



Ontario Energy Board | Commission de l'énergie de l'Ontario

BY EMAIL

December 23, 2025

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

Dear Mr. Murray:

**Re: Enbridge Gas (Enbridge Gas)
Washago Community Expansion Project
OEB Staff Interrogatories
Ontario Energy Board File Number: EB-2025-0271**

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

Enbridge Gas is reminded that its responses to interrogatories are due by January 22, 2026.

Yours truly,

Zora Crnojacki

Zora Crnojacki
Senior Advisor, Natural Gas Applications

Encl.

OEB Staff Interrogatories
Enbridge Gas Inc.
EB-2025-0271

Please note, Enbridge Gas is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff interrogatories and any other supporting documentation, do not include personal information (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's *Rules of Practice and Procedure*.

ISSUE 1.0 NEED FOR THE PROJECT

Staff-1

Ref: Exhibit A, Tab 2, Schedule 1, page 2, paragraph 4: Application

Preamble:

The Washago Community Expansion Project was approved to receive funding assistance from Phase 2 of the Government of Ontario's Natural Gas Expansion Program (NGEP). On June 9, 2021, the Government of Ontario announced that 28 projects across 43 communities were selected for funding under Phase 2 of the NGEP, including the Project.

Question:

Please file an unredacted version of Enbridge Gas's NGEP proposal for the Washago Community Expansion Project.

Staff-2

Ref: Exhibit A, Tab 1, Schedule 1, page 3, paragraph 7; Exhibit D, Tab 1, Schedule 1, Attachment 1: Project Schedule; Exhibit A, Tab 2, Attachment 1-Project Map

Preamble:

Enbridge Gas provided a construction schedule for the Project. The Project is proposed to be constructed over three phases. According to the Project Schedule, the OEB's

approval is anticipated by the end of July 2026 and construction planned to start about eight months later, in April 2027.

- a) Phase 1 is planned to commence in April 2027 and be placed into service by September 2027
- b) Phase 2 is planned to commence in July 2027 and be placed into service by January 2028
- c) Phase 3 is planned to commence in December 2027 and be placed into service by September 2028

Questions:

- a) On the Project Map filed with the application, please delineate the three phases of the Project.
- b) Please explain the rationale for the eight-month estimated lead time between the anticipated approval and the planned start of Phase 1 construction. Please specify the pre-construction activities Enbridge Gas expects to conduct in advance of the construction start for Phase 1.

Staff-3

Ref: Exhibit B, Tab 1, Schedule 1, pages 3-6, Market Research and page 5, Table 1: Forecasted Customers Attachments for the Project

Preamble:

Enbridge Gas retained Forum Research to conduct quantitative research to assess the interest in natural gas service to support the need for the Project. A total of 296 surveys were completed between July 23, 2023 and August 9, 2023. Below is the table Enbridge Gas filed with the application showing forecasted attachments over ten years.

Table 1: Forecasted Customer Attachments for the Project

| Customer Additions | Year 1 | Year 2 | Year 3 | Year 4 | Year 5 | Year 6 | Year 7 | Year 8 | Year 9 | Year 10 | Total Forecasted |
|-----------------------------------|------------|------------|-----------|-----------|-----------|----------|----------|----------|----------|----------|------------------|
| Conversions | | | | | | | | | | | |
| Residential Units (Singles) | 178 | 112 | 90 | 35 | 10 | 7 | 4 | 4 | 4 | 4 | 447 |
| Commercial (small, medium, large) | 0 | 10 | 5 | 5 | 3 | 2 | 1 | 0 | 0 | 0 | 26 |
| Total | 178 | 122 | 95 | 40 | 13 | 9 | 5 | 4 | 4 | 3 | 473 |

Questions:

- a) Please provide and explain the basis for any updates or adjustments to the forecast of connections since the market survey research was completed in August 2023.
- b) Assuming the construction of Phase 1 starts in April 2027, and the first attachments are planned for September 2027, please update the customer attachment forecast since the market research was conducted in 2023. Explain the method Enbridge Gas uses to keep the customer attachment forecast current.
- c) If new data on the customer attachments is available, please update Table 1: Forecasted Customer Attachments for the Project.

ISSUE 3.0 PROJECT COST AND ECONOMICS

Staff-4

Ref: Exhibit E, Tab 1, Schedule 1, page 1, paragraph 1 Table 1: Estimated Project Costs (\$CAD); Exhibit E, Tab 1, Schedule 1, page 2, paragraph 3

Preamble:

Table 1: Estimated Project Costs (\$CAD)

| Item No. | Description | Pipeline Facility Costs Distribution Pipeline | Ancillary Facility Costs ¹ | Total Costs |
|----------|--|--|--|-------------|
| 1 | Material | 214,757 | 492,997 | 707,754 |
| 2 | Construction | 14,380,723 | 3,084,921 | 17,465,644 |
| 3 | Outside Services | 4,140,628 | 755,816 | 4,896,444 |
| 4 | Land, Permits, Approvals and Consultations | 349,282 | 2,622 | 351,904 |
| 5 | Contingency | 3,416,916 | 826,520 | 4,243,436 |
| 6 | Sub-Total | 22,502,306 | 5,162,876 | 27,665,182 |
| 7 | Interest During Construction | 414,535 | 11,015 | 425,550 |
| 8 | Total Project Cost | 22,916,841 | 5,173,891 | 28,090,732 |
| 9 | Original Proposed Cost | | | 28,859,544 |
| 10 | Variance (8-9) | | | (768,812) |

The cost estimate is \$ 22,916,841 without \$ 5,173,891 ancillary facilities costs. Total Project Costs are lower than the amount estimated in Enbridge Gas's original project proposal to the Government of Ontario for funding under Phase 2 of the NGEP by approximately \$768,812 (EB-2019-0255). Enbridge Gas explained that the cost variance is mainly due to a decrease in the forecasted pipe lengths and a decrease in forecasted customer attachments, which was a result of field investigations that identified constructability constraints in specific areas.

Questions:

- a) Does Enbridge Gas anticipate any further adjustments of the proposed pipelines route and specification if the customer attachment forecast (i.e. number and location) changes? Please discuss your response.

- b) Please provide a breakdown of costs in Item No. 4 into categories as follows:
 - i) Land
 - ii) Permits and approvals
 - iii) Consultations
- c) Please indicate the percentage of forecasted “Consultations” costs attributed to Indigenous consultation related to the Project. Please indicate how the Indigenous consultation costs will be recovered by Enbridge Gas.

Staff-5

Ref: Exhibit E, Tab 1, Schedule 1, pages 1-2

Preamble:

The Estimated Project Costs includes a 20% contingency applied to all direct costs. Enbridge Gas noted that this contingency amount has been calculated based on the risk profile of the Project and that it is consistent with contingency amounts calculated for similar Enbridge Gas projects in the past.

Questions:

- a) Please provide examples of other OEB approved past Enbridge Gas projects, with similar contingency amounts, as referenced in the evidence. Please explain the basis for the comparison.
- b) Please provide a narrative on the aspects of risk profile of the Project that results in the proposed 20% contingency amount and how these aspects compare to other relevant past projects.

ISSUE 4.0 ENVIRONMENTAL IMPACTS

Staff-6

Ref: Exhibit F, Tab 1, Schedule 1, p.3 and Environmental Report, Appendix G: Stakeholder Engagement Logs

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 July 6, 2025, with a request for comments by August 18, 2025. Enbridge Gas filed the comments received on the ER in Appendix G.

Question:

Please file an update of the comments provided in Appendix G. (summarized in tabular format) that Enbridge Gas has received as part of its consultation since the application was filed, including the supporting documentation (e.g., emails and other correspondence). 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.

Staff-7

Ref: Exhibit F, Tab 1, Schedule 1

Preamble:

Enbridge Gas stated that a Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment (CHRECPA) and Stage 1 Archaeological Assessment (AA) were submitted for review to the Ministry of Citizenship and Multiculturalism (MCM). Enbridge Gas stated that Stage 2 AA would be completed in Q2 2026 and submitted to MCM for review.

Questions:

- a) Please provide a summary of any comments that have been received from MCM on CHRECPA.
- b) Please provide a summary of any comments that have been received from MCM on Stage 1 AA.
- c) Please describe how Enbridge Gas consulted with the Indigenous communities including the timing and role of their participation in Stage 2 AA.
- d) Please provide a summary of any comments received from consulted communities about:
 - i) schedule and location of Stage 2 AA
 - ii) monitoring Stage 2 AA surveys, and
 - iii) review of the reports on Stage 2 AA prior to submission to the MCM.

Staff-8

Ref: Exhibit D, Tab 1, Schedule 1, pages 8-9

Preamble:

On August 18, 2025, Enbridge Gas sent the application for the design of the proposed facilities to the Technical Standards & Safety Authority (TSSA). Enbridge Gas had not received a review of the application of pipelines design specifications as of October 7, 2025.

Questions:

- a) Please provide an update on the status of the TSSA's review of the Project design, including any relevant correspondence related to the TSSA review.
- b) If the TSSA has not yet responded with its review, what is the anticipated timing of TSSA's confirmation that it 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?

ISSUE 5.0: ROUTE MAP AND FORM OF LANDOWNER AGREEMENTS

Staff-9

Ref: Exhibit G, Tab 1, Schedule 1

Preamble:

Enbridge Gas stated that the Project is anticipated to follow the public road allowance for the majority of the proposed pipeline route. Municipal consent to construct within road allowances will have to be obtained from the Township of Severn and the Town of Gravenhurst. Enbridge Gas does not anticipate that any permanent easements will be required. Enbridge Gas will also need to obtain rights for temporary working areas at locations to be determined by the construction contractor. The evidence includes forms of permanent and temporary land use agreements Enbridge Gas has offered or will offer to the directly impacted landowners. The forms of these agreements have been previously approved by the OEB for use in Enbridge Gas's Ridge Landfill RNG Project.¹

¹ EB-2022--0203

Question:

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

Staff-10

Ref: Exhibit G, Tab 1, Schedule 1, pages 1-2

Preamble:

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

Enbridge Gas also stated that other authorizations, notifications, permits and/or approvals may be required in addition to the ones listed. Enbridge Gas is committed to obtaining all the required permits and approvals prior to the start of construction.

Questions:

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

ISSUE 6.0 INDIGENOUS CONSULTATION

Staff-11

Ref: Exhibit H, Tab 1, Schedule 1, and Attachments 2,7,8

Preamble:

The Ministry of Energy and Mines (MEM), by way of letter dated January 17, 2025, identified ten Indigenous communities to be consulted in relation to the Project and delegated procedural aspects of the consultation to Enbridge Gas (Delegation Letter):

- Alderville First Nation
- Chippewas of Beausoleil First Nation

- Chippewas of Georgina Island First Nation
- Chippewas of Rama First Nation
- Curve Lake First Nation
- Hiawatha First Nation
- Huron Wendat Nation (Wendat Nation)
- Mississaugas of Scugog Island First Nation
- Kawartha Nishnawbe First Nation
- Metis Nation of Ontario Region 7

The MEM Delegation Letter indicates MEM's preliminary assessment of the level of consultation to be conducted by Enbridge Gas for each of the ten Indigenous Communities. MEM has assessed the level of consultation at low for Huron-Wendat Nation and at a moderate level for the remaining nine Indigenous communities and Nations.

The Delegation Letter states that Enbridge Gas should inform the MEM if, during the consultation, information warranting a deeper level of consultation becomes available, Enbridge Gas must contact the MEM for updated guidance.

On October 7, 2025 Enbridge Gas filed with the MEM the Indigenous Consultation Report (ICR), logs and copies of communication documentation. The ICR summarizes Indigenous consultation activities up to September 7, 2025. The ICR is being reviewed by the MEM. The MEM 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. Determination by the MEM will be in a form of a Letter of Opinion to Enbridge Gas. Enbridge Gas is expected to file the MEM's Letter of Opinion with the OEB as soon it is received.

Questions:

- a) 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 or is committed to doing to address these issues.
- b) Please comment if Enbridge Gas has acquired, to date, any new information that warrants a deeper level of consultation than the levels identified by the MEM in the Delegation Letter.

- c) Please provide a summary of all forms of accommodation that Enbridge Gas has committed and agreed to make or made to any of the consulted Indigenous communities in response to the concerns raised in the Indigenous consultation process for the Project.
- d) Please provide an update on Indigenous consultation activities set out in Attachments 7 and 8, summarizing any issues and concerns raised and how these are being addressed. Please include any supporting documentation. Please file an updated ICR as of December 23, 2025.
- e) In addition to updates to Attachment 7 and Attachment 8, please provide a list of all in-person or virtual meetings with each Indigenous community (and/or their representatives) including the dates and locations of the meetings and an overview of the issues and agenda addressed in each meeting. Include any action or follow-up agreed upon to be taken by Enbridge Gas and/or Indigenous community.
- f) Please advise if any of the Indigenous communities identified in the Delegation Letter has been consulted in work relating to Stage 1 AA and/or Stage 2 AA. Please describe the consultation scope and outcomes.
- g) Please describe Enbridge Gas's format and scope of communication with MEM staff regarding the procedural aspects of consultation delegated to Enbridge Gas by the MEM for the Project since the outset of consultation.
- h) Please update the evidence with any correspondence between the MEM and Enbridge Gas since the application was filed regarding the MEM's review of Enbridge Gas's consultation activities.
- i) Please indicate when Enbridge Gas expects to receive a Letter of Opinion from the MEM.

Staff-12

Ref: Exhibit H, Tab 1, Schedule 1, and Attachments 2,7,8

Preamble:

Regarding capacity funding, Enbridge Gas noted that it offered funding to each Indigenous community identified as potentially impacted by the project. According to Enbridge Gas, capacity funding will support timely activities such as technical review of project documents and engagement in meaningful consultation.

Questions:

- a) Please provide information on which Indigenous communities accepted and were provided capacity funding by Enbridge Gas as of December 23, 2025 and describe the activities supported by the capacity funding that was provided.
- b) Please advise if any Indigenous communities raised concerns with Enbridge Gas with respect to the capacity funding being offered and if so, how Enbridge Gas responded to such concerns.

Staff-13

Ref: Letter of Comment by Wendat Nation, December 12, 2025

Preamble:

On December 12, 2025, Wendat Nation filed a Letter of Comment to inform the OEB of specific concerns regarding receipt of the ER and Stage 1 AA and Stage 2 AA reports during the planning phase.

Rule 23.05 of the OEB's *Rules of Practice and Procedure* requires Enbridge Gas to address the issues raised in the Letter of Comment by way of a document filed in the proceeding before the proceeding's record is closed.

Question:

Please provide reply comments to the Letter of Comment by Wendat Nation. In this reply, please include a response to the request that the Stage 2 AA report be provided to the Wendat Nation 30 days prior to the submission of the ER.

To ensure the timely hearing of this application, Enbridge Gas is encouraged to respond to the comments from Wendat Nation by no later than the filing of interrogatory responses to its evidence.