Could you please look into MCFN's comments? We'd like to respond to the DOCA with an update.

Thank you in advance!

Have a good weekend and we'll stay connected,
Chloe

From: Lauren Whitwham <Lauren.Whitwham@enbridge.com>

Sent: Friday, July 25, 2025 1:24 PM

To: Lazakis, Chloe (MEM) <Chloe.Lazakis@ontario.ca>; Patricia Squires <Patricia.Squires@enbridge.com>

Cc: McCabe, Shannon (She/Her) (MEM) <Shannon.McCabe@ontario.ca>; Ferguson, Hilary (MEM) <Hilary.Ferguson@ontario.ca>

Subject: RE: question about Mississauga Reinforcement Project

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Thanks Chloe,

I have followed up with Kevin to ensure he let MCFN know that we are working on these. We should have them out next week.

It seems that these questions were missed and we are working on them as we speak.

Thank you for reaching out.

Lauren

From: Lazakis, Chloe (MEM) <Chloe.Lazakis@ontario.ca>
Sent: Friday, July 25, 2025 1:35 PM
To: Lauren Whitwham <Lauren.Whitwham@enbridge.com>
Subject: [External] RE: question about Mississauga Reinforcement Project

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This email was sent from Chloe.Lazakis@ontario.ca.

Thanks Lauren Take care!

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB STAFF

Interrogatory

Reference:

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.

Question(s):

- 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.

Response:

- a) Enbridge Gas has received no further correspondence from HDI on the Project. HDI has not raised any rights-based concerns.
- b) The overarching agreement referenced by HDI is not specific to the Project. HDI is seeking a Cumulative Impact Acknowledgment and Benefit Agreement which would include compensation for cumulative past and future impacts. As expressed to HDI

in an email on March 6, 2023, Enbridge Gas is of the position that any cumulative impact compensation requires broader discussion with federal and provincial government representatives and other stakeholders, including the elected leadership at Six Nations of the Grand River and other First Nations with overlapping territories.

HDI and Enbridge Gas were scheduled to meet in late-2024 to re-establish discussions regarding HDI's concerns with Enbridge Gas and its assets in Ontario. This meeting was cancelled by HDI. HDI has not responded to Enbridge Gas's subsequent requests to schedule another meeting.

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB STAFF

Interrogatory

Reference:

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.

Question(s):

- 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.

Response:

- a) Please see Attachment 2 to Exhibit I.STAFF-10, line-item attachment 2.12 for Enbridge Gas's responses to the comments/requests of MCFN.
- b) Please see Attachment 2 to Exhibit I.STAFF-10, line items 2.11 and 2.12 (including line-item attachments 2.11 and 2.12) for an update on consultation activities undertaken with respect to MCFN since the application was filed. Enbridge Gas will continue to engage with MCFN on the Project.

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB STAFF

Interrogatory

Reference:

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.

Question(s):

- 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.

Response:

- a) Enbridge Gas held a meeting with SNGR on June 10, 2025 to provide details on how Enbridge Gas conducts the environmental studies in line with the OEB's Environmental Guidelines, and to address any concerns regarding the Project.

A summary of this meeting can be found at Attachment 2 to Exhibit I.STAFF-10, line item 3.29.

- b) Please see Attachment 2 to Exhibit I.STAFF-10, line items 3.29 – 3.31 (including line-item attachments 3.30 and 3.31) for an update on the consultation activities undertaken with respect to SNGR since the application was filed.

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB STAFF

Interrogatory

Reference:

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.

Question(s):

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.

Response:

- a) Due to an oversight/clerical error by Enbridge Gas, the draft Environmental Report was sent to HWN later in the process. Enbridge Gas provided HWN with at least the same amount of time as HDI, SNGR and MCFN to review and comment on the draft Environmental Report.
- b) HWN did not provide Enbridge Gas with any comments regarding the draft Environmental Report, despite Enbridge Gas following up with HWN multiple times (please see Exhibit H, Tab 1, Schedule 1, Attachment 7, line items 4.8 – 4.10, 4.13, and 4.15).
- c) Enbridge Gas has provided HWN with a capacity funding agreement for this project, among others. The purpose of the capacity funding is to provide HWN with resourcing to enable it to do a thorough review of all the alternative routes. The capacity funding agreement is currently with HWN for legal review and signature.
- d) Please see Attachment 2 to Exhibit I.STAFF-10, line items 4.16 – 4.22 (including line-item attachments 4.16, and 4.18 – 4.22) for an update on any consultation activities undertaken with HWN since the application was filed.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence

Interrogatory

Reference:

Exhibit B

Question(s):

- (a) Enbridge indicates that the project will reduce greenhouse gas emissions. Please provide an estimate of the greenhouse gas emissions reductions that will be achieved based on the contracted gas quantities. Please account for both fuel substitution (i.e. substituting gas for a different fuel with a different carbon intensity) and incremental gas use that does not replace use of other fuels. Please provide all calculations, inputs, and assumptions. Please provide a response on an approximate, best-efforts basis, noting caveats where necessary.
- (b) Please provide a revised version of the response to (a) which accounts for the upstream greenhouse gas emissions attributable to use of methane gas. We recommend using the default emissions factors underlying the clean fuel standard, which can be found in the evidence of the ongoing Enbridge rebasing case.

Response:

a) – b)

Information related to anticipated environmental benefits as a result of the Project was provided by Petro-Canada Lubricants Inc. (“Petro-Canada”) and Ash Grove, a CRH Canada Group Inc. company (“CRH Canada”) in their respective letters of support for the Project.¹ Specifically, only Petro-Canada provided estimates on its anticipated greenhouse gas (GHG) emission reductions as a result of the Project.² Enbridge Gas does not have any further information on the GHG savings beyond what has been provided in the letter from Petro-Canada.

¹ Exhibit B, Tab 1, Schedule 1, Attachment 1 and Attachment 2.

² Exhibit B, Tab 1, Schedule 1, Attachment 1.

Enbridge Gas suggests that seeking this information from CRH Canada and CertainTeed Canada Inc. (who did not provide information related to its anticipated GHG reductions), would not be of assistance to the OEB in approving this Project. This Application is set to follow the OEB standard issues list for an LTC application, and the information being sought is out of scope and not relevant to determine whether the Project is in the public interest. The Project is proposed to accommodate the customers' requests for incremental natural gas service³ and is supported by multiple municipalities and various local associations⁴.

Furthermore, the OEB is limited to the regulation of the delivery, storage and supply of natural gas. Other than its objective to promote energy efficiency, the OEB does not regulate the utilization of natural gas or any effects arising from its use, and further still, the quantification of anticipated GHG emissions from a customer's site is out of scope of the OEB's *Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th Edition, 2023* and therefore was not included within the Environmental Report.

³ Exhibit B, Tab 1, Schedule 1, para. 8.

⁴ Exhibit B, Tab 1, Schedule 1, Attachments 4 – 11.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence

Interrogatory

Reference:

Exhibit C

Question(s):

- (a) Enbridge ruled out three alternatives due to a lack of available land: rebuilding the station at Winston Churchill Boulevard and Royal Windsor Drive and constructing new stations in Oakville (Alternative 1) or Mississauga (Alternative 2). Please provide a high-level approximate cost difference between the chosen alternatives and each of those three alternatives, excluding the cost to purchase the required land.
- (b) Did Enbridge offer landowners an amount equal or close to the savings that would accrue to ratepayers by selecting one of the alternatives noted in (a)? If not, why not, and what amount was offered?

Response:

- a) Enbridge Gas assessed alternatives based on established assessment criteria with consideration of economic feasibility, timing, safety & reliability, risk management and environmental & socio-economic impact.

The Preliminary Preferred Route (the proposed Project) was estimated to cost approximately \$16.5 MM in direct capital costs at the Class 5 level and was reduced to approximately \$14.5 MM at the Class 4 level. All other alternatives were more expensive, or inexecutable, as explained below.

The rebuild of the existing natural gas distribution station at the northeast quadrant of the Winston Churchill Boulevard and Royal Windsor Drive intersection that would also be required for Alternative Routes 1 and 2 was estimated to cost approximately \$8.7 MM in direct capital costs at the Class 5 level.

As described in Exhibit C, Tab 1, Schedule 1, the new distribution station would require a 40 x 40 metre footprint and could not be rebuilt on the existing footprint. The existing station was constructed within the municipal road allowance, and it is not feasible to expand the station at its current location due to limited space within the road allowance and adjacent landowners being unwilling to sell Enbridge Gas property based on outreach conducted by Enbridge Gas.¹

Alternative Routes 1 and 2 are shown in Figure C-2 at Appendix C of the Environmental Report². For Alternative Routes 1 and 2, sites for a new station were considered within reasonable proximity to the proposed tie-in locations to minimize the length of pipe required to connect to the station. As the location of a potential new station moves farther away from the tie-in locations, the required length of pipeline increases. Therefore, for Alternative Routes 1 or 2 to be viable, the new station must be in a specific area close to the Winston Churchill Boulevard and Royal Windsor Drive intersection. The area is urban and highly developed and extensive outreach with landowners did not yield a suitable parcel of land.³ Enbridge Gas also considered that further investigation into land options and the required time for negotiations would put the project schedule at risk. Furthermore, Enbridge Gas was aware that a property in the area being investigated had sold recently for over \$9 MM. Excluding the cost to construct pipelines to connect the new distribution station, this land cost, combined with the \$8.7 MM estimate in direct capital costs for the new station, would have made these alternatives more expensive than the proposed Project at approximately \$17.7 MM. Enbridge Gas did not complete a cost estimate for the pipeline portion as no suitable location for a new station was determined.

- b) Enbridge Gas did have discussions with landowners but no formal offers were made given the fair market value for the lands would have made the alternatives more expensive than the proposed Project.

¹ Exhibit C, Tab 1, Schedule 1, para. 4.

² Exhibit F, Tab 1, Schedule 1, Attachment 1.

³ Exhibit C, Tab 1, Schedule 1, para. 5.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence

Interrogatory

Reference:

Exhibit C

Question(s):

- (a) What alternative pipeline materials were explored by Enbridge in designing this project?
- (b) Based on the best information currently available to Enbridge, what pipeline materials are best suited for carrying 100% hydrogen? Please discuss and provide links to supporting materials.
- (c) Approximately what would the cost and the profitability index for the project be if pipeline materials most likely to be appropriate for carrying 100% hydrogen were used?
- (d) Approximately what would the cost and the profitability index for the project be if polyethylene pipes were used (and other adjustments made to allow for that material)?
- (e) Please provide a table listing all infrastructure and components that Enbridge plans to build via this project with a column showing the likely suitability for 100% hydrogen.
- (f) What additional steps can be taken to ensure, or at least increase the likelihood, that the infrastructure being installed will be compatible with 100% hydrogen.
- (g) Please discuss the potential role for 100% hydrogen in decarbonizing industrial uses, including those that are difficult to decarbonize.
- (h) Do any of the customers along the relevant pipeline use gas for high-heat or other processes that are difficult to decarbonize through electrification?

Response:

- (a) Based on the suitability for natural gas, cost, a design pressure of 1,900 kPa, and the requirement to meet applicable codes, standards and Enbridge Gas's

established operating procedures, the preferred pipe option was carbon steel as opposed to other metallic and non-metallic materials. Other pipeline materials were not deemed feasible by Enbridge Gas.

- (b) As identified in EB-2022-0200, Exhibit 4, Tab 2, Schedule 6, Page 16 of 20, Enbridge Gas is currently undertaking a full evaluation of its natural gas grid in Ontario under the Hydrogen Blending Grid Study ("Grid Study"). The Grid Study evaluates the major aspects of the natural gas grid system's readiness to accept hydrogen. The Grid Study commenced in Q3 2024, and Enbridge Gas will provide an interim report to the OEB in Q3 2025 that includes an update on progress and preliminary findings.
- (c) Please see the response to part b). The outcome of the aforementioned Grid Study will better inform Enbridge Gas on the approximate cost implications for projects with future hydrogen readiness provision.

The purpose of the Project is to accommodate three customers' requests for incremental natural gas service. Enbridge Gas has executed long-term firm service contracts with these customers, and therefore it is Enbridge Gas's position that the consideration of pipeline materials capable of carrying 100% hydrogen is not relevant to this proceeding. Moreover, if the new pipe were to be designed for 100% hydrogen service, an engineering assessment and subsequent modifications of the entire network would still be required for 100% hydrogen conversion, which is outside the scope of this proceeding.

- (d) Polyethylene pipe is not rated for an operating pressure of 1,900 kPa. Therefore, polyethylene pipe was not a viable option for this project.
- (e) – (f)

Please see the response to parts b) and c).

- (g) As set out in the recently published *Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7*, hydrogen is a critical tool to reduce emissions in hard-to-abate sectors where electrification is not technically or economically feasible with current technologies.¹ However, the potential role for 100% hydrogen in decarbonizing industrial uses is hard to assess in general terms. Both the availability and affordability of hydrogen remain factors before any

¹ [Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7, p. 112.](#)

customer would be willing to use it in place of natural gas. Further, customers' energy needs are unique and are driven by their industry sector, their processes, and the market conditions in which they operate. These considerations are brought to bear on decisions involving new energy-related investments and alternatives. For a number of sectors, fossil fuels are both a feedstock and fuel, limiting the ability to completely switch away from fossil fuels. As well, certain industrial processes require high-temperature heat that only certain equipment and fuels can provide. As noted above, Enbridge Gas continues to study the potential uses of hydrogen in this respect.

- (h) To the best of Enbridge Gas's knowledge, the customers along the proposed pipeline use both high-heat and other applications which is why they have requested an increase in supply of natural gas. To date, the customers have not discussed electrification with Enbridge Gas.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence

Interrogatory

Reference:

Exhibit E

Question(s):

- (a) It appears that incremental revenue is only accruing in years 1 to 9 in the DCF tables. This presumably corresponds to the signed distribution contracts. Is that correct? If not, please explain.
- (b) Does Enbridge anticipate that at least some of the volumes will be recontacted at the end of the relevant contract terms? If yes, approximately what percent?
- (c) In light of the above, does Enbridge believe that the project economics are represented conservatively for this project?
- (d) Please reproduce the DCF table using Enbridge's best estimate of the incremental revenue that will arise from this project, including incremental revenue that is not guaranteed by a firm contract?

Response:

- a) Yes, that is correct.
- b) Yes, Enbridge Gas anticipates that capacity requirements will remain at 100% at the end of the relevant contract terms.
- c) Yes, Enbridge Gas believes the project economics are represented conservatively for this project.
- d) Enbridge Gas expects customers to recontract beyond their current contract terms. Please see Attachment 1 to this Exhibit for the updated DCF analysis that includes the full 20-year term allowed for contract customers (although there is no firm expectation of contract duration). The information is indicative of incremental

revenues associated with the maximum period as allowed under E.B.O. 188 methodology.

Mississauga Reinforcement InService Date: Nov-01-2026 Economic Feasibility Parameters and Results			
Discounting Assumptions			
Project Time Horizon		20 years	
Discount Rate		Incremental After Tax Cost of Capital of 5.60%	
Key DCF Input Parameters, Values and Assumptions			
<u>Operating Cash Flow</u>			
Revenue:			
Incremental Distribution Revenues		Rates as per EB-2024-0111 Effective January 1 2025	
Expenses:			
Operating and Maintenance Expense		Estimated incremental costs	
Municipal Tax		Estimated incremental cost	
Income Tax Rate		26.5%	
<u>Capital Expenditures</u>		<u>Capital (\$000's)</u>	
Gross Capital Costs		14,903	
Working Capital:			
O&M (net leg days)		(5.1)	
<u>CCA Tax Shield</u>			
CCA Rates:			
CCA Classes:	CCA Class	CCA Rate	Declining balance rates by CCA class
Distribution/Reinforcement Mains	51	6%	Accelerated CCA (Bill C-97) included.
Customer Services & MRI	51	6%	
Feasibility Results			
Economic Feasibility		<u>NPV (\$000's)</u> 33,184	<u>PI</u> 3.26

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence

Interrogatory

Reference:

Exhibit E

Question(s):

- a) Please reproduce the DCF analysis listing actual years (instead of 1, 2, 3, ...). Please also exclude the operating cash flow figures (revenue and operating expenses) from the years that are within the current rate term.
- b) Please confirm that the revenues and operating costs occurring during this rate term will only accrue to existing ratepayers as benefits or costs to the extent that the earnings sharing mechanism is triggered in those years. Please discuss.

Response:

- a) Please see Attachment 1 to this Exhibit for the Discounted Cash Flow (DCF) analysis listing actual years.

The DCF analysis presented in Exhibit E, Tab 1, Schedule 1, Attachment 2 adheres to the methodology prescribed by the Ontario Energy Board for conducting feasibility assessments under E.B.O. 188. This methodology is applied consistently across all project evaluations, regardless of the applicable regulatory framework.

As such, Enbridge Gas declines to reproduce the DCF analysis as the request to exclude operating cash flows from the DCF analysis during the current Incentive Regulation term does not comply with the established regulatory requirements.

- b) Confirmed. During the current price cap term, where the establishment of updated annual rates are not tied to an updated forecast of revenues or costs, incremental revenues and costs attributable to the Mississauga Reinforcement Project will only impact existing ratepayers to the extent they contribute or detract from any potential earnings sharing amount resulting from the approved earnings sharing mechanism.

Mississauga Reinforcement InService Date: Nov-01-2026 Economic Feasibility Parameters and Results			
Discounting Assumptions			
Project Time Horizon		20 years	
Discount Rate		Incremental After Tax Cost of Capital of 5.60%	
Key DCF Input Parameters, Values and Assumptions			
<u>Operating Cash Flow</u>			
Revenue:			
Incremental Distribution Revenues		Rates as per EB-2024-0111 Effective January 1 2025	
Expenses:			
Operating and Maintenance Expense		Estimated incremental costs	
Municipal Tax		Estimated incremental cost	
Income Tax Rate		26.5%	
<u>Capital Expenditures</u>		<u>Capital (\$000's)</u>	
Gross Capital Costs		14,903	
Working Capital:			
O&M (net leg days)		(5.1)	
<u>CCA Tax Shield</u>			
CCA Rates:			
CCA Classes:	CCA Class	CCA Rate	Declining balance rates by CCA class
Distribution/Reinforcement Mains	51	6%	Accelerated CCA (Bill C-97) included.
Customer Services & MRI	51	6%	
Feasibility Results			
Economic Feasibility		<u>NPV (\$000's)</u> 2,546	<u>PI</u> 1.17

Project Year		(\$000's)	Project Total	Nov 1 2026 -	Nov 1 2027 -	Nov 1 2028 -	Nov 1 2029 -	Nov 1 2030 -	Nov 1 2031 -	Nov 1 2032 -	Nov 1 2033 -	Nov 1 2034 -	Nov 1 2035 -
				Oct 30 2027	Oct 30 2028	Oct 30 2029	Oct 30 2030	Oct 30 2031	Oct 30 2032	Oct 30 2033	Oct 30 2034	Oct 30 2035	Oct 30 2036
Operating Cash Flow													
Revenue:													
Distribution Revenue	26,514	5,367	5,367	4,962	1,803	1,803	1,803	1,803	1,803	1,803	1,803	-	-
Expenses:													
O & M Expense	(1,547)	(77)	(77)	(77)	(77)	(77)	(77)	(77)	(77)	(77)	(77)	(77)	(77)
Municipal Tax	(200)	(10)	(10)	(10)	(10)	(10)	(10)	(10)	(10)	(10)	(10)	(10)	(10)
Income Tax	(6,494)	(1,330)	(1,399)	(1,292)	(455)	(455)	(455)	(455)	(455)	(455)	(455)	23	
Net Operating Cash Flow	18,273	3,950	3,880	3,583	1,261	1,261	1,261	1,261	1,261	1,261	1,261	(64)	
Capital													
Incremental Capital	(14,903)	(14,903)	-	-	-	-	-	-	-	-	-	-	-
Change in Working Capital	1	1	-	-	-	-	-	-	-	-	-	-	-
Total Capital	(14,901)	(14,901)	-	-	-	-	-	-	-	-	-	-	-
CCA Tax Shield													
CCA Tax Shield	3,338	244	218	205	193	181	170	160	150	141	133		
Net Present Value													
PV of Operating Cash Flow	15,209	3,723	3,464	3,029	1,009	956	905	857	812	769	(37)		
PV of Capital	(14,667)	(14,667)	-	-	-	-	-	-	-	-	-	-	-
PV of CCA Tax Shield	2,003	230	195	173	154	137	122	109	97	86	77		
Total NPV	2,546	(10,713)	3,659	3,202	1,164	1,093	1,027	966	909	855	40		
Project NPV		2,546											
Profitability Index													
Cumulative PI	0.270.520.740.820.890.961.031.091.151.15												
Project PI	1.17												

