



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

August 29, 2025

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

Dear Mr. Murray:

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

Pursuant to Procedural Order No. 4, Enbridge Gas hereby submits responses to the supplemental information requests submitted by Ontario Energy Board staff and Climate Network Lanark.

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

Yours truly,

Patrick McMahon
Technical Manager
Regulatory Research and Records
patrick.mcmahon@enbridge.com
(519) 436-5325

cc: (email only)

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

ENBRIDGE GAS INC.

Response to Interrogatory from
OEB Staff

Reference: Application, page 1, para 2

Preamble:

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

Original Questions:

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

Supplemental Question:

In respect of interrogatories EGI-OEB-2, Enbridge Gas shall provide the number of prospective customers and their general location (including whether they are inside or outside the expanded area that Enbridge Gas seeks to add to the certificate), and a map showing the location of any service requests or planned infrastructure.

Original Response:

- a) On June 9, 2021, the Ministry of Energy, Northern Development and Mines announced which projects would receive financial assistance through Phase 2 of the Natural Gas Expansion Program (NGEP). One of the projects that received NGEP financial assistance will provide access to natural gas distribution service in the community of Lanark within the Township of Lanark Highlands and in the community of Balderson within the Township of Drummond / North Elmsley.

- i – iii While the scope of the Lanark / Balderson community expansion project is still under review, the proposed project currently includes some pipe being installed within the Township of Tay Valley that could potentially provide access to natural gas to residential, commercial and agricultural service locations. There are also potential customers along the west side of a proposed supply pipeline for the Lanark / Balderson community expansion project along Highway 511 that would be located with the Township of Tay Valley.
- iv. The proposed Lanark / Balderson community expansion project will require a leave to construct application.
- v. Pipe currently proposed to be constructed within the Township of Tay Valley as part of the Lanark / Balderson community expansion project is expected to be constructed along roads under the jurisdiction of the County of Lanark so the requirement to receive authorization from the Township of Tay Valley may be limited.

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

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

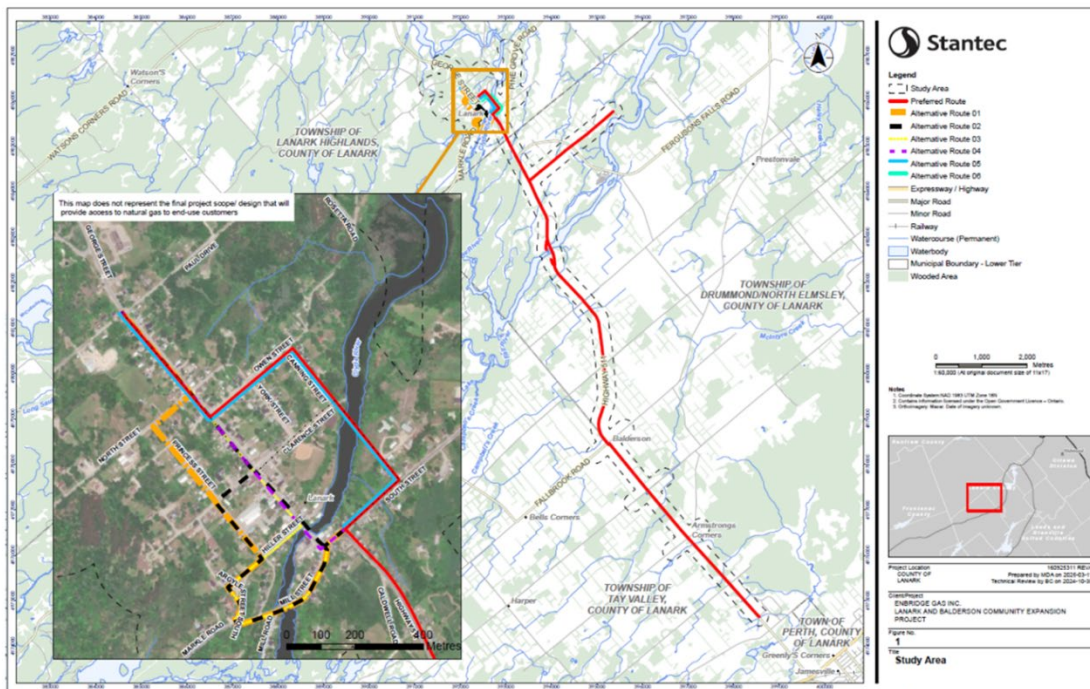
- g. Work in Right-of-Way Permit from the County of Lanark for construction work in the Right-of-Way in the County of Lanark.
- h. Tree Conservation By-Law permit from the County of Lanark required for injury, removal or destroyed woodlots that are two hectares or more in an individual Roll Number.

Supplemental Response:

Given the location of Tay Valley Township, its rural make-up and the location of Enbridge Gas' facilities within the municipality, it is not likely that there will be many requests for service connections within Tay Valley Township in the foreseeable future.

As part of the proposed Lanark and Balderson Community Expansion Project, while the project scope is still under review, the current scope includes up to 500m of NPS 2 plastic gas main being constructed on Fallbrook Road in Tay Valley Township with 4 potential customers (2 residential, 1 commercial (church) and 1 agricultural property with a medium/large sized grain drier). These service locations would be contained within areas of Tay Valley Township covered by Enbridge Gas' current CPCN.

See the attached map of the proposed Lanark and Balderson community expansion project which shows approximately 18 potential customers within Tay Valley Township. Enbridge Gas does not have a map denoting any potential customers in Tay Valley Township other than for this project.



ENBRIDGE GAS INC.

Response to Interrogatory from
Climate Network Lanark

Original Questions:

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

Supplemental Questions:

- a) How far away (in km) is the closest Enbridge pipeline to the closest point in the Former Township of Burgess? If the pipeline in question is not already illustrated on a map, please provide a map doing so.
- b) How far away (in km) is the closest Enbridge pipeline to the closest point in the Former Township of South Sherbrooke? If the pipeline in question is not already illustrated on a map, please provide a map doing so.
- c) Please provide a rough and approximate cost to construct a km of pipeline based on past pipeline projects in this area or in Enbridge service territory more generally.
- d) Based on the distances in (a) and (b) and the cost in (c), please comment on the likelihood that customers in the former townships of South Sherbrooke and Burgess would have the demand necessary to make a line extension cost-effective.
- e) Please provide an aerial map showing the land use in the expanded areas that are closest to Enbridge pipelines (i.e. the northern portion of the former township of Burgess).
- f) This appears to be a low-density rural area. Does Enbridge agree?

Original Response:

- a) As noted in the Application, Enbridge Gas has a CPCN issued by the Ontario Fuel Board dated August 25, 1960 (F.B.C. 316) for the former Township of Bathurst. The current Township of Tay Valley also includes the former Township of South Sherbrooke and the former Township of North Burgess. Please see Attachment 1.
- b) Please refer to Schedule A of the application for the location of Enbridge Gas' infrastructure within the Township of Tay Valley. Please also refer to the response at Exhibit EGI-Staff-2.

- c) The Application is not being brought in respect of any specific approval to construct works. As noted by the OEB in Procedural Order No. 2, Enbridge Gas has submitted a request to approve a new CPCN for the Township of Tay Valley to align the existing CPCN with current municipal boundaries in accordance with the direction from the OEB as described in section 3.6.2 of the *Natural Gas Facilities Handbook*.

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

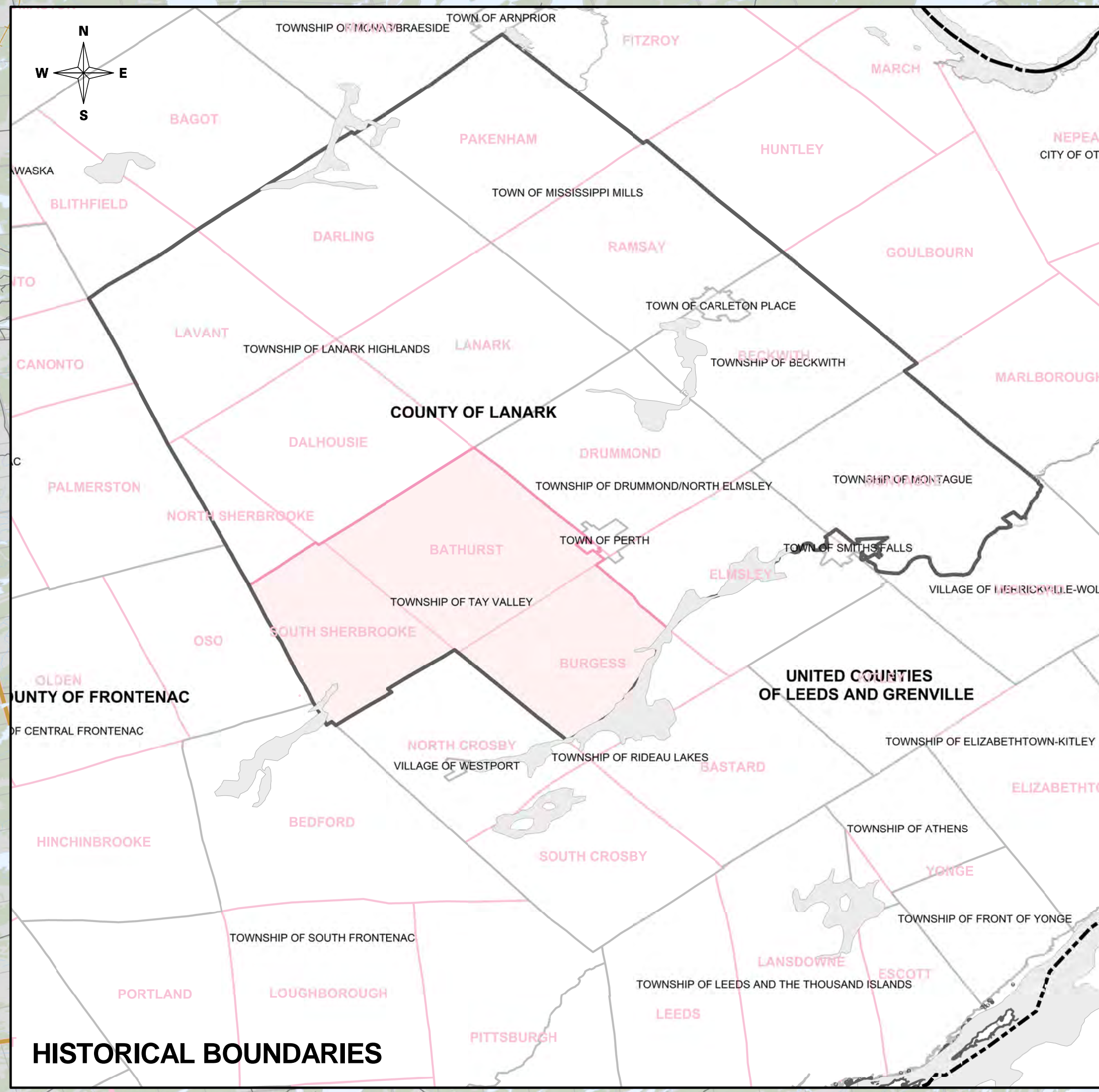
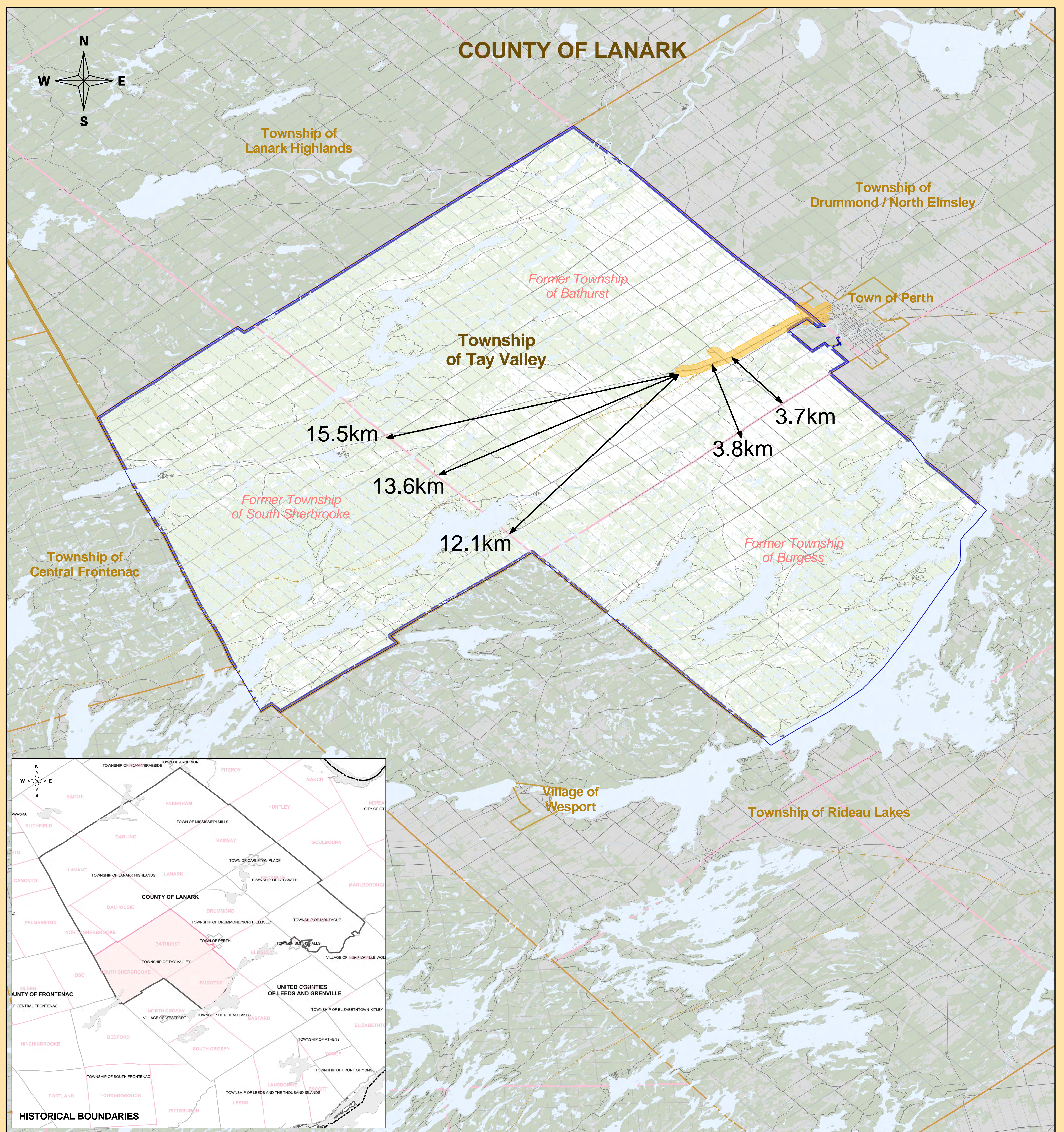
Supplemental Response:

- a) Please see Exhibit EGI-CNL-1 Supplemental - Attachment 2.
- b) Please see Exhibit EGI-CNL-1 Supplemental - Attachment 2.
- c) Pipeline construction costs vary due to project design, location and other project specific reasons. Costs from particular projects should not be used for extrapolation unto others as necessarily meaningful comparisons. More specifically, the drivers below are among those that explain why pipeline construction costs can vary significantly from project to project:
- conditions such as the number of road crossings, water crossings and trenchless crossings
 - inflation impacts on labour, materials and equipment costs, especially in volatile periods like 2021–2023.
 - unexpected site conditions (e.g., buried pipe deeper in some locations)
 - weather-related disruptions (e.g., excessive rainfall) can contribute to delays and added costs
 - site-specific geotechnical and environmental surveys influence construction methods and risk premiums
 - projects in areas with challenging terrain, wet conditions, or dense urban infrastructure require more trenchless crossings and specialized techniques

Costs to construct pipeline for community expansion projects has varied greatly depending on pipe size, required pressure, method of construction, ground conditions, environmental assessment requirements, permit requirements, service cost/challenges, etc. The estimated cost of main pipeline has ranged from approximately \$300 to \$2500 per meter with the lower end representing 2" gas main install and the upper end involving work under a major river crossing with bedrock.

- d) The likelihood of residents and/or businesses in the former townships of South Sherbrooke and Burgess would have the demand necessary to make a service extension cost-effective will depend on the size of the development and the number of service locations involved. While the decision is ultimately up to any potential customers, in Enbridge Gas' experience, there would need to be a critical mass of service additions to make any such system extension economic.

- e) Pursuant to Procedural Order No. 4, a response to this question is not necessary.
- f) Yes.



Legend

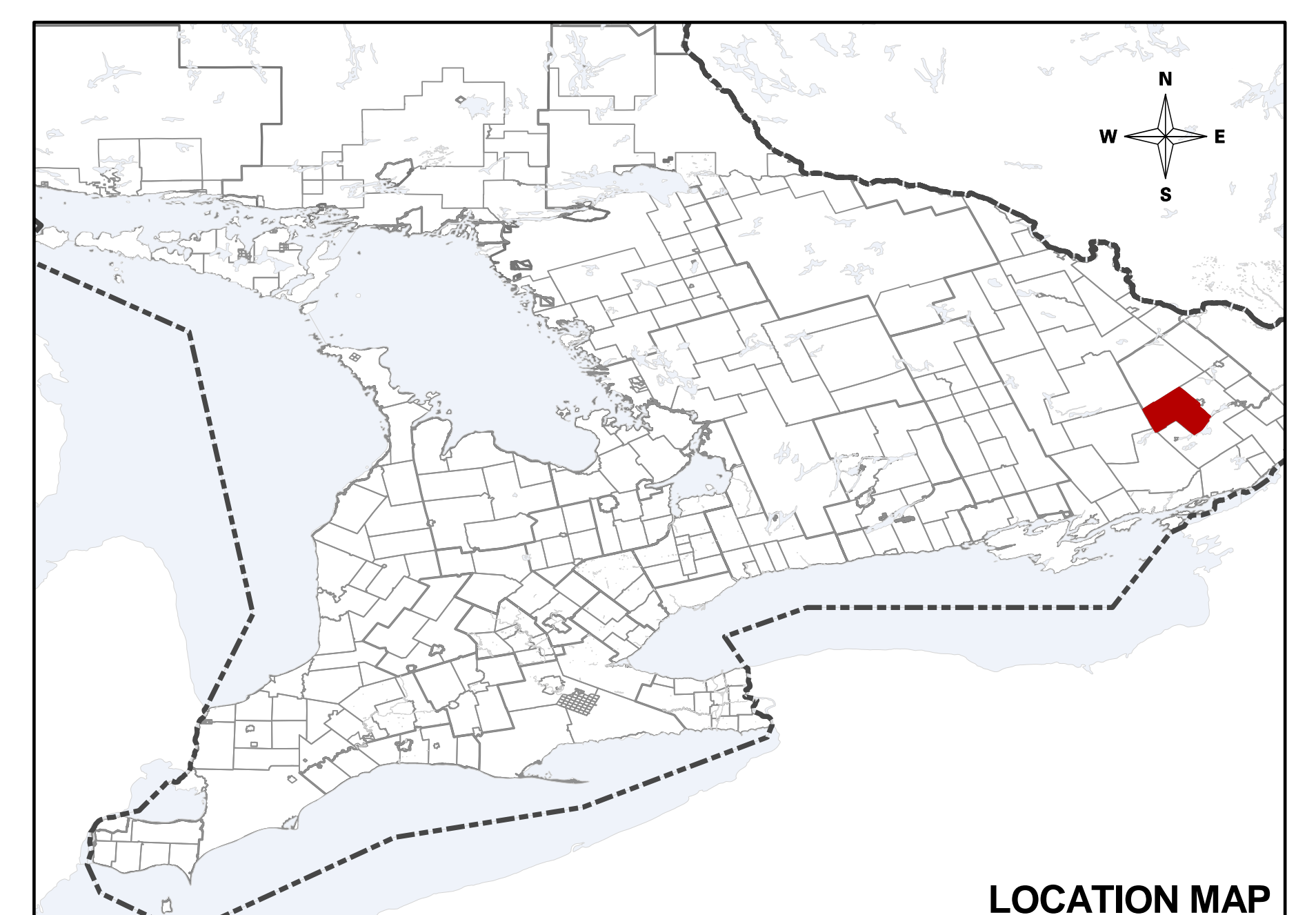
- Existing Enbridge Gas Pipeline Coverage Area
- Township or Tay Valley
- Roads
- Railways
- Historical Township Boundaries
- Municipal and Township Boundaries
- Indigenous Lands
- Wooded Areas

Township of Tay Valley



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

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



ENBRIDGE GAS INC.

Response to Interrogatory from
Climate Network Lanark

Original Questions:

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

Supplemental Preamble:

In EGI-CNL-8, Enbridge indicates as follows: “situations resulting in CPCNs being issued that do not cover the entire geographic area of a municipality are related to occasions where more than one natural gas distributor is operating.” However, the Natural Gas Facilities Handbook states as follows in s. 3.6.2:

If the boundaries of a person’s existing certificate are affected by a municipal amalgamation or annexation, and no other person holds a certificate for any part of the newly amalgamated or annexed municipal territories, then the person should notify the OEB within 90 days of the date that the change takes effect to have the certificate amended to reflect the change. The OEB will not as a matter of course amend the territory covered by the person’s existing certificate to include any additional service area that was added to the municipality through the amalgamation or annexation. The certificate would be amended to include the metes and bounds of the person’s existing certificate.

The handbook clearly states that certificates will not be amended as a matter of course to include any additional service area even where “no other person holds a certificate for any part of the newly amalgamated or annexed municipal territories” and that “the certificate would be amended to include the metes and bounds of the person’s existing certificate.”

Supplemental Questions:

How does Enbridge reconcile its position set out in EGI-CNL-8 with s. 3.6.2 of the Natural Gas Facilities Handbook set out above?

Original Response:

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

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

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

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

Supplemental Response:

To clarify, section 3.6.2 of the *Natural Gas Facilities Handbook* includes more than what has been included in the preamble submitted by CNL:

If the boundaries of a person's existing certificate are affected by a municipal amalgamation or annexation, and no other person holds a certificate for any part of the newly amalgamated or annexed municipal territories, then the person should notify the OEB within 90 days of the date that the change takes effect to have the certificate amended to reflect the change. The OEB will not as a matter of course amend the territory covered by the person's existing certificate to include any additional service area that was added to the municipality through the amalgamation or annexation. The certificate would be amended to include the metes and bounds of the person's existing certificate. However, the certificate holder could also apply for a new certificate that would include any additional service area within the newly amalgamated territories. [emphasis added]

The Application is not being brought in respect of any specific approval to construct works. As noted by the OEB in Procedural Order No. 2, Enbridge Gas has submitted a request to approve a new CPCN for Tay Valley Township to align the existing CPCN with current municipal boundaries in accordance with the direction from the OEB as described in section 3.6.2 of the *Natural Gas Facilities Handbook*.

As previously stated, Enbridge Gas' Application is consistent with recent CPCN decisions in which the OEB has noted that issuing new CPCNs that are geographically aligned with municipal borders is consistent with the intent of the OEB that the CPCN holders update service areas if boundaries of their existing CPCNs are affected by municipal amalgamations, annexations or name changes.¹ This position is supported by the guidance in the Natural Gas Facilities Handbook to notify the OEB of any change to municipal boundaries in order to have CPCNs amended to reflect any change.²

While Tay Valley Township is a predominantly rural location, not granting a CPCN that covers the whole Tay Valley Township would be a departure from the above-noted regulatory expectations and practices, which have underpinned a series of OEB decisions to date. It could also unnecessarily delay responding to requests for natural gas service in currently unserved areas of the municipality. This is especially true for residents and businesses that may be in proximity to the various pipelines being constructed related to the proposed community expansion project.

As was recently highlighted in the Ontario Government's Integrated Energy Plan, whether heating a home, fueling a vehicle, or powering a business, customers are best positioned to decide which energy solutions work for them – based on their needs, preferences, and budgets:

Energy for Generations supports this choice by making a diverse range of energy options available, from natural gas and electricity to low-carbon fuels like renewable natural gas, hydrogen and biofuels. Customers can choose to stay with familiar energy sources, adopt emerging technologies like heat pumps or EVs, or combine solutions through hybrid systems. This flexibility helps households and businesses keep costs down while ensuring they have reliable energy when they need it most.

*By protecting customer choice, the government is supporting energy decisions that work not just for today, but for generations to come – empowering people to manage their costs, drive innovation, and help power Ontario's economy and communities in the way that suits them best.*³

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

² [Natural Gas Facilities Handbook](#)

³ [Ontario's Integrated Energy Plan – Energy for Generations](#), page 14

ENBRIDGE GAS INC.

Response to Interrogatory from
Climate Network Lanark

Original Questions:

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

Supplemental Question:

In respect of EGI-CNL-9, Enbridge Gas shall provide the information that was requested in parts (b) and (c).

Original Response:

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

Supplemental Response:

- b) The “proposed Tay Valley Township MFA s. 8 certificate” would cover all of Tay Valley Township. As noted in the response at Exhibit EGI-OEB-2 Supplemental, there is pipe

proposed to be built within Tay Valley Township associated with the proposed Lanark and Balderson Community Expansion Project.

Please refer to the response at Exhibit EGI-OEB-2 Supplemental.

- c) Other than the potential customers that could be added pursuant to the proposed Lanark and Balderson Community Expansion Project, as noted in the original response, based on available records, there are 31 properties with structures along existing pipelines located within Tay Valley Township that are not currently provided services by Enbridge Gas but could request service. Enbridge Gas does not currently have any service requests from any resident or business within Tay Valley Township and we are not able to predict when any such request may be submitted.