

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Schedule B; and in particular sections 90(1) and 97 thereof;

**AND IN THE MATTER OF** an application by Enbridge Gas Inc. for an order granting leave to construct natural gas distribution pipelines and ancillary facilities that make up the Waubuno Gathering System and Compressor Replacement Project to serve the community of St. Clair.

**AFFIDAVIT OF SERVICE**

I, Preet Gill of the City of Brampton, make oath and say as follows:

1. I am in the employ of Enbridge Gas Inc. (Enbridge Gas) and as such have knowledge of the matters hereinafter deposed to.
2. On or about October 8, 2025, a search of title for Waubuno Gathering System and Compressor Replacement Project, was completed forthwith sufficient to determine the owners and encumbrances with land, or registered interests in land directly affected by the construction of the proposed pipeline and related facilities was conducted (included as part of Exhibit C to this Affidavit).
3. Pursuant to the December 19, 2025, Letter of Direction from the Ontario Energy Board (OEB), I caused to be served by courier the Notice of Hearing (Exhibit A), Enbridge Gas' Application including the exhibits listed below (Exhibit B) upon all property owners and encumbrances with lands or interest in lands as shown in Exhibit G, Tab 1, Schedule 1, Attachment 5 of Enbridge Gas' pre-filed evidence.
  - Exhibit B-1-1 – Project Need
  - Exhibit C-1-1 – Alternatives
  - Exhibit D-1-1 – Proposed Project, Engineering, and Construction
  - Exhibit E-1-1 – Project Costs & Economics
  - Exhibit F-1-1 – Environmental Matters
  - Exhibit G-1-1 – Land Matters and Agreements
  - Exhibit H-1-1 – Indigenous Consultation
  - Exhibit I-1-1 – Conditions of Approval

4. Attached hereto is proof in the form of Loomis courier confirmation sheets (Exhibit C), that the relevant Notice of Hearing, and Enbridge Gas' Application and evidence was served on those parties noted in the paragraph above as requested by the OEB in the Letter of Direction. Personal information has been redacted from the landowner and encumbrancer listing.
  
5. As directed by the OEB in the Letter of Direction, attached hereto is proof in the form of an email (Exhibit D) that the relevant Notice of Hearing, and Enbridge Gas' Application and evidence was served on the following parties:
  - a) The deputy clerk/ coordinator of planning at the Township of St. Clair
  - b) All indigenous communities that have been consulted or with lands or interest in the lands directly affected by the proposed pipeline and related facilities
  - c) The Métis Nations of Ontario, Suite 1100 – 66 Slater Street, Ottawa, ON K1P 5H1
  - d) All affected utilities and railway companies
  - e) Members of the Ontario Pipeline Coordinating Committee
  
6. In accordance with the Letter of Direction, I caused a copy of the Notice of Hearing and Application and Evidence to be placed in a prominent place on Enbridge Gas' website. Attached as Exhibit E is proof of the information posted to the website.

SWORN before me in the City of )  
 Toronto, this 28th day of )  
 January, 2026. )  
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 A Commissioner for taking Affidavits.

*Preet Gill*

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 Preet Gill  
 Regulatory Coordinator

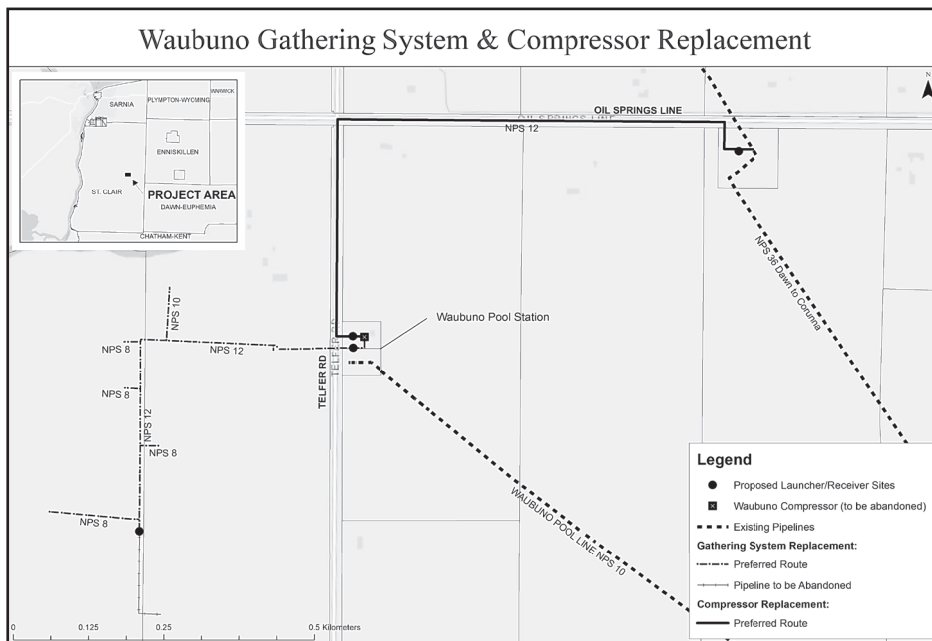
# NOTICE OF A HEARING

## Enbridge Gas Inc. has applied to construct natural gas pipelines in the Township of St. Clair

### Enbridge Gas Inc. (Enbridge Gas) is asking for approval:

- To construct approximately 1.1 km of Nominal Pipe Size (NPS) 12 steel natural gas pipeline from the Waubuno Pool Station to Enbridge Gas's existing NPS 36 Dawn to Corunna pipeline to replace the Waubuno Compressor Package in the Waubuno Designated Storage Area (Waubuno Storage Pool).
- To construct approximately 640 m of NPS 12 natural gas pipeline to replace existing NPS 6, 8, and 10 sections of the Waubuno Gathering Line and approximately 220 m of NPS 8 and 87 m of NPS 10 natural gas pipelines to replace five existing well laterals in the Waubuno Storage Pool.
- Of the forms of agreements it will offer to landowners affected by the routing or location of the proposed pipelines.

### The location of the proposed pipelines is shown in the map.



### The OEB will also assess:

- The applicant's compliance with the OEB's Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario.
- Whether the duty to consult with Indigenous Communities potentially affected by the proposed pipeline has been discharged with respect to the application.

This hearing will be held under section 90(1) and 97 of the **Ontario Energy Board Act, 1998**, S.O. 1998, c.15, Schedule B.

### YOU SHOULD KNOW

#### THE ONTARIO ENERGY BOARD WILL HOLD A PUBLIC HEARING

There are three types of OEB Hearings: oral, electronic and written. The applicant has applied for a written hearing. If you think a different hearing type is needed, you can write to us to explain why. During this hearing, we will question the applicant about its case. We will also hear questions and arguments from participants that have registered as Intervenor. After reviewing all the evidence, we will decide whether to approve this application.

#### HAVE YOUR SAY

You have the right to information about this application and to participate in the process. Visit [www.oeb.ca/notice](http://www.oeb.ca/notice) and use file number **EB-2025-0307** to:

- Review the application
- Apply to become an intervenor
- File a letter with your comments

#### IMPORTANT DATES

You must engage with the OEB on or before **January 19, 2026** to:

- Provide input on the hearing type (oral, electronic or written)
- Apply to be an intervenor

If you do not, the hearing will move forward without you, and you will not receive any further notice of the proceeding.

#### PRIVACY

If you write a letter of comment, your name and the content of your letter will be put on the public record and the OEB website. If you are a business or if you apply to become an intervenor, all the information you file will be on the OEB website.

### LEARN MORE

#### Ontario Energy Board

☎/TTY: 1 877-632-2727

🕒 Monday - Friday:  
8:30 AM - 5:00 PM

🌐 [oeb.ca/notice](http://oeb.ca/notice)

#### Enbridge Gas Inc.

☎ 1-877-362-7434

🕒 Monday - Friday:  
8:00 AM - 6:00 PM

🌐 [enbridgegas.com](http://enbridgegas.com)

Filed: 2025-11-24  
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## ONTARIO ENERGY BOARD

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B, and in particular, section 90(1) and section 97 thereof;

**AND IN THE MATTER OF** an Application by Enbridge Gas Inc. for an Order granting leave to construct natural gas pipelines in St. Clair Township.

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**ENBRIDGE GAS INC.**

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### APPLICATION

1. Enbridge Gas Inc. (Enbridge Gas or the Company) has identified the need to abandon, remove and replace the Waubuno Compressor Package located at the Waubuno Pool Station due to identified reliability and obsolescence concerns. Enbridge Gas has also identified the need to replace the Waubuno Storage Pool Gathering Line (Waubuno Gathering Line) and select well laterals in the Waubuno Storage Pool (together with the Waubuno Gathering Line, the Waubuno Gathering System) to address integrity concerns. Accordingly, Enbridge Gas hereby applies to the Ontario Energy Board (OEB) pursuant to section 90(1) of the Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B (the Act), for an order granting leave to construct the following facilities as part of the Waubuno Gathering System and Compressor Replacement Project (Project):
  - (i) Approximately 1.1 km of Nominal Pipe Size (NPS) 12 steel natural gas pipeline from the Waubuno Pool Station to Enbridge Gas's existing NPS 36 Dawn to Corunna pipeline to replace the Waubuno Compressor Package.

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- (ii) Approximately 640 m of NPS 12 natural gas pipeline to replace existing NPS 6, 8, and 10 sections of the Waubuno Gathering Line and approximately 220 m of NPS 8 and 87 m of NPS 10 natural gas pipelines to replace five existing well laterals in the Waubuno Storage Pool.
2. Enbridge Gas also applies to the OEB, pursuant to Section 97 of the Act, for an Order or Orders approving the form of Pipeline Easement agreement and form of Temporary Land Use agreement found in the pre-filed evidence at Exhibit G, Tab 1, Schedule 1, Attachments 6 and 7, respectively.
  3. For ease of reference and to assist the OEB with preparation of the Notice of Application for the Project, a map of the proposed facilities is included at Attachment 1 to this Exhibit.
  4. The proposed facilities are located in St. Clair Township. Enbridge Gas has a Franchise Agreement<sup>1</sup> and a Certificate of Public Convenience and Necessity<sup>2</sup> that cover all areas within St. Clair Township within which the Project will be constructed. Enbridge Gas has also received a letter of support for the Project from St. Clair Township, included at Attachment 2 to this Exhibit.
  5. With leave to construct approval from the OEB, replacement of the Waubuno Gathering System is planned to commence in August 2026 and be placed into service by November 2026. Construction of the proposed NPS 12 natural gas pipeline to replace the Waubuno Compressor Package is planned to commence in February 2027 and be placed into service by September 2027. To meet construction timelines, Enbridge Gas

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<sup>1</sup> St. Clair Township Franchise Agreement – EB-2010-0382 (effective until March 14, 2031).

<sup>2</sup> St. Clair Township Certificate of Public Convenience and Necessity – EB-2010-0384 (issued on February 15, 2011).



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Address for personal service 500 Consumers Road  
Toronto, ON M2J 1P8

Mailing Address: P. O. Box 650  
Scarborough, ON M1K 5E3

Telephone: (416)-495-5924

Email: [henry.ren@enbridge.com](mailto:henry.ren@enbridge.com)

DATED at the City of Windsor, Ontario this 24<sup>th</sup> day of November 2025.

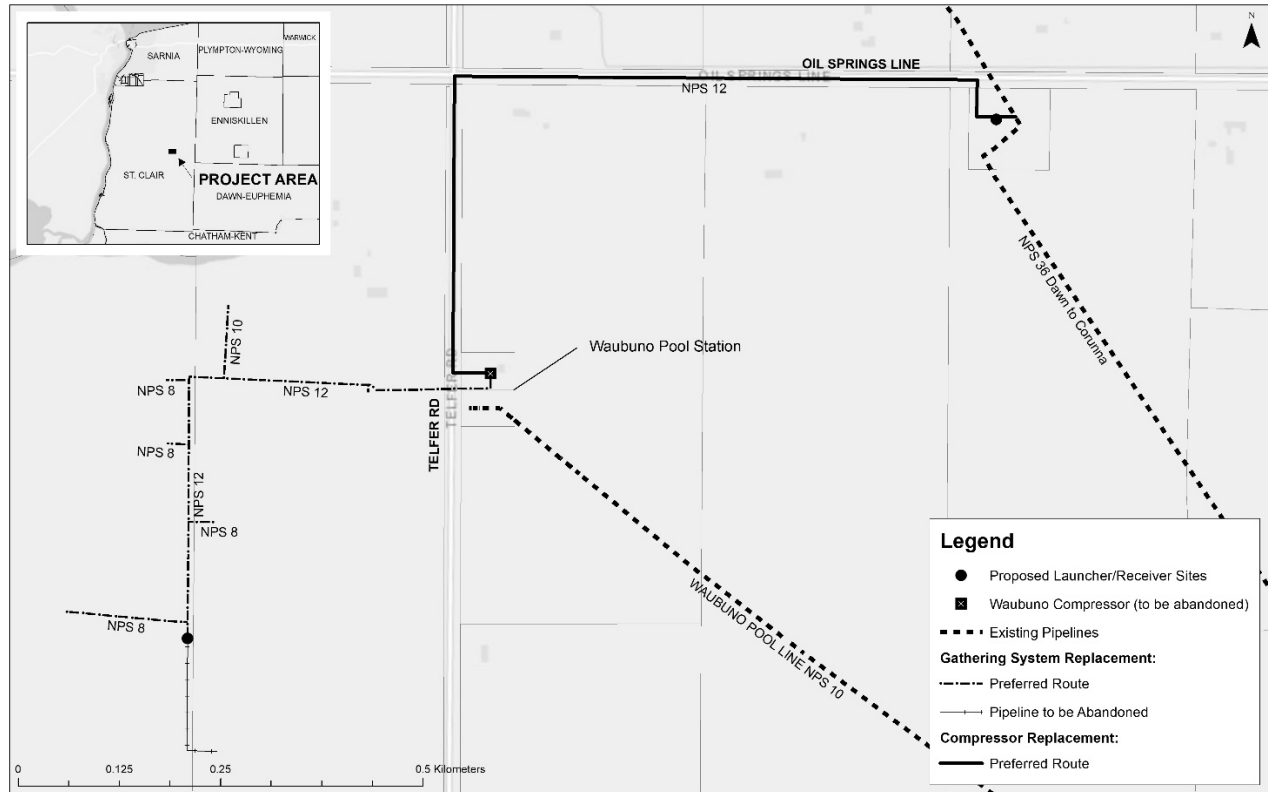
**ENBRIDGE GAS INC.**

*Evan Tomek*

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Evan Tomek  
Senior Advisor, Regulatory Applications - Leave to Construct

# Waubuno Gathering System & Compressor Replacement



## PROJECT NEED

1. The purpose of this section of evidence is to review the need for and to provide an overview of Enbridge Gas Inc.'s (Enbridge Gas or the Company) application (Application) requesting an order under Section 90(1) of the *Ontario Energy Board Act, 1998* (Act) granting leave to construct the Waubuno Gathering System and Compressor Replacement Project (Project). A map of the proposed Project is shown in Attachment 1 to Exhibit A, Tab 2, Schedule 1.
  
2. The Exhibit is organized as follows:
  - A. Introduction
  - B. Overview - Waubuno Storage Pool and the Dawn Hub
  - C. Waubuno Compressor Package Lifecycle Replacement
  - D. Waubuno Pool Gathering System Integrity
  - E. Waubuno Gathering System Enhancements
  - F. Conclusions
  
3. **Introduction**
3. Enbridge Gas has identified the need to abandon, remove and replace the Waubuno Compressor Package due to identified reliability and obsolescence concerns. Additionally, Enbridge Gas has identified the need to replace the Waubuno Storage Pool Gathering Line (Waubuno Gathering Line) and select well laterals in the Waubuno Storage Pool (together with the Waubuno Gathering Line, the Waubuno Gathering System) to address integrity concerns.
  
4. To efficiently address the needs associated with both the Waubuno Compressor Package and Waubuno Gathering System, Enbridge Gas has combined the needs into a single Project under one leave to construct application. Exhibit D, Tab 1,

Schedule 1, provides a detailed description of the proposed facilities

**B. Overview - Waubuno Storage Pool and the Dawn Hub**

5. The purpose of this section of evidence is to describe the characteristics of the Waubuno Storage Pool and its operation within the Dawn Hub. For more information on the Dawn Hub, please refer to Exhibit B, Tab 2, Schedule 1.
6. The Waubuno Storage Pool operates as a baseload pool<sup>1</sup> within the Dawn Hub and represents approximately 3% of the total underground natural gas storage space owned or operated by the Company. It has a working natural gas storage capacity of approximately 10.5 PJ and provides approximately 63 TJ/day of withdrawal capability on Design Day. It currently operates at a Planned Maximum Operating Pressure (PMOP) of 8,570 kPag.
7. The Waubuno Storage Pool was discovered in 1951 and the first assets associated with the Waubuno Storage Pool were commissioned in 1955 when the Company received rights for gas production. Most of these assets continue to operate today. Authority to inject natural gas into, store natural gas in and remove natural gas from the Waubuno Storage Pool was authorized by the Fuel Board of Ontario (FBO) pursuant to an Order issued on August 10, 1960, in the FBO 35 proceeding.
8. The Waubuno Pool Station consists of the Waubuno Compressor Package and pool measurement and regulation. The Waubuno Compressor Package has been operating at the Waubuno Pool Station since 1988.
9. The Waubuno Storage Pool operates using six injection/withdrawal wells, one Guelph observation well, and one A1 observation well. The injection/withdrawal

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<sup>1</sup> A baseload pool operates on a seasonal cycle, requiring most of the withdrawal season to empty the pool and stabilize pressure, and most of injection season to completely fill the pool and stabilize pressure.

wells are connected to the Waubuno Pool Station via the Waubuno Gathering System consisting of gathering pipelines and well laterals.

10. The Waubuno Pool Station is currently connected to the Dawn Operations Centre via the NPS 10 Waubuno Pool Line installed in 1955. Natural gas for injection into and withdrawal from the Waubuno Storage Pool is transported solely using the NPS 10 Waubuno Pool Line, which is approximately 10 km in length. The Waubuno Pool Line is in-line inspected as per Enbridge Gas's pipeline integrity standards and is fit for service.
11. During the injection season, compression at the Dawn Operations Centre is used to fill approximately 6.5 PJ of the Waubuno Storage Pool storage space using the NPS 10 Waubuno Pool Line to a pressure of approximately 6,550 kPag based on the pipeline's maximum operating pressure (MOP) of 6,900 kPag. To fill the Waubuno Storage Pool beyond the limit of the Waubuno Pool Line's MOP, the Waubuno Compressor Package is utilized to further compress the natural gas and fill the pool to the PMOP of 8,570 kPag. The Waubuno Compressor Package operates for approximately 45 days per year and is responsible for filling approximately 4 PJ of the Waubuno Storage Pool's storage space.
12. During the withdrawal season, the Waubuno Compressor Package is not utilized. Natural gas flows from the Waubuno Storage Pool to the Dawn Operations Centre using the NPS 10 Waubuno Pool Line where storage compression units at Dawn are used to draw gas from the Waubuno Storage Pool down to its minimum operating pressure (cushion) of 2,000 kPag.
13. The Waubuno Storage Pool is used by Enbridge Gas to fulfill part of the storage requirements for both regulated and unregulated storage operations. The Project is

required to maintain the natural gas storage space capacity and injection capability of the Waubuno Storage Pool and the overall Dawn Hub.

### **C. Waubuno Compressor Package Lifecycle Replacement**

14. The Company recognizes its obligation to meet the firm demands of its customers and as a result, assets are continually evaluated to identify hazards and to assess risks to ensure that they remain reliable, suitable, and fit for continued service. To this end, an Asset Health Review (AHR) was performed in 2023 by the Company. The AHR was then an input into the comprehensive Reliability, Availability and Maintainability (RAM) Study for the Waubuno Compressor Package, which was completed by a third-party consultant. The results of the RAM Study indicate that the condition and challenges related to maintainability of the Waubuno Compressor Package are likely to result in an injection capacity shortfall of natural gas as described in this Exhibit. The RAM Study can be found at Attachment 1 to this Exhibit.
  
15. The Waubuno Compressor Package lifecycle replacement was first identified in the Company's 2018-2027 Asset Management Plan (AMP)<sup>2</sup> and most recently in the Company's 2025-2034 AMP<sup>3</sup>.
  
16. The Waubuno Compressor Package is comprised of four main systems: (1) the compressor, (2) the engine, (3) valves, and (4) the aftercoolers.
  
17. Both the engine and the compressor are reciprocating machinery. The compressor was manufactured by the Joy Compressor Company in 1976. It was installed at the

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<sup>2</sup> EB-2017-0306/EB-2017-0307, Union Gas Asset Management Plan 2018-2027 (filed March 23, 2018), Exhibit C.STAFF.54, Attachment 2, pp. 63-64.

<sup>3</sup> EB-2020-0091, 2025 - 2034 Asset Management Plan (filed November 8, 2024), pp. 206-207 and 211, Appendix A, and Appendix B.

Waubuno Pool Station as a used compressor in 1988 coupled with a Waukesha engine. A lifecycle replacement of the Waubuno Compressor Package is required due to its current condition and inability to source manufacturer recommended replacement parts.

18. Original equipment manufacturer (OEM) support for the compressor was discontinued more than 20 years ago. Although normal wear components are still available in the marketplace, replacement of major compressor items such as cylinders, crankshafts, and rods that may be required to resolve a critical failure are no longer available. In the event of a critical failure, sourcing used parts or aftermarket custom machining services would be the only option for repair. Any critical failure would render the Waubuno Compressor Package out of service for one or more operational seasons.

19. Waukesha is a brand of large stationary reciprocating engines produced by INNIO Waukesha Gas Engines. It builds large gas engines and related industrial equipment for natural gas compression and for power generation. In 2018, maintenance work was carried out on the Waukesha engine 9390 G (non-turbo) to ensure its continued operation as a temporary solution. The maintenance work included replacement of piston liners, rebuilding of the cylinder heads and installation of valves with the assistance of an external service provider since neither Waukesha nor the Company's regular suppliers were able to provide the necessary parts for this engine model. Due to the age of this engine, suppliers no longer have access to parts for this model and are unable to search for or source these parts/components. While Waukesha may be able to assist with obtaining certain components, there is no certainty that these parts will always be available.

20. Enbridge Gas has faced significant challenges sourcing replacement parts for the Waubuno Compressor Package during routine maintenance and because of equipment failures. Replacement parts for the Joy compressor do not exist in the marketplace and would need specialty fabricated or machined parts. For example, in 2007, a failure occurred with one of the discharge valve seats causing damage to a cylinder head. At that time, no supplier was able to provide a new replacement cylinder head. Consequently, the issue was resolved by installing a used one that was difficult to source. It is important to note that used parts may not come with warranties, introducing additional uncertainty and potential risk to ongoing operations due to the limited knowledge of the condition of these used replacement parts. Another option is to have the parts fabricated or machined using technical drawings, but these drawings are not always available. In this case, fabrication would require reverse engineering to reproduce a replacement part, which introduces additional outage time and delays for the delivery of components that would be required to repair and test the unit.
21. There are currently multiple mechanical problems with the compressor. Several cylinders are out of round and out of tolerance which compromises their performance. Another persistent issue is with the rod run outs which causes an angular misalignment. Although the installation of new rider bands has temporarily addressed this issue, it is not considered a feasible long-term solution as the underlying cause of angular misalignment cannot be addressed due to the lack of availability of parts and vendor support.
22. Due to concerns related to the reliability of the Waubuno Compressor Package and obsolescence of its parts, Enbridge Gas undertook a RAM study with a third-party consultant to assess the forecasted injection capacity shortfall of natural gas (shortfall). The shortfall discussed in the RAM study refers to a capacity shortfall

resulting from major failures or typical running failures over the 10-year study period. The inputs for the RAM study are reliability models for key systems as well as models that represent their expected repair times. Repair times are a critical factor in determining the availability of an asset due to the increased time required to repair as the asset becomes increasingly obsolete. The methodology used to estimate the injection capacity shortfall is comprised of two main components: AHR and RAM study. The AHR assessment used established reliability engineering concepts to determine compressor failure rates using historical failures observed at the Waubuno compressor and other similar Enbridge Gas compressors and published failure data by similar industrial settings with similar compressors to model the asset reliability and potential for failure. The RAM study used the estimated failure rates and repair times to calculate the injection capacity shortfall and associated probability of exceedance of that shortfall.

23. The AHR identified that the engine, valves, and aftercoolers are expected to have increasing failure rates within the 10-year study period. The compressor system is the largest contributor to the estimated injection capacity shortfall, and is expected to have a constant failure rate of one failure per year in the 10-year study period. Out of these failures, the AHR found that 65% of failures were typical running failures (failures that are resolved within two weeks) while the remaining 35% were attributed to major failures. Typically, major failures take more than three months to be repaired and could result in the Waubuno Compressor Package being out of service for at least one operation season. It was also found that compressor and engine systems accounted for approximately 92% of failures with individual contributions of 55% and 37%, respectively. Estimated major failure repair times are conservative and are specific to the repair that may be required. As demonstrated in an example described in the EB-2022-0086 proceeding<sup>4</sup>, in 2018 the Company sought to replace

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<sup>4</sup> EB-2022-0086, Exhibit B, Tab 1, Schedule 1, para. 34.

a broken crankshaft on compressor unit K705 in the Corunna Compressor Station. Replacement parts were challenging to supply in a timely manner due to obsolescence, and the replacement crankshaft took 8 months to be delivered and needed to be installed in an elaborate, OEM approved repair process. In total, this process resulted in 18 months of compressor unit downtime.

24. The RAM study found that there is a 12.28% injection capacity shortfall in the next 10 years. The study also estimates that there will be 0.9 major failures in the next 10 years either on the compressor system or the engine system (i.e., a major failure rate of one per approximately 11 years). If the compressor were to suffer a major failure as described above this could result in compressor unit downtime for one or more injection seasons resulting in lost physical storage space capacity and financial risk, as described in paragraphs 25 - 26.

25. If the Waubuno Compressor Package were to suffer a critical failure and be out of service for one injection season, Enbridge Gas would lose access to approximately 4.0 PJ of storage space provided by the Waubuno Storage Pool of which 2.5 PJ<sup>5</sup> is regulated utility storage. The 2.5 PJ of regulated storage space contributes to the total of 199.7 PJ of storage space in the Gas Supply Plan<sup>6</sup> used to serve utility customers. Losing this storage space reduces the amount of natural gas that can be delivered from storage to utility customers during the winter months. As discussed in greater detail in Exhibit B, Tab 2, Schedule 1, physical storage capacity is a critical component of the Gas Supply Plan and provides a low-cost and reliable method to mitigate weather/demand and price volatility by allowing Enbridge Gas to inject excess gas supply if demands are low and to withdraw when demands increase. Storage also mitigates supply interruption risk by providing a reliable and flexible on-

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<sup>5</sup> Assumes a 62% allocation of the storage space to the regulated utility per EB-2024-0111, Decision on Settlement Proposal and Interim Rate Order, Exhibit N, Tab 1, Schedule 1, p. 10.

<sup>6</sup> EB-2025-0065.

system source of supply.

26. Should the Waubuno Compressor Package experience a failure that prevents the Waubuno Storage Pool from being filled, the estimated annual financial impact based on market prices<sup>7</sup> to mitigate the lost storage space is approximately \$6.3 million. Using the maximum market prices observed over the past 10 years, the estimated annual impact to mitigate the lost storage space capacity would be approximately \$12.9 million. This range of financial consequences would mean approximately \$3.9 million to \$8.0 million of annual financial impact would be borne by utility rate payers.<sup>8</sup> The financial impact of \$12.9 million places it in the Very High-Risk category on the Enbridge Operational Risk Matrix, while a \$6.3 million impact would be classified as a High-Risk. As per Enbridge Gas's risk management requirements, all risks rated High or Very High must be treated to reduce exposure to acceptable levels.

#### **D. Waubuno Gathering System Integrity**

27. Previous Enbridge Gas inspection campaigns on the Waubuno Gathering System were conducted in 2005 and 2015. Since then, significant technical advancements, notable industry incidents, and evolving regulatory requirements have driven a more rigorous approach to assessing pipeline assets; particularly those susceptible to long-seam flaws. Across the industry, pipeline operators have enhanced their integrity management programs to recognize Long Seam Cracking (LSC) and Selective Seam Weld Corrosion (SSWC) as critical threats to health and safety. The Waubuno Gathering System has never undergone in-line inspection to evaluate these specific threats due to it having an incompatible configuration that prevents an in-line inspection from being performed. The most recent hazard assessment

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<sup>7</sup> Market prices were derived from the 10-year period between August 2013 to August 2023.

<sup>8</sup> Assumes a 62% allocation of the financial consequences to rate payers per EB-2024-0111, Decision on Settlement Proposal and Interim Rate Order, Exhibit N, Tab 1, Schedule 1, p. 10

completed on the pipeline system by Enbridge Gas found that the Waubuno Gathering Line and three well laterals were susceptible to LSC and SSWC hazards.

*Selective Seam Weld Corrosion*

28. Corrosion that preferentially affects the bondline and heat affected zone of the longitudinal seam of a pipeline, rather than the base metal of the pipe is referred to as SSWC. It is most often observed in pre-1970 pipelines that were manufactured using either direct-current electric resistance welding (DC-ERW) or low frequency electric resistance welding (LF-ERW) techniques.
29. Most factors causing SSWC are mainly related to limitations in manufacturing technology at the time or poor-quality control processes.
30. SSWC is a time-dependent threat where the potential risk of failure increases over the lifespan of a susceptible pipeline. Pipelines coated with tape or asphalt enamel coating may experience coating disbondment over time, increasing the likelihood of SSWC occurring, even if cathodic protection levels are managed within an acceptable range. From published industry reports, the time to failure due to SSWC based on available data ranged widely, between 17 and 74 years.
31. The Waubuno Gathering Line belongs to the class of steel transmission assets that was built pre-1970 and has asphalt enamel coating. Built in 1955, this asset is 70 years old and is within the age range where industry-SSWC incidents have been known to occur. Due to the multi-diameter design of the Waubuno Gathering Line (currently NPS 6, 8, and 10), the susceptibility persists as Enbridge Gas has been

unable to monitor the presence of SSWC with in-line inspections.

32. The interacting nature of SSWC threat presents an elevated risk as:

- i. Localized corrosion at the longitudinal weld seam occurs at a faster rate compared to the pipe body.
- ii. Pipe seams from pre-1970s generally exhibit low toughness and failures interacting with low toughness seams could result in rupture. Several notable rupture incidents involving SSWC are known to have occurred even at a relatively lower percentage of Specified Minimum Yield Strength.
- iii. SSWC could interact with stable manufacturing seam flaws (exposed to a pressure test) and cause a failure where such features would remain stable otherwise.

#### *Long Seam Cracking*

33. A crack present within the heat affected zone or the weld bondline of the longitudinal seam of a pipeline is referred to as LSC. Similar to SSWC, this hazard is predominantly found in the pre-1970s pipeline where manufacturing practices at the time resulted in features characterized as lack of fusion, cold welds, or hook flaws, amongst others. These localized stress concentration zones serve as starting points for cracks to initiate and propagate.

34. These manufacturing-related seam features are generally considered to be stable threats if they are successfully exposed to hydrostatic pressure testing. However, changes in pipeline operation such as operating pressure increases, or pressure cycling of storage pool assets, could lead to crack growth. This is especially true in low toughness seam welds of pre-1970s pipeline where fracture arrest provisions were rarely considered.

35. The Waubuno Gathering System has 1955 vintage LF-ERW seams. LF-ERW seams are known to contain seam-weld anomalies. The Waubuno Gathering System was pressure tested in 1979. The Waubuno Storage Pool PMOP increase was completed in 1988 (the same year in which the Waubuno Compressor Package was installed).
36. While the Waubuno Gathering System does not have an incident history related to LSC, prior integrity digs have revealed the presence of cold welds on the long-seam of certain sections of pipe. While these are not immediately concerning threats, localized areas such as these can cause stress concentrations leading to localized material yielding. This can cause crack-like features to form over the life of the asset.
37. Although rare, instances of failures in the industry have been known to occur due to long-seam cracking on LF-ERW welded pipelines.

#### *SSWC and LSC Treatment Alternatives*

38. As part of its Integrity Management Program, Enbridge Gas is required to monitor conditions which can lead to failures. SSWC can be detected and sized using circumferential magnetic flux leakage (CMFL) in-line inspection (ILI) technology; however, the Waubuno Gathering System cannot be traversed by CMFL tools in its current configuration. Retrofitting of the system has been considered, as has replacement using pipe and coatings not susceptible to SSWC. Note that CMFL technology is not presently available for NPS 4 pipelines, and therefore the retrofit option was not considered for the three well laterals.

#### *Gathering System Inspection Methods*

39. The Waubuno Gathering System is susceptible to LSC and SSWC threats. To address these, the system could either be replaced or reconfigured to enable in-line inspection. Conventional ILI is the most reliable and repeatable method, providing

precise data for integrity assessment and minimizing long-term capital costs.

Alternative inspection methods considered include:

- i. Direct Examination (DE) - Requires excavation and exposure of the entire system for non-destructive examination (NDE). This approach is resource-intensive, introduces environmental and safety risks due to ground disturbance and pipeline coating removal, and was therefore removed from consideration.
- ii. Direct Assessment (DA) - Non-intrusive inspection techniques that use alternative data sources (e.g., above ground signal data and historical telemetry data) to identify areas where threats could exist. These techniques, such as External Corrosion Direct Assessment (ECDA) and Internal Corrosion Direct Assessment (ICDA), address corrosion but cannot identify and risk-rank the threats associated with SSWC and LSC. Therefore, DA was removed from consideration.
- iii. Non-conventional In-line Inspection Tools - Tethered tools and robotic crawlers cannot navigate multi-diameter configurations in a single deployment. At least two tools would be required, along with retrofits for entry and exit of the pipeline that would entail either excavating and cutting into the pipeline or creating above ground facilities. CMFL crawler tools are unavailable for NPS 6, meaning upsizing of the existing 290 m of NPS 6 would be necessary. Additional limitations include:
  - Operational restrictions (system depressurization required for tethered tools) restricting the timing window in any given year for which a tethered in-line inspection would be feasible.

- Debris<sup>9</sup> interference with tether-less crawlers, reducing data quality.
- Lack of compatible cleaning tools for crawler configurations.

To achieve adequate data quality, it is necessary to clean the pipeline using cleaning tools prior to using in-line inspection tools. There are no known cleaning tools in the market today compatible with the configuration required for tether-less crawler tools. This limitation is not applicable to conventional in-line inspection as there is a large portfolio of cleaning tools available that have proven to be effective. For these reasons, non-conventional in-line inspection tools were removed from consideration.

40. The alternative inspection methodologies evaluated are not sustainable in the long-term for continual, repeatable, and efficient integrity assessment of the Waubuno Gathering System with respect to its LSC and SSWC threats. From a technical standpoint, all these methodologies have limitations with respect to the data they would provide on the long-seam condition of the pipeline. This would limit Enbridge Gas's ability to effectively assess and respond to the long-seam threats.

41. Due to the multi-diameter design of the Waubuno Gathering Line, any CMFL in-line inspection tool is restricted by its collapsibility to inspect for SSWC and LSC. Although it is possible to inspect each diameter of the gathering system independently, it is uneconomical to do so on a sustained basis due to the additional facilities and inspection tools required to enable multiple inspections. Enbridge Gas has determined that conventional in-line inspection is the preferred method to monitor the integrity threats associated with the Waubuno Gathering System. Upsizing sections of the Waubuno Gathering Line enables conventional in-line inspection and facilitates management of integrity concerns.

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<sup>9</sup> Debris is caused by typical impurities found within underground storage formations such as iron carbonate, calcite, iron sulfide, black powder, salt, and moisture.

## **E. Waubuno Gathering System Enhancements**

42. Following the establishment of the Preferred Alternative described in Exhibit C, Tab 1, Schedule 1 to meet the identified Project Need, Enbridge Gas subsequently reviewed the Waubuno Storage Pool's eligibility for future delta pressuring projects and/or increased withdrawal capability of the Waubuno Storage Pool, which would be paid for by the non-utility storage business. The Enbridge Gas non-utility business is proposing incremental project scope to ensure all new facilities associated with the Waubuno Storage Pool are adequately designed for future delta pressuring projects or incremental withdrawal projects. Enbridge Gas is not proposing incremental storage space capacity or withdrawal capability as part of this project.<sup>10</sup> Refer to Exhibit B, Tab 3, Schedule 1 for background on storage space regulation and Exhibit C, Tab 1, Schedule 1, and Exhibit D, Tab 1, Schedule 1 for a description of the non-utility enhancements.

## **F. Conclusions**

43. With respect to the Waubuno Compressor Package:

- i. The results of the RAM Study support that if no action is taken, reliability and obsolescence issues are exceeding risk exposure beyond acceptable levels per Company standards and will continue to escalate further increasing reliability risk. Ongoing reliance on shorter-term mitigants is not sustainable and a long-term solution is required.
- ii. If the Waubuno Compressor Package is not replaced and a failure occurred, 2.5 PJ of the total 199.7 PJ of regulated physical storage space would no longer be accessible and it would cost utility rate payers approximately \$3.9 million to \$8.0 million a year to mitigate the lost space. This regulated storage space is a critical component of the Gas Supply Plan and provides a

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<sup>10</sup> The incremental enhancements do not increase the Waubuno Storage Pool's Design Day withdrawal capability, on their own, without additional facility investment.

low-cost and reliable method to mitigate weather/demand and price volatility by allowing Enbridge Gas to inject excess gas supply if demands are low (e.g., when commodity prices are lower and less volatile) and to withdraw when demands increase (e.g., when prices are higher). Storage also allows Enbridge Gas to mitigate supply interruption risk by providing a reliable and flexible on-system source of supply.

- iii. The financial consequences of experiencing failure of the Waubuno Compressor Package place it in the High-Risk to Very High-Risk category on the Enbridge Operational Risk Matrix. As per Enbridge Gas's risk management requirements, all risks rated High or Very High must be treated to reduce exposure to acceptable levels.

44. The three compressor replacement alternatives evaluated to address the Project Need are detailed in Exhibit C, Tab 1, Schedule 1. The Preferred Alternative involves replacing the Waubuno Compressor Package with a new 1.1 km NPS 12 natural gas pipeline, which will connect to the NPS 36 Dawn to Corunna pipeline. This configuration enables the Waubuno Storage Pool to be filled to the PMOP of 8,570 kPag by providing a direct pathway to the Dawn Operations Center and utilizes existing compression, thereby eliminating the requirement for compression at the Waubuno Pool Station.

45. With respect to the Waubuno Gathering System, the asset is 70 years old and is within the age range where industry LSC and SSWC incidents have been known to occur and would require replacement or retrofit to accommodate in-line inspection. The alternative inspection methodologies evaluated are not sustainable in the long-term for continual, repeatable, and efficient integrity assessment of the Waubuno Gathering System with respect to its LSC and SSWC threats. From a technical standpoint, all these methodologies have limitations with respect to the data they

would provide on the long-seam condition of the pipeline. This would limit Enbridge Gas's ability to effectively assess and respond to the long-seam threats. The Preferred Alternative as outlined in Exhibit C, Tab 1, Schedule 1 requires replacement of the Waubuno Gathering System to accommodate in-line inspection and to address integrity concerns related to the Long Seam Cracking and Selective Seam Weld Corrosion hazards of the Waubuno Gathering System.

46. As detailed in Exhibit C, Tab 1, Schedule 1, the Company's alternatives assessment has concluded that the Preferred Alternative with enhancements to the Waubuno Gathering System is the proposed Project. The Waubuno Gathering System and Compressor Replacement Project is proposed to address the Project Need driven by reliability, obsolescence, and integrity concerns, and provides the ability to accommodate in-line inspection, and maintains adequate velocities for future delta pressuring. The Project realizes efficiencies by combining these needs into a streamlined Project with a single leave to construct application.

## ALTERNATIVES

1. The purpose of this Exhibit is to describe Enbridge Gas's analysis of alternatives that were considered to replace the Waubuno Compressor Package and Waubuno Gathering System. As discussed in Exhibit B, Tab 1, Schedule 1, Enbridge Gas has identified the need to abandon, remove and replace the Waubuno Compressor Package due to identified reliability and obsolescence concerns. Additionally, the Waubuno Gathering System requires replacement to accommodate in-line inspection to address integrity concerns. Accordingly, the outcome sought via the Preferred Alternative and ultimately the proposed Project is to address the identified concerns of the Waubuno Gathering System, and to maintain the existing 4 PJ of storage space capacity (2.5 PJ of utility space and 1.5 PJ of non-utility space) currently supported by the Waubuno Compressor Package.
  
2. This Exhibit is organized as follows:
  - A. Integrated Resource Planning
  - B. Assessment Criteria
  - C. Facility Alternatives
    - a) Compressor Replacement Alternatives
      - i) Compressor Replacement Alternative 1 (Preferred) - NPS 12 Natural Gas Pipeline
      - ii) Compressor Replacement Alternative 2 - Natural Gas Fired Compression
      - iii) Compressor Replacement Alternative 3 - Electric Drive Motor Compression
      - iv) Compressor Replacement Alternatives Summary
    - b) Gathering System Replacement
      - i) Gathering System Alternative 1 – NPS 8 and 10 Waubuno Gathering Line

- ii) Gathering System Alternative 2 (Preferred) - NPS 10 Waubuno Gathering Line
- iii) Gathering System Alternatives Summary
- c) Preferred Alternative and Enhancements
- D. Proposed Project Selection and Conclusion

### **A. Integrated Resource Planning**

3. The OEB Decision and Order for Enbridge Gas's Integrated Resource Planning Framework Proposal (EB-2020-0091) was issued on July 22, 2021. The Decision was accompanied by an Integrated Resource Planning Framework for Enbridge Gas (IRP Framework)<sup>1</sup>, which provides direction on the OEB's requirements as Enbridge Gas considers IRP to meet its system needs. The IRP Framework provides Binary Screening criteria to identify projects where there is a reasonable expectation that an IRP alternative could efficiently and economically meet a system need. The IRP Assessment Process has evolved to also include a Technical Screening stage, after the Binary Screening and prior to the Technical Evaluation being conducted.<sup>2</sup>
4. Enbridge Gas has applied the Technical Screening criteria and determined that the Project Need, which falls under the two investment asset classes of Compressor Stations and Storage Pools & Wells, does not warrant further IRP consideration.<sup>3</sup> This project is required to maintain existing physical storage space capacity and capability. Physical storage space also allows Enbridge Gas to mitigate supply interruption risk by providing a reliable and flexible source of supply. These types of investments cannot be offset by IRP alternatives and therefore have been screened out at the Technical Screening stage.

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<sup>1</sup> EB-2020-0091, Decision and Order, July 22, 2021, Appendix A.

<sup>2</sup> EB-2025-0064, Exhibit I.1.13-ED-4, Attachment 1, Appendix F - IRP Assessment Screening and Evaluation Guidelines. Filed July 4, 2025.

<sup>3</sup> Ibid., pp. 100 – 101.

## **B. Assessment Criteria**

5. Enbridge Gas established alternatives assessment criteria with consideration to economic feasibility, timing, safety and reliability, risk management, and environmental and socio-economic impact. Enbridge Gas used both quantitative and qualitative criteria assessments.
  
6. Enbridge Gas assessed each alternative that was identified to meet the system need using the following criteria (together, the Assessment Criteria):

### Economic Feasibility (Quantitative):

The preferred alternative must be cost-effective compared to other alternatives. Enbridge Gas used the following metrics to assess economic feasibility of alternatives:

- Total Capital Cost;
- Annual O&M and Capital Maintenance Cost; and
- Net Present Value (NPV).

### Timing (Quantitative)

The preferred alternative should promptly address the reliability, obsolescence, and integrity concerns with the Waubuno Compressor Package and Gathering System.

### Safety and Reliability (Qualitative)

The preferred alternative must:

- provide equivalent safe and reliable storage space to customers during the winter months and maintain injection capability to fill the pool; and
- accommodate in-line inspection and facilitate management of integrity concerns related to the Long Seam Cracking and Selective Seam Weld

Corrosion hazards of the Waubuno Gathering System.

Risk Management (Qualitative):

The preferred alternative must:

- address the risk of the compressor suffering a critical failure resulting in Enbridge Gas losing access to 4.0 PJ of storage space capacity; and
- accommodate in-line inspection to facilitate management of integrity concerns related to the Long Seam Cracking and Selective Seam Weld Corrosion hazards of the Waubuno Gathering System.

Environmental and Socio-economic Impact (Qualitative):

The preferred alternative should minimize impacts to the environment, Indigenous peoples, municipalities, and landowners relative to other viable alternatives.

**C. Facility Alternatives**

7. Enbridge Gas identified several facility alternatives to meet the identified system need. These include:

- a) Compressor Replacement Alternatives
- b) Gathering System Replacement Alternatives
- c) Preferred Alternative and Enhancements

**a) Compressor Replacement Alternatives**

8. Three facility alternatives for the Waubuno Compressor Package replacement were analyzed:

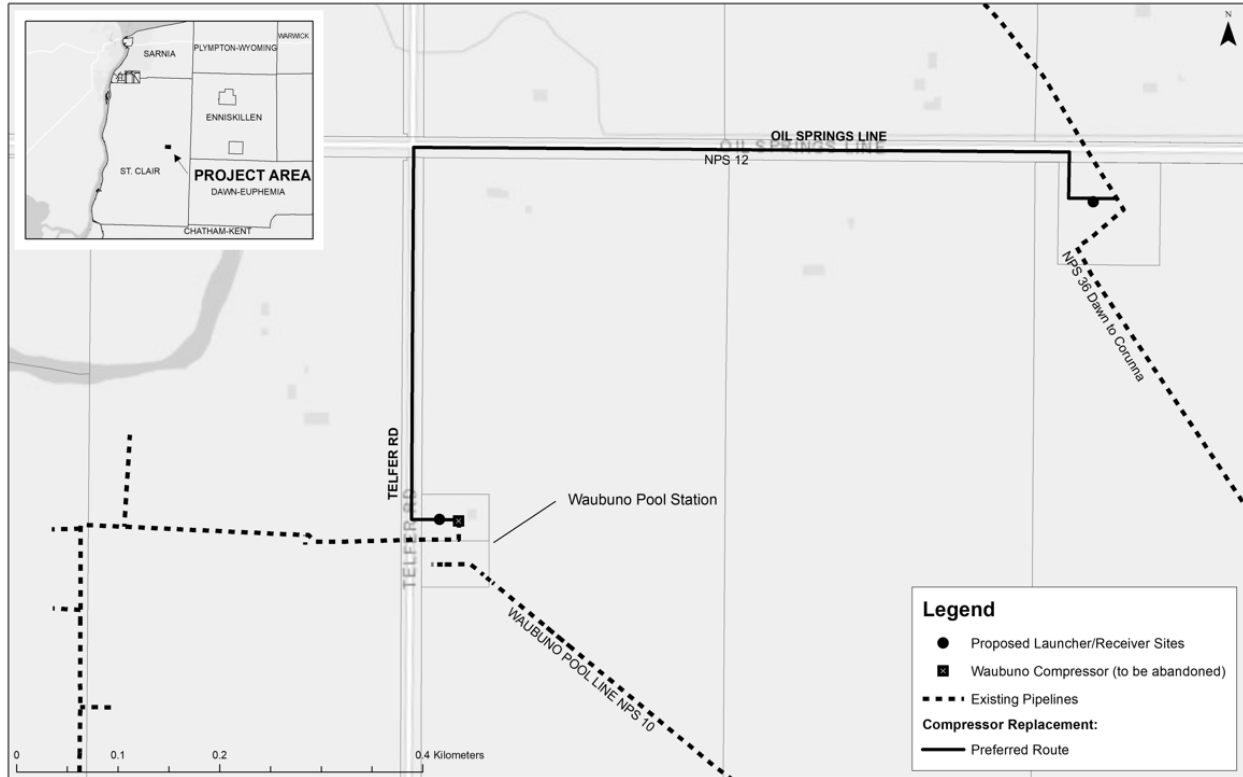
- i) Compressor Replacement Alternative 1 (Preferred) - NPS 12 Natural Gas Pipeline
- ii) Compressor Replacement Alternative 2 - Natural Gas Fired Compression

iii) Compressor Replacement Alternative 3 - Electric Drive Motor Compression

**i) Compressor Replacement Alternative 1 (Preferred) - NPS 12 Natural Gas Pipeline**

9. The replacement of the existing Waubuno Compressor Package with approximately 1.1 km of NPS 12 natural gas pipeline from the Waubuno Pool Station to the NPS 36 Dawn to Corunna pipeline provides an equivalent replacement of storage space and injection capability. This alternative also includes the installation of one NPS 12 launcher and one NPS 12 receiver, a rebuild of the Waubuno Pool Station, and the removal of the existing Waubuno Compressor Package and related facilities. A map showing the existing and proposed facilities in this alternative is shown in Figure 1.

**Figure 1: Map of Compressor Replacement Alternative 1**



10. The new connection to the NPS 36 Dawn to Corunna pipeline proposed in this alternative will allow the Waubuno Storage Pool to be filled to the PMOP of 8,570 kPag from the NPS 36 Dawn to Corunna pipeline using existing compression at Dawn, eliminating the need for compression at the Waubuno Pool Station. The proposed 1.1 km of NPS 12 natural gas pipeline will be used primarily for injection operations of the Waubuno Storage Pool. The Waubuno Storage Pool will continue to be filled from Dawn utilizing the existing NPS 10 Waubuno Pool pipeline up to a pressure of 6,550 kPag limited by the MOP of the existing NPS 10 Waubuno Pool pipeline<sup>4</sup>. Alternatively, depending upon the operational fit, the NPS 36 Dawn to Corunna pipeline and the proposed NPS 12 natural gas pipeline may be utilized to

<sup>4</sup> The MOP of the existing NPS 10 Waubuno Pool pipeline is 6,900 kPag.

fill the Waubuno Storage Pool up to a pressure of 6,550 kPag. Once the pool is filled to 6,550 kPag, higher pressure gas<sup>5</sup> from the existing Dawn compression will be routed through the NPS 36 Dawn to Corunna pipeline and into the proposed NPS 12 natural gas pipeline to allow the Waubuno Pool to be filled to the PMOP of 8,570 kPag.

11. During the withdrawal season, the NPS 10 Waubuno Pool pipeline will continue to be used to empty the Waubuno Storage Pool down to its cushion pressure of 2,000 kPag. Alternatively, depending upon the operational fit, the proposed NPS 12 natural gas pipeline and the NPS 36 Dawn to Corunna pipeline may be used to withdraw gas from the Waubuno Storage Pool during some periods of the withdrawal season. However, on Design Day, the pressure in the Waubuno Storage Pool will be at approximately 3,050 kPag and will not be able to flow through the NPS 36 Dawn to Corunna pipeline, which will be operating above 4,950 kPag to allow gas from the storage pools connected to the Corunna Compressor Station to flow through to Dawn compression. Therefore, on Design Day, the operation of the Waubuno Storage Pool will not be impacted by this alternative, and the Design Day withdrawal capability will remain the same.

12. As shown in Table 1, the economic analysis for the preferred Compressor Replacement Alternative 1 shows the NPV is \$(17.5) million, the capital cost estimate is \$21.1 million, and the annual O&M and capital maintenance cost is \$0.15 million.

13. Compressor Replacement Alternative 1 is the Preferred Alternative based on economic feasibility as it has the lowest total capital cost, lowest annual expenses, and the most favourable NPV compared to the other compressor replacement

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<sup>5</sup> Existing compression at the Dawn Operations Centre can provide up to 9,300 kPag of pressure.

alternatives. This alternative also simplifies Enbridge Gas's storage operations by reducing the amount of compressor assets which in turn reduces operating and maintenance costs associated with running the compressor, including on-site time to operate the compressor, routine maintenance, engine overhauls, replacement of mechanical parts and equipment. Additionally, by retiring the Waubuno Compressor Package, Enbridge Gas will eliminate a source of air and noise emissions on the site. Lastly, and as described further in Exhibit F, Tab 1, Schedule 1, the pipeline proposed for Compressor Replacement Alternative 1 was subject to a routing analysis to select a preferred route that reduces potential environmental and socio-economic impacts, and as a result is proposed to be located entirely within road allowance.

14. In addition, Compressor Replacement Alternative 1 promptly addresses the reliability, obsolescence, and integrity concerns with the Waubuno Compressor Package (proposed in-service date of September 1, 2027), provides equivalent safe and reliable storage space to customers during the winter months, maintains injection capability to fill the pool to its PMOP during the injection season, and maintains the 4.0 PJ of storage space capacity provided by the Waubuno Compressor Package.

15. For all these reasons, the Company has determined that Compressor Replacement Alternative 1 is preferred to address the Project Need specific to the Waubuno Compressor Package replacement.

**ii) Compressor Replacement Alternative 2 - Natural Gas Fired Compression**

16. The replacement of the existing Waubuno Compressor Package with a new gas fired reciprocating engine and compressor provides an equivalent replacement in horsepower and thus maintains the existing storage space capacity and injection

capability. This alternative also includes a rebuild of the Waubuno Pool Station, and the removal of the existing Waubuno Compressor Package and related facilities.

17. Natural gas fired compression has higher operating and maintenance costs compared to Compressor Replacement Alternative 1 based on standard operating practices to maintain the compressor, including on-site time to operate the compressor, routine maintenance, engine overhauls, and replacement of mechanical parts and equipment.
18. As shown in Table 1, the economic analysis for Compressor Replacement Alternative 2 shows the NPV is \$(20.8) million, the capital cost estimate is \$22.8 million, and the annual O&M and capital maintenance cost is \$0.32 million.
19. The capital cost and annual O&M and capital maintenance cost of Compressor Replacement Alternative 2 are higher and the NPV is lower than Compressor Replacement Alternative 1.
20. Compressor Replacement Alternative 2 satisfies the timing, safety and reliability, and risk management assessment criteria. From an environmental and socio-economic perspective, the alternative of replacing the compressor with a new gas-powered compressor would not eliminate air and noise emissions at the site, but would have a smaller overall project footprint compared to a pipeline alternative.
21. Compressor Replacement Alternative 2 is not preferable based on the economic feasibility criteria due to the lower NPV, higher capital cost, and annual maintenance costs than Compressor Alternative 1.

### **iii) Compressor Replacement Alternative 3 - Electric Drive Motor Compression**

22. The replacement of the existing Waubuno Compressor Package with a new electric drive motor (EMD) engine and reciprocating compressor provides an equivalent replacement in horsepower and thus maintains the existing storage space capacity and injection capability. This alternative also includes a rebuild of the Waubuno Pool Station, and removal of the existing Waubuno Compressor Package and related facilities. This alternative does not include the additional costs for required electrical upgrades to provide reliable power to the EMD unit.
23. EMD compression has higher operating and maintenance costs compared to Compressor Replacement Alternative 1 based on standard operating practices to maintain the compressors including on-site time to operate the compressor, routine maintenance, engine overhauls, and replacement of mechanical parts and equipment. The estimated cost of electricity associated with the operation of the EMD compressors was included.
24. As shown in Table 1, the economic analysis for Compressor Replacement Alternative 3 shows the NPV is \$(22.4) million, the capital cost estimate is \$22.3 million, and the annual O&M and capital maintenance cost is \$0.48 million.
25. Compressor Replacement Alternative 3 satisfies the timing, safety and reliability, and risk management assessment criteria. From an environmental and socio-economic perspective, this alternative would be eliminating air emissions and would have a smaller overall project footprint compared to a pipeline alternative. However, this alternative would require additional upgrades to provide reliable power to the EMD unit and annual costs for electricity to operate the unit. Compressor Replacement Alternative 3 is therefore not preferable based on the economic

feasibility criteria due to the lower NPV, higher capital cost, and annual maintenance costs than Compressor Alternative 1.

**Table 1: Economics for the Compressor Replacement Alternative Analysis**

<b>Compressor Replacement Alternative</b>	<b>Total Capital Cost (\$ Million)<sup>6</sup></b>	<b>Annual O&amp;M and Capital Maintenance Cost (\$ Million)</b>	<b>NPV<sup>7</sup> (\$ Million)</b>
<b>1. NPS 12 Natural Gas Pipeline (Preferred)</b>	21.1	0.15	(17.5)
<b>2. Natural Gas Fired Compression</b>	22.8	0.32	(20.8)
<b>3. Electric Motor Drive Compression</b>	22.3	0.48	(22.4)

**iv) Compressor Replacement Alternatives Summary**

26. Based on the Alternative Assessment criteria noted above, Enbridge Gas has selected Compressor Replacement Alternative 1 – NPS 12 Natural Gas Pipeline as the preferred alternative to replace the Waubuno Compressor Package. Compressor Replacement Alternative 1 is the most economic option given the lowest capital cost, the lowest annual O&M and capital maintenance cost, and the highest NPV. The opportunity to replace compression with a pipeline alternative simplifies operation by removal of compressor assets and improves emission performance. It also satisfies the timing criteria (proposed in-service date of September 1, 2027) and provides benefits due to lower emissions by eliminating an additional compressor and utilizing existing compression at Dawn Operations Center. Lastly, and as described further in Exhibit F, Tab 1, Schedule 1, the natural gas pipeline proposed for Compressor

<sup>6</sup> Capital costs reflect Class 5 estimates and includes IDC.

<sup>7</sup> See Attachment 1 to this Exhibit for details of NPV analysis. Brackets indicate a negative NPV.

Replacement Alternative 1 was subject to a routing analysis to select a preferred route that reduces potential environmental and socio-economic impacts.

### **b) Gathering System Replacement**

27. Two facility alternatives for the Waubuno Gathering System replacement were analyzed:

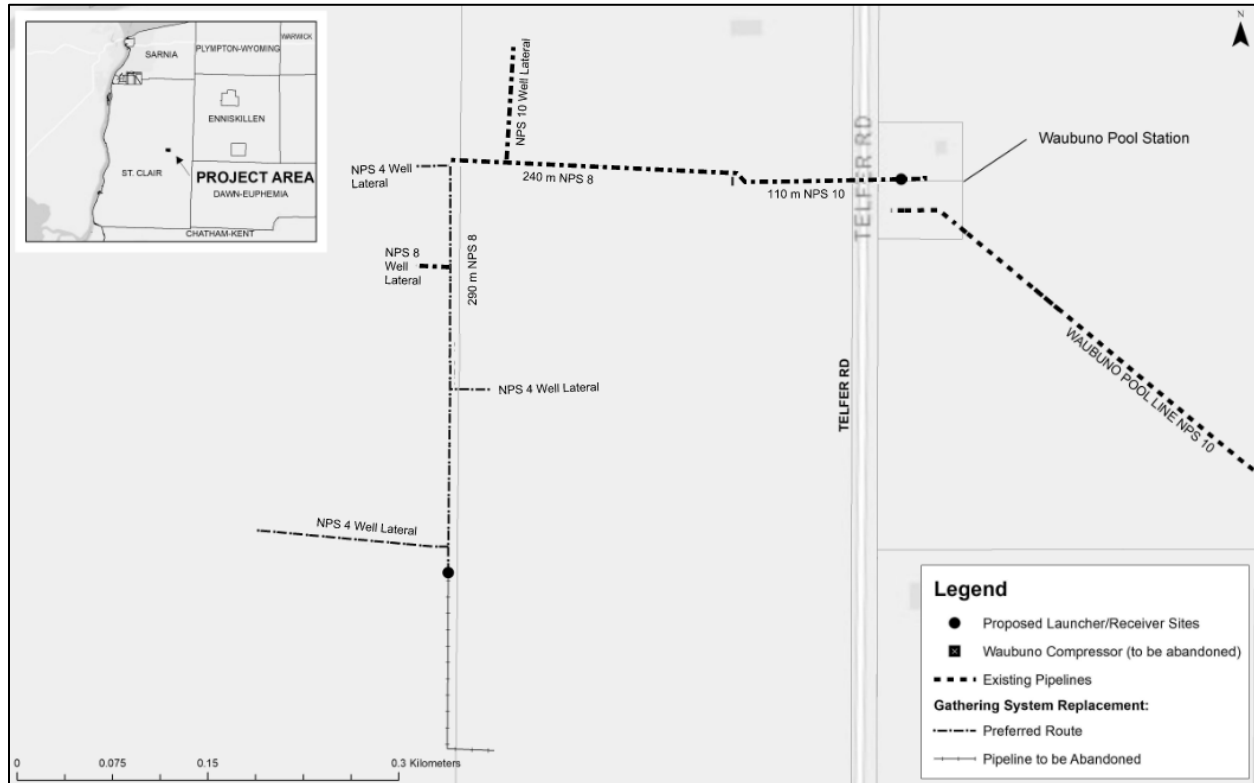
- i) Gathering System Alternative 1 – NPS 8 and 10 Waubuno Gathering Line
- ii) Gathering System Alternative 2 (Preferred) – NPS 10 Waubuno Gathering Line

#### **i) Gathering System Alternative 1 – NPS 8 and NPS 10 Waubuno Gathering Line**

28. Gathering System Alternative 1 involves upsizing the entire 290 m section of the NPS 6 Waubuno Gathering Line to NPS 8, “like-for-like” replacement of three NPS 4 well laterals, and one NPS 8 launcher and one NPS 10 receiver to facilitate in-line inspection of the Waubuno Gathering Line and eliminate the integrity risks associated with the well laterals. This alternative also includes leaving approximately 240 m of NPS 8 pipeline and 110 m of NPS 10 pipeline, originally installed in 1955 as part of the Waubuno Gathering Line, in place.

29. This alternative, shown in Figure 2, represents the minimum requirements necessary to permit conventional in-line inspection of the Waubuno Gathering Line. This is the scope of the Waubuno Gathering System replacement as a standalone integrity project and does not include consideration of compressor replacement alternatives.

**Figure 2: Map of Gathering System Alternative 1**



30. The integrity risks associated with the existing sections of the 110 m of NPS 10 and 240 m of NPS 8 pipelines will be managed through available dual diameter NPS 8 and 10 conventional in-line inspection tools that will inform the Enbridge Gas Integrity Plan and prescription of repairs, where necessary.

31. In addition to the Waubuno Gathering Line, there are three NPS 4 well laterals within the Waubuno Gathering System that were installed in 1955. There are no in-line inspection tools available that allow Enbridge Gas to inspect these assets in their current configurations. Replacement of these assets with “like-for-like” NPS 4 pipelines was therefore determined to be the best option with respect to eliminating the associated integrity risks.

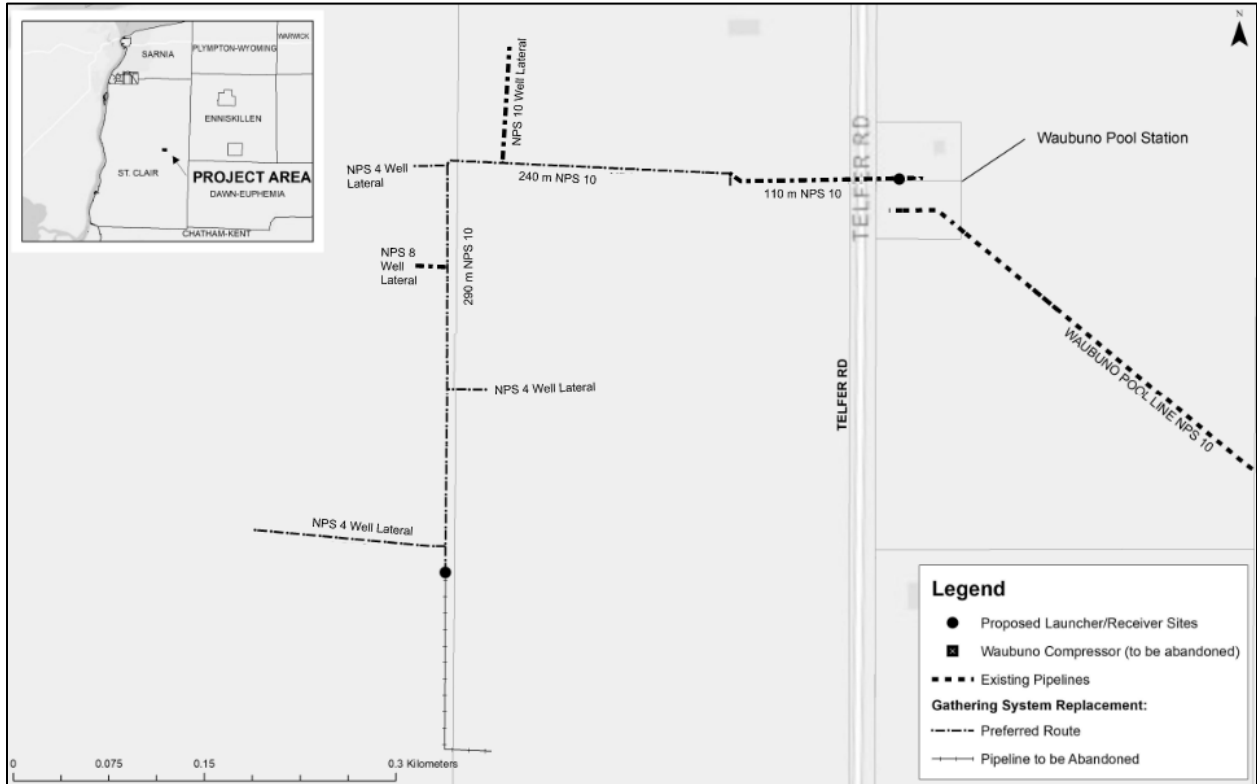
32. As shown in Table 2, the economic analysis for Gathering System Alternative 1 shows the NPV is \$(9.1) million, the capital cost estimate is \$9.0 million, and the annual O&M and capital maintenance cost is \$0.25 million.

33. Gathering System Alternative 1 satisfies the timing criteria (proposed in-service date of November 1, 2026). From a safety, reliability, and risk management perspective the alternative enables sustainable, long-term, repeatable, and efficient integrity assessment of the Waubuno Gathering System with respect to its LSC and SSWC threats. From an environmental and socio-economic perspective, the proposed work is limited to the existing site location and reduces the risk of failure due to LSC and SSWC.

**ii) Gathering System Alternative 2 – NPS 10 Waubuno Gathering Line (Preferred)**

34. Gathering System Alternative 2, as shown in Figure 3, involves upsizing the 240 m of NPS 8 and 290 m of NPS 6 sections of the Waubuno Gathering Line to 530 m of NPS 10, “like-for-like” replacement of three NPS 4 well laterals, and one NPS 10 launcher and one NPS 10 receiver to facilitate in-line inspection of the Waubuno Gathering Line and to eliminate the integrity risks associated with the well laterals. The existing 110 m of NPS 10 Waubuno Gathering Line would remain.

**Figure 3: Map of Gathering System Alternative 2**



35. This alternative combined with Compressor Replacement Alternative 1 is the more efficient option, addressing the two distinct project needs simultaneously.

36. The single-diameter Waubuno Gathering Line allows for the option to inspect the Waubuno Gathering System’s NPS 10 pipeline, including the remaining 110 m of existing NPS 10, concurrently with the proposed NPS 12 natural gas pipeline (Compressor Replacement Alternative 1)<sup>8</sup> as one continuous system using conventional dual diameter NPS 10 and NPS 12 in-line inspection tools available. By configuring the system in such a manner, the requirement of launcher-receiver

<sup>8</sup> Gathering System Alternative 1 requires launcher/receiver facilities for each: i) proposed NPS 12 Natural Gas Pipeline (Compressor Replacement Alternative 1) and ii) the Gathering System replacement.

facilities at the Waubuno Pool Station can be eliminated and in turn, only one pair of launcher-receiver would be required. This minimizes the direct capital costs associated with this alternative.

37. The three NPS 4 well laterals would be replaced with “like-for-like” NPS 4 pipelines.

38. For the purposes of asset integrity and reliability, Gathering System Alternative 2 provides the greatest amount of compatibility associated with the compressor replacement facility alternatives as it minimizes above-ground infrastructure, allows for inspections to be performed with comparatively mature technologies, makes use of existing operational expertise and minimizes operational costs.

39. As shown in Table 2, the economic analysis for Gathering System Alternative 2 shows the NPV is \$(8.2) million, the capital cost estimate is \$7.9 million, and the annual O&M and capital maintenance cost is \$0.23 million.

40. The economic analysis confirms that by upsizing the Waubuno Gathering Line to NPS 10 to allow for continuous inspection with the proposed NPS 12 natural gas pipeline (Compressor Replacement Alternative 1), Gathering System Alternative 2 has the lowest capital cost estimate, the lowest annual O&M and capital maintenance cost, and the more favourable NPV. The alternative satisfies the timing criteria (proposed in-service date of November 1, 2026). From a safety, reliability, and risk management perspective, this alternative enables sustainable, long-term, repeatable, and efficient integrity assessment of the Waubuno Gathering System with respect to its LSC and SSWC threats. From an environmental and socio-economic perspective, the proposed work is limited to the existing site location and reduces the risk of failure due to LSC and SSWC.

Table 2: Economics for the Gathering System Replacement Alternatives

Gathering System Alternative	Total Capital Cost (\$ Million) <sup>9</sup>	Annual O&M and Capital Maintenance Cost (\$ Million)	NPV <sup>10</sup> (\$ Million)
1. NPS 8 and 10 Waubuno Gathering Line	9.0	0.25	(9.1)
2. NPS 10 Waubuno Gathering Line (Preferred)	7.9	0.23	(8.2)

**c) Preferred Alternative and Enhancements**

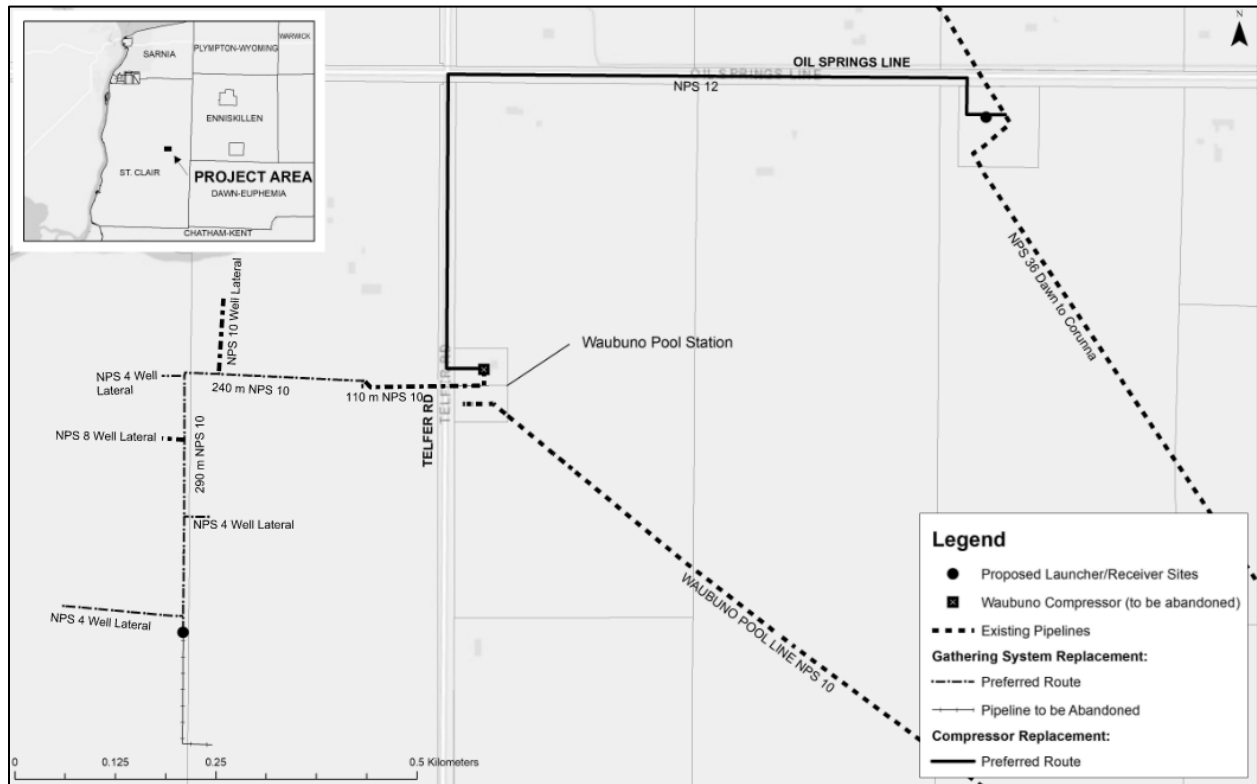
41. The Preferred Alternative as shown in Figure 4 is a combination of the Compressor Replacement Alternative 1 with Gathering System Alternative 2 and includes:

- installing 1.1 km of NPS 12 natural gas pipeline from the existing Waubuno Pool Station to a new tie-in valve site with the existing NPS 36 Dawn to Corunna Pipeline;
- removal of the existing Waubuno Compressor Package and related infrastructure;
- rebuilding the Waubuno Pool Station;
- replacing and upsizing 290 m of NPS 6 gathering line with NPS 10;
- replacing and upsizing 240 m of NPS 8 gathering line with NPS 10;
- replacing “like-for-like” of three NPS 4 well laterals; and
- installing one NPS 10 receiver and one NPS 12 launcher.

<sup>9</sup> Capital costs reflect Class 5 estimates includes IDC.

<sup>10</sup> See Attachment 1 to this Exhibit for details of NPV analysis. Brackets indicate a negative NPV.

**Figure 4: Map of the Preferred Alternative**



42. If the Waubuno Compressor Package and Waubuno Gathering System replacements were not combined into a single project, the combined capital cost of the preferred compressor replacement alternative (Compressor Replacement Alternative 1) with the preferred gathering system replacement alternative (Gathering System Alternative 2) would be \$30.9 million. By combining the two into a single project, savings of approximately \$5.4 million are expected to be realized based on efficiencies related to design, permitting, regulatory, internal labour, inspection, and construction.

43. Following the establishment of the Preferred Alternative to adequately address the Project Need discussed in Exhibit B, Tab 1, Schedule 1, Enbridge Gas subsequently reviewed the Waubuno Storage Pool's eligibility for delta pressuring to ensure

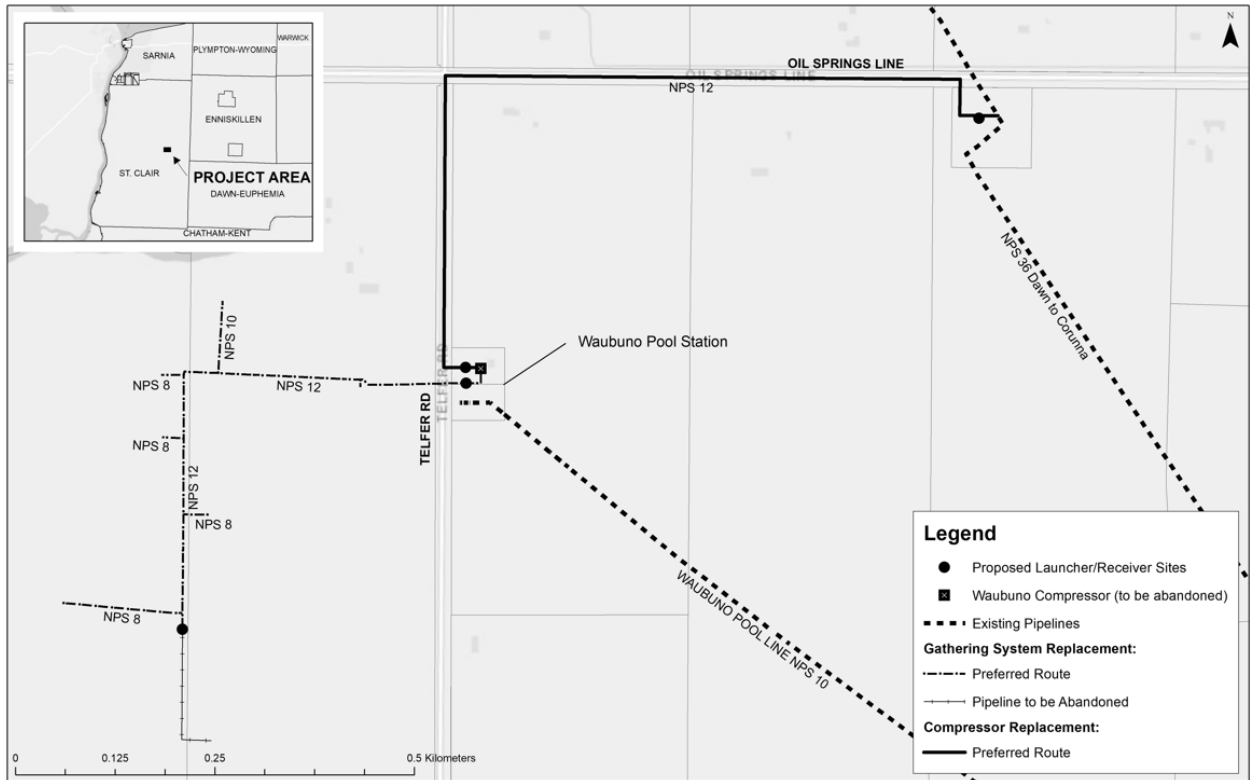
alignment with future operations. Enbridge Gas evaluated whether the Preferred Alternative would be compatible with future delta pressuring projects and/or increased withdrawal capability of the Waubuno Storage Pool, which would be paid for by the non-utility storage business. The Enbridge Gas non-utility business is proposing project enhancements to ensure all new facilities associated with the Waubuno Storage Pool are adequately designed for future projects such that the pipelines are sized to maintain adequate flow velocities for future delta pressure projects or incremental withdrawal capability projects. Enbridge Gas is not proposing incremental storage capacity or withdrawal capability as part of this application.<sup>11</sup>

44. The incremental enhancements (Waubuno Gathering System Enhancements), as shown in Figure 5, include upsizing the proposed 530 m of NPS 10 Waubuno Gathering Line replacement to NPS 12, upsizing the existing 110 m of NPS 10 (which would have otherwise remained in place) to NPS 12 and upsizing the proposed NPS 10 receiver to an NPS 12 receiver. The resulting proposed Waubuno Gathering Line becomes 640 m of NPS 12. Additionally, the Waubuno Gathering System Enhancements include upsizing the three NPS 4 well lateral replacements to NPS 8, and “like-for-like” replacement of one existing NPS 8 well lateral and one NPS 10 well lateral.

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<sup>11</sup> The incremental enhancements do not increase the Waubuno Storage Pool’s Design Day withdrawal capability, on their own, without additional facility investment.

**Figure 5: Map of the Preferred Alternative with Waubuno Gathering System Enhancements (Proposed Project)**



45. The Waubuno Gathering System Enhancements were excluded from the alternatives analysis based on these upgrades being incremental to the Preferred Alternative and will be paid for by the non-utility business. Please refer to Exhibit B, Tab 3, Schedule 1 for a discussion on storage cost allocation.

46. For further clarity on the proposed facilities for (i) the Preferred Alternative and (ii) the Preferred Alternative with the Waubuno Gathering System Enhancements (i.e., the proposed Project), please see Table 3 below.

Table 3: Project Component Comparison Table

Components	Preferred Alternative	Preferred Alternative with Enhancements (Proposed Project)
NPS 10 Waubuno Gathering Line	530 m	0 m
NPS 12 Waubuno Gathering Line	0 m	640 m
NPS 12 from Waubuno Pool Station to NPS 36 Dawn to Corunna Pipeline	1100 m	1100 m
NPS 12 launcher/receiver	1	2
NPS 10 launcher/receiver	1	0
NPS 4 Well Lateral Replacement	195 m	0 m
NPS 8 Well Lateral Replacement	0 m	220 m
NPS 10 Well Lateral Replacement	0 m	87 m
New tie-in-valve site	Yes	Yes
Remove Waubuno Compressor	Yes	Yes
Rebuild Waubuno Pool Station	Yes	Yes

**D. Proposed Project Selection and Conclusion**

47. As discussed in Exhibit B, Tab 1, Schedule 1, maintaining 2.5 PJ of regulated physical storage space allows Enbridge Gas to mitigate supply interruption risk and provides reliable and flexible supply. Further to this, the financial consequences of experiencing a critical failure and losing access to the 2.5 PJ of regulated storage space would negatively impact rate payers as they would not benefit from the entirety of the existing 199.7 PJ of utility storage in the Gas Supply Plan. In order to address the identified Project Need, the proposed Project for which Enbridge Gas is seeking leave to construct is the Preferred Alternative which consists of Compressor Replacement Alternative 1 (NPS 12 Natural Gas Pipeline) combined with Gathering System Alternative 2 (NPS 10 Waubuno Gathering Line) plus the Waubuno Gathering System Enhancements (as described in Table 3 above). Compressor Replacement Alternative 1 is the most economically feasible based on NPV, lowest annual expense, and lowest capital cost. This alternative simplifies Enbridge Gas

storage operations by reducing the amount of compressor assets which in turn reduces operating and maintenance costs associated with running the compressor, including on-site time to operate the compressor, routine maintenance, engine overhauls, and replacement of mechanical parts, and equipment. Additionally, by retiring the compressor, Enbridge Gas will eliminate a source of local air and noise emissions at the site. Gathering System Alternative 2 minimizes above-ground infrastructure, allows for in-line inspection, and minimizes operational costs. Furthermore, the enhancements proposed to upsize the Waubuno Gathering Line to NPS 12 ensures the entire Waubuno Gathering System including the newly installed facilities will be compatible with delta pressuring in the future.

## PROPOSED PROJECT

1. The Exhibit is organized as follows:

- A. Project Description
- B. Design Specifications
- C. Pipeline Construction
- D. Project Timing
- E. TSSA Correspondence

### **A. Project Description**

2. As described in Exhibit B, Tab 1, Schedule 1, Enbridge Gas has identified the need to abandon, remove and replace the Waubuno Compressor Package due to identified reliability and obsolescence concerns. Subsequently, the storage capacity and injection capability of the Waubuno Storage Pool needs to be maintained after the Waubuno Compressor Package is removed. Additionally, the Waubuno Gathering System requires replacement to accommodate in-line inspection to address integrity concerns.
3. To meet the identified project need, and to ensure the proposed facilities are compatible with future delta pressuring of the Waubuno Storage Pool, Enbridge Gas is proposing the following facilities (the Project):
- a. Installation of approximately 1.1 km of NPS 12 steel natural gas pipeline with a MOP of 9,308 kPag. The Preferred Route (PR) of the new NPS 12 natural gas pipeline is proposed to tie-in to the existing Waubuno Pool Station at 2550 Tefler Road, run northerly along the west side of Tefler Road to Oil Springs Line, and then run easterly along the south side of Oil Springs Line to tie into Enbridge Gas's existing NPS 36 Dawn to Corunna pipeline across from 2222 Oil Springs Line in St. Clair Township.

- b. Abandonment of approximately 190 m of NPS 4<sup>1</sup>, 290 m of NPS 6, 240 m of NPS 8, and 110 m of NPS 10 natural gas pipelines that comprise the Waubuno Gathering Line and replacement with approximately 640 m of NPS 12 steel natural gas pipelines with a MOP of 9,308 kPag.
- c. Replacement of three existing NPS 4 steel natural gas pipeline well laterals totaling 195 m with NPS 8 steel natural gas pipelines with a MOP of 9,308 kPag within the Waubuno Gathering System.
- d. Like-for-like replacement of 25 m of existing NPS 8 steel natural gas pipeline well lateral and 87 m of existing NPS 10 steel natural gas pipeline well lateral with a MOP of 9,308 kPag within the Waubuno Gathering System.
- e. Rebuild of the existing Waubuno Pool Station at 2550 Tefler Road to accommodate the tie-ins for the new NPS 12 natural gas pipeline and the new NPS 12 Waubuno Gathering Line. Removal of the existing Waubuno Compressor will also be completed during the rebuild.<sup>2</sup>
- f. Installation of a new launcher and Valve Site on Enbridge Gas-owned property across from 2222 Oil Springs Line to facilitate the tie-in of the new NPS 12 natural gas pipeline to the existing NPS 36 Dawn to Corunna pipeline. The site will also include the installation of an in-line inspection barrel, enabling continuous inspection of both the Waubuno Gathering Line and the new NPS 12 natural gas pipeline connected to the NPS 36 Dawn to Corunna pipeline.<sup>3</sup>

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<sup>1</sup> The existing 190 m section of NPS 4 gathering line will not be replaced as it previously serviced a natural gas storage well that was recently abandoned.

<sup>2</sup> Enbridge Gas is not seeking approvals from the OEB to rebuild the Waubuno Pool Station but has included the costs of these facilities as Ancillary Facilities costs within Exhibit E, Tab 1, Schedule 1.

<sup>3</sup> Enbridge Gas is not seeking approvals from the OEB to install the new Launcher and Valve Site but has included the costs of these facilities as Ancillary Facilities costs within Exhibit E, Tab 1, Schedule 1.

- g. Installation of a new NPS 12 receiver at the end of the Waubuno Gathering Line. This site will consist of an in-line inspection barrel, filter-separator and atmospheric tank.<sup>4</sup>
4. A map of the Project can be found at Attachment 1 to Exhibit A, Tab 2, Schedule 1.
5. The pipeline requirements for the Project are summarized in Table 1 and discussed in greater detail below.

Table 1: Proposed Facilities

Facility	Approximate Pipeline Length (m)	Nominal Pipe Size (inches)	Material	Maximum Operating Pressure (kPag)
Pipe (Mainline)	1,100	12	Carbon Steel	9,308
Pipe (Gathering Line)	640	12	Carbon Steel	9,308
Pipe (Well Laterals)	220 / 87	8 / 10	Carbon Steel	9,308

## B. Design Specifications

6. All design, installation and testing of the proposed pipeline will be done in accordance with the specifications outlined in Enbridge Gas's Construction and Maintenance Manual, and Gas Distribution Engineering GDS Document Library (Specifications),<sup>5</sup> and with the requirements of *Ontario Regulation 210/01 Oil and Gas Pipeline Systems* under the *Technical Standards and Safety Act, 2000*.

<sup>4</sup> Enbridge Gas is not seeking approvals from the OEB to install the new Receiver Site but has included the costs of these facilities as Ancillary Facilities costs within Exhibit E, Tab 1, Schedule 1.

<sup>5</sup> The Specifications meet or exceed the requirements of *CSA Z662 – Oil and Gas Pipeline System standard and Ontario Regulation 210/01, Oil and Gas Pipeline Systems*.

7. The design meets or exceeds the requirements of *CSA Z662 Standard for Oil and Gas Pipeline Systems* (latest edition) (CSA Z662) in accordance with the Technical Standard and Safety Authority (TSSA) Code Adoption Document for Oil and Gas Pipeline Systems, as amended from time to time.
8. The Project is designed according to Class 3 locations, as defined by CSA Z662.
9. The proposed pipeline will be manufactured in accordance with the requirements set out in *CSA Z245.1 Steel Line Pipe Standard for Pipeline Systems and Materials* (latest edition). The design and pipeline parameters for the Project are set out in Table 2, Table 3, Table 4, and Table 5.

Table 2: NPS 12 Steel Pipeline from Waubuno Pool Station to NPS 36 Dawn to Corunna Pipeline Design Specifications

<b>Description</b>	<b>Design Specification</b>	<b>Unit</b>
External Diameter (OD)	323.9	mm
Wall Thickness	9.5 (Open Cut)/12.7 (Trenchless)	mm
Pipe Grade	359	MPa
Material Specification	CSA Z245.1	-
Material Toughness	Cat I	-
Coating Type	ARO/FBE	
Material Designation	Steel	-
Cathodic Protection	Galvanic or impressed current	
<b><u>Components</u></b>		
Fittings	CSA Z245.11	-
Flanges	CSA Z245.12	-
Valves	CSA Z245.15	-
<b><u>Design Data</u></b>		
Class Location	3	-
Design Pressure (DP)	9928	kPa

Hoop Stress at Design Pressure per % SMYS	9.5mm WT: 48%, 12.7mm WT: 36%	-
Maximum Operating Pressure (MOP)	9308	kPa
Hoop Stress at MOP per % SMYS	9.5mm WT: 45%, 12.7mm WT: 34%	-
Minimum Depth of Cover	1.2	m
Method of Construction	Trenchless / Open Cut	-
<b><u>Strength Test Data</u></b>		
Test Medium	Water	-
Test Pressure (Min/Max)	13900/14893	kPa
Hoop Stress at Strength Test per % SMYS	9.5mm WT: 66%/71% 12.7mm WT: 50%/53%	-
Test Duration	4	Hrs
<b><u>Leak Test Data</u></b>		
Test Medium	Water	-
Test Pressure (Min/Max)	10922/13900	kPa
Hoop Stress at Leak Test per % SMYS	9.5mm WT: 52%/66% 12.7mm WT: 39%/50%	-
Test Duration	4	Hrs

**Table 3: NPS 12 Steel Gathering Line Pipeline Design Specifications**

<b>Description</b>	<b>Design Specification</b>	<b>Unit</b>
External Diameter (OD)	323.9	mm
Wall Thickness	9.5	mm
Pipe Grade	359	MPa
Material Specification	CSA Z245.1	-
Material Toughness	Cat I	-
Coating Type	ARO/FBE	
Material Designation	Steel	-
Cathodic Protection	Galvanic or impressed current	
<b><u>Components</u></b>		
Fittings	CSA Z245.11	-
Flanges	CSA Z245.12	-
Valves	CSA Z245.15	-
<b><u>Design Data</u></b>		
Class Location	3	-
Design Pressure (DP)	9928	kPa

Hoop Stress at Design Pressure per % SMYS	47%	-
Maximum Operating Pressure (MOP)	9308	kPa
Hoop Stress at MOP per % SMYS	44%	-
Minimum Depth of Cover	1.2	m
Method of Construction	Open Cut	-
<b><u>Strength Test Data</u></b>		
Test Medium	Water	-
Test Pressure (Min/Max)	13900/14893	kPa
Hoop Stress at Strength Test per % SMYS	66%/71%	-
Test Duration	4	Hrs
<b><u>Leak Test Data</u></b>		
Test Medium	Water	-
Test Pressure (Min/Max)	10922/13900	kPa
Hoop Stress at Strength Test per % SMYS	52%/66%	-
Test Duration	4	Hrs

**Table 4: NPS 10 Steel Well Lateral Pipeline Design Specifications**

<b>Description</b>	<b>Design Specification</b>	<b>Unit</b>
External Diameter (OD)	273.1	mm
Wall Thickness	9.3	mm
Pipe Grade	359	MPa
Material Specification	CSA Z245.1	-
Material Toughness	Cat I	-
Coating Type	ARO/FBE	-
Material Designation	Steel	-
Cathodic Protection	Galvanic or impressed current	-
<b><u>Components</u></b>		
Fittings	CSA Z245.11	-
Flanges	CSA Z245.12	-
Valves	CSA Z245.15	-
<b><u>Design Data</u></b>		
Class Location	3	-
Design Pressure (DP)	9928	kPa
Hoop Stress at Design Pressure per % SMYS	41%	-
Maximum Operating Pressure (MOP)	9308	kPa
Hoop Stress at MOP per % SMYS	38%	-

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Minimum Depth of Cover	1.2	m
Method of Construction	Open Cut	-
<b><u>Strength Test Data</u></b>		
Test Medium	Water	-
Test Pressure (Min/Max)	13900/14893	kPa
Hoop Stress at Strength Test per % SMYS	57%/61%	-
Test Duration	4	Hrs
<b><u>Leak Test Data</u></b>		
Test Medium	Water	-
Test Pressure (Min/Max)	10922/13900	kPa
Hoop Stress at Strength Test per % SMYS	45%/57%	-
Test Duration	4	Hrs

**Table 5: NPS 8 Steel Well Lateral Pipeline Design Specifications**

<b>Description</b>	<b>Design Specification</b>	<b>Unit</b>
External Diameter (OD)	219.1	mm
Wall Thickness	8.2	mm
Pipe Grade	359	MPa
Material Specification	CSA Z245.1	-
Material Toughness	Cat I	-
Coating Type	ARO/FBE	
Material Designation	Steel	-
Cathodic Protection	Galvanic or impressed current	
<b><u>Components</u></b>		
Fittings	CSA Z245.11	-
Flanges	CSA Z245.12	-
Valves	CSA Z245.15	-
<b><u>Design Data</u></b>		
Class Location	3	-
Design Pressure (DP)	9928	kPa
Hoop Stress at Design Pressure per % SMYS	37%	-
Maximum Operating Pressure (MOP)	9308	kPa
Hoop Stress at MOP per % SMYS	35%	-
Minimum Depth of Cover	1.2	m
Method of Construction	Open Cut	-

<b><u>Strength Test Data</u></b>		
Test Medium	Water	-
Test Pressure (Min/Max)	13900/14893	kPa
Hoop Stress at Strength Test per % SMYS	52%/56%	-
Test Duration	4	Hrs
<b><u>Leak Test Data</u></b>		
Test Medium	Water	-
Test Pressure (Min/Max)	10922/13900	kPa
Hoop Stress at Strength Test per % SMYS	41%/52%	-
Test Duration	4	Hrs

10. The proposed pipelines will be strength and leak tested after the installation of the pipe, for a minimum duration as shown in Tables 2, 3, 4 and 5.

### **C. Pipeline Construction**

11. Enbridge Gas will construct the Project using qualified construction contractors and Enbridge Gas employees. Each of these groups will follow approved construction Specifications, which will be adjusted to reflect site-specific conditions for the Project as per the findings in the ER discussed in Exhibit F, Tab 1, Schedule 1. All construction, installation and testing of the Project will be witnessed and certified by a valid Gas Pipeline Inspection Certificate Holder or Professional Engineer and in accordance with the *CSA Z662 – Oil and Gas Pipeline Systems standard* and *Ontario Regulation 210/01, Oil and Gas Pipeline Systems*.

12. The method of construction will be a combination of open trench and trenchless technology. Restoration and monitoring will be conducted to ensure successful environmental mitigation for the Project.

13. Pipeline construction is divided into several crews that create a mobile assembly line. Each crew performs a different function, with a finished product left behind when the last crew has completed its work.
14. Contractors are required to erect safety barricades, fences, signs or flashers, or to use flag persons as may be appropriate, around any excavation across or along roads.
15. Construction of the pipeline generally includes the activities set out at Exhibit D, Tab 2, Schedule 1. Enbridge Gas proposes to install the proposed pipelines using open trench and trenchless methods (directional drilling or jack and bore).

#### **D. Project Timing**

16. Pending OEB approval, replacement of the Waubuno Gathering System is planned to commence in August 2026 and be placed into service by November 1, 2026. Construction of the proposed NPS 12 natural gas pipeline to replace the Waubuno Compressor Package is planned to commence in February 2027 and be placed into service by September 1, 2027. A proposed construction schedule is set out at Attachment 1 to this Exhibit.

#### **E. TSSA Correspondence**

17. Enbridge Gas filed an application with the TSSA on August 28, 2025, which can be found at Attachment 2 to this Exhibit. The TSSA reviewed Enbridge Gas's application and design of the proposed facilities and confirmed that they did not find any non-compliances with Ontario Regulation 210/01: Oil and Gas Pipeline Systems or CSA Z662:23. This correspondence, dated November 21, 2025, can be found at Attachment 3 to this Exhibit.

## PROJECT COSTS AND ECONOMICS

1. The purpose of this section of evidence is to provide an overview of the costs of the Project. This Exhibit of evidence is organized as follows:
  - A. Project Costs
  - B. Storage Cost Allocation
  - C. Project Economics

### A. Project Costs

2. The total estimated cost of the Project is \$22.4 million as shown in Table 1 below. Excluding indirect overheads, the total estimated direct capital cost of the Project is \$21.4 million.

Table 1: Estimated Project Costs

<u>Item #</u>	<u>Description</u>	<u>Pipeline Costs</u>	<u>Ancillary Costs<sup>1</sup></u>	<u>Total Costs</u>
1	Material Costs	\$2,338,000	\$1,092,000	\$3,430,000
2	Labour Costs	\$6,476,261	\$2,161,158	\$8,637,419
3	External Permitting & Lands	\$245,400	\$54,600	\$300,000
4	Outside Services	\$2,402,100	\$942,900	\$3,345,000
5	Contingency	\$2,865,441	\$1,062,665	\$3,928,106
<b>6</b>	<b>Direct Capital Cost</b>	<b>\$14,327,202</b>	<b>\$5,313,323</b>	<b>\$19,640,525</b>
7	Interest During Construction	\$246,295	\$114,939	\$361,234
8	Indirect Overheads	\$767,123	\$245,018	\$1,012,141
9	Dismantlement	\$882,875	\$517,125	\$1,400,000
<b>10</b>	<b>Total Project Costs<sup>2</sup></b>	<b>\$16,223,495</b>	<b>\$6,190,405</b>	<b>\$22,413,900</b>

<sup>1</sup> Ancillary facilities include the rebuild of the Waubuno Pool Station, new launcher and valve site, and new receiver site described in Exhibit D, Tab 1, Schedule 1.

<sup>2</sup> The Total Project Costs include the abandonment and removal of the existing compressor, gathering line and well laterals under Item #9 Dismantlement.

3. The cost estimate set out in Table 1 is a Class 4 estimate following the Company's Cost Estimating and Management Standard. The cost estimate includes a 25% contingency applied to all direct capital costs to reflect the current (preliminary) design stage of the Project. This contingency amount adheres to the Cost Estimating and Management Standard which outlines suggested contingency ranges for different estimate classes and has been calculated based on the risk profile of the Project. The suggested contingency range for Class 4 estimates is 15-40% and the selected contingency of 25% is below the midpoint of this range (27.5%).

#### Project Cost Comparison

4. The project costs of recent pipeline projects of comparable scopes are set out in Table 2. Importantly, no two facility projects are directly comparable. There are multiple unique factors and project characteristics that influence costs, including but not limited to:
  - **Complexity of Construction** – The unique location and condition of project construction (e.g., greenfield, geotechnical ground conditions, environmentally sensitive areas, dense urban areas, established agricultural lands, road allowance, watercourse crossings, etc.) affects the method and complexity of construction. Generally, the higher the construction complexity, the greater the duration and cost to construct.
  - **Timing of Construction** – Depending on the season during which construction occurs (i.e., summer conditions compared to winter conditions) costs can vary widely. Further, if project construction schedules are condensed for any reason (e.g., regulatory delay, inclement weather, labour constraints etc.) costs can escalate to achieve facility in-service dates that are required for operational and/or commercial purposes. If the project in-service date is delayed for any reason as noted above, costs can escalate due to inflation.

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- **System Planning Characteristics** – Differences in facility design and MOP results in differences in materials, as well as construction, welding, and testing requirements.
- **Contracting** – Depending on the contracting and payment structure, interest during construction is not applied to all projects in the same way.

Table 2: Project Cost Comparison

	<b>Waubuno Gathering System and Compressor Replacement Project</b>	<b>Sarnia Industrial Line Reinforcement Project<sup>3</sup></b>	<b>St. Laurent Pipeline Replacement Project<sup>4</sup></b>
<b>Facility Description</b>	<ul style="list-style-type: none"> <li>• 1.1 km NPS 12 9,308 kPa</li> <li>• 640 m NPS 12 9,308 kPa</li> <li>• 220 m NPS 8, 9,308 kPa</li> <li>• 87 m NPS 10, 9,308 kPa</li> <li>• Station Rebuild</li> <li>• New launcher/receiver site</li> </ul>	<ul style="list-style-type: none"> <li>• 1.2 km NPS 20, 6,620 kPa</li> <li>• New Valve Site</li> <li>• Station modifications Novacor Corunna and Dow Valve Site</li> </ul>	<ul style="list-style-type: none"> <li>• 10 km NPS 12, 4,500 kPa</li> <li>• 2.5 km NPS 16, 4,500 kPa</li> <li>• 0.3 km NPS 6, 4,500 kPa</li> <li>• 0.9 km NPS 6, 440 kPa</li> <li>• 3.9 km NPS 4, 440 kPa</li> </ul>
<b>Material Costs</b>	\$2,338,000	\$3,852,000	\$5,713,679
<b>Labour and Construction Costs</b>	\$9,123,761	\$15,928,000	\$119,644,388 <sup>5</sup>
<b>IDC</b>	\$361,234	\$141,000	\$3,711,276
<b>Contingency</b>	\$2,865,441	\$27,660	\$19,840,594
<b>Station Costs</b>	\$5,313,323	\$12,303,809	\$15,587,796
<b>Dismantlement</b>	\$1,400,000	\$0	\$8,700,000
<b>Indirect Overheads</b>	\$1,012,141	\$4,231,977	\$35,517,720
<b>Total Project Costs</b>	\$22,413,900	\$36,484,446 <sup>6</sup>	\$208,715,452 <sup>7</sup>
<b>Pipeline Cost per meter<sup>8</sup></b>	\$7,430 <sup>9</sup>	\$16,506	\$8,744

<sup>3</sup> EB-2019-0218.

<sup>4</sup> EB-2024-0200.

<sup>5</sup> Subtracted pipeline dismantlement costs to provide in a dedicated table row.

<sup>6</sup> Actual project costs as of April 30, 2023, from the Post Construction Financial Report filed in the EB-2019-0218 proceeding.

<sup>7</sup> This is the total cost less the Incremental Investigation Costs (EB-2024-0200, Exhibit E, Tab, 1, Schedule, p. 2, Table 1, Item #10).

<sup>8</sup> Excludes ancillary costs, indirect overheads, and interest during construction.

<sup>9</sup> Includes pipeline portion of dismantlement only.

## B. Storage Cost Allocation

5. As discussed in Exhibit B, Tab 3, Schedule 1, the capital costs for the Project will be apportioned between regulated and unregulated storage operations in accordance with the Company's storage allocation methodology.<sup>10</sup> Table 3 sets out the forecasted storage cost allocation for the Project. All costs associated with the portion of unregulated storage operations will be captured in the unregulated accounts. As a result, Enbridge Gas's ratepayers will not incur any rate impacts of the unregulated allocations. The Waubuno Gathering System Enhancements discussed in Exhibit B, Tab 1, Schedule 1, Section E are 100% unregulated as shown below in Table 3.

Table 3  
Project Storage Cost Allocation

Facility and Type	Storage Cost Allocation <sup>11</sup>	Forecasted Capital Cost <sup>12</sup>
Preferred Alternative	62.2% Regulated	\$12,722,439
Preferred Alternative	37.8% Unregulated	\$7,731,643
Enhancements	100% Unregulated	\$947,677
<b>Total Direct Project Cost</b>		<b>\$21,401,760</b>

## C. Project Economics

6. A Discounted Cash Flow (DCF) report has not been completed as the Project is driven by integrity concerns as discussed in Exhibit B, Tab 1, Schedule 1. A DCF report has not been completed for the Waubuno Gathering System Enhancements as this portion is being paid for by the non-utility business. The Project will replace an equivalent amount of Design Day storage space capacity and injection capability to that being lost, and no incremental storage space capacity or withdrawal capability will be created by the Project.

<sup>10</sup> Project costs will be allocated using Enbridge Gas's harmonized storage allocation methodology, as approved by the OEB in its November 29, 2024 Decision on the Settlement Proposal from the Rebasing Phase 2 proceeding (EB-2024-0111).

<sup>11</sup> Forecasted 2026 allocation percentages. Updated allocation percentages may be used as they become updated/available.

<sup>12</sup> Inclusive of direct capital costs only (excludes indirect overheads).

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## ENVIRONMENTAL MATTERS

1. The purpose of this section of evidence is to provide an overview of the Environmental Report (ER) completed for the Project and to provide specific details regarding archaeology and built heritage resources and cultural heritage landscapes.
  2. This Exhibit of evidence is organized as follows:
    - A. ER Overview
    - B. Archaeology
    - C. Built Heritage Resources and Cultural Heritage Landscapes
- A. ER Overview**
3. Enbridge Gas retained Stantec Consulting Limited (Stantec) to undertake a route evaluation and environmental and socio-economic impact study, which included a cumulative effects assessment, to select the Preferred Route (PR) for the Project. As part of the development of the study, Enbridge Gas and Stantec implemented a consultation program to receive input from interested and potentially affected parties, including Indigenous communities. The consultation program input was evaluated and integrated into the study. Mitigation measures designed to reduce environmental and community impacts resulting from construction of the Project were also developed as part of the study.
  4. The results of the study are documented in the Environmental Report (ER) entitled *Waubuno Gathering System & Compressor Replacement Project: Environmental*

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*Report*<sup>1</sup> included at Attachment 1 to this Exhibit. The ER conforms to the OEB's *Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Projects and Facilities in Ontario, 8<sup>th</sup> Edition, 2023* (OEB Guidelines).

5. Enbridge Gas agrees with Stantec's findings.
6. The objective of the ER is to outline various environmental mitigation and protection measures for the construction and operation of the Project while meeting the intent of the OEB Guidelines. To meet this objective the ER was prepared to:
  - Identify a PR for the Compressor Replacement Alternative 1 (as described in Exhibit C, Tab 1, Schedule 1) that reduces potential environmental impacts.
  - Complete a detailed review of environmental and socio-economic features along the Project components and assess the potential environmental impacts of the Project on these features.
  - Establish mitigation and protective measures that may be used to reduce or eliminate potential environmental and socio-economic impacts of the Project.
  - Develop an engagement and consultation program to receive input from interested and potentially affected parties; and
  - Identify any necessary supplemental studies, monitoring, and contingency plans.
7. Details of the environmental study process can be found in Section 1.2.2 of the ER, and details of the routing analysis can be found in Section 4 of the ER. Details of the engagement and consultation program can be found in Section 2 of the ER.

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<sup>1</sup> The ER was entitled *Waubuno Pipeline & Compressor Replacement Project: Environmental Report* during the ER's engagement and consultation program and therefore may be referenced as such in project correspondence.

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8. A Notice of Upcoming Project (NUP) was sent via email to all parties identified on the Elected Officials, Municipal, and Indigenous communities contact lists on January 31, 2025, and to all parties identified on the Federal Agencies, Provincial Agencies, Conservation Authorities, and Ontario Pipeline Coordinating Committee (OPCC) contact lists on February 7, 2025. The NUP was also mailed to landowners in the Study Area via Canada Post ad mail on February 7, 2025. Project contact lists can be found in Appendix A.2 of the ER, and a copy of the NUP can be found in Appendix A.4 of the ER. The NUP introduced the Project, provided a general map of the Study Area, and listed the designated Project contact information.
  
9. Notice of Study Commencement and Virtual Information Session letters for the Project were emailed to all identified Indigenous communities on March 26, 2025, and elected officials on April 1, 2025. The letters were sent to all other parties identified on the Project contact lists on April 4, 2025. Letters were also mailed out to landowners in the Study Area for the Project via Canada Post on April 4, 2025. The notices contained a project description and the timing for the virtual information session, and project website. Generic copies of the letters noted above can be found in Appendix A.4 of the ER.
  
10. To inform and solicit input from landowners, tenants, and the public with respect to the Project, a virtual information session was held from April 14, 2025, to April 28, 2025. The purpose of the information session was to provide the public with an opportunity to: (i) view specifics of the Project; and (ii) ask questions and comment on the Project, the ER, and the overall planning process. Notification of the information sessions was completed through newspapers, letters, and e-mails. An in-person information session was also held for Aamjiwnaang First Nation on June

- 10, 2025. Virtual and in-person information session materials can be found in Appendix A.5 of the ER.
11. During the consultation process for development of the ER, Enbridge Gas and Stantec received comments from the public, agencies, interest groups, municipal and elected officials and Indigenous groups. Consultation logs can be found in Appendix A.6 of the ER.
12. The draft ER was circulated to the OPCC, Indigenous communities and all other parties identified on the Project contact lists on July 28, 2025, with comments requested by September 8, 2025. Enbridge Gas commits to addressing comments received from all parties throughout the entirety of the Project. A summary of comments received and subsequent responses related to the draft ER are set out in Appendix A.6 of the ER.
13. Enbridge Gas will comply with all mitigation measures recommended in the ER, conditions from agency consultation and approvals, and mitigation objectives identified with Indigenous communities in relation to environmental matters associated with the proposed works. These mitigation measures will be communicated to the construction contractor prior to the commencement of Project construction and a qualified Environmental Advisor or suitable representative will be available to assist the Project Manager in seeing that mitigation measures as well as any additional permitting requirements and/or conditions of approval are adhered to and that commitments made to the public, landowners, Indigenous communities and agencies are honored. The Environmental Advisor and Project Manager will also mitigate any unforeseen environmental circumstances that arise before, during, and after construction.

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14. Recommended mitigation measures for potential effects have been developed in the ER to address environmental and socio-economic features found within the Project area. A summary of potential effects and recommended mitigation measures can be found in Section 5.2, Table 5.1 of the ER.

15. Using the mitigation measures and contingency plans found within the ER and additional mitigation measures provided by regulatory agencies and Indigenous communities via the permitting and approval process and consultation, the construction of this Project will have negligible impacts on the environment. The cumulative effects assessment completed as part of the ER determined that, provided the mitigation and protective measures outlined in the ER are implemented and that concurrent projects implement similar mitigation and protective measures, potential cumulative effects are not anticipated to occur, or if they do occur are not anticipated to be significant.

## **B. Archaeology**

16. Archaeological assessments (AA) are being completed by Stantec. A Stage 1 AA was completed and submitted to the Ministry of Citizenship and Multiculturalism (MCM) for review on June 13, 2025, and entered into the Ontario Public Register of Archaeological Reports on July 7, 2025. The Stage 1 AA determined that approximately 5% of the Study Area retains archaeological potential. The Stage 1 AA can be found at Appendix E of the ER.

17. A Stage 2 AA, and any subsequently required archaeological studies, will be completed for any area that retains archaeological potential during the 2025/2026 field seasons. Indigenous communities will be invited to participate in the

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assessments. Upon completion, the Stage 2 AA will be submitted to the MCM for review and acceptance into the Ontario Public Register of Archaeological Reports.

### **C. Built Heritage Resources and Cultural Heritage Landscapes**

18. A Cultural Heritage Screening Report (CHSR) was prepared for the Project and can be found at Appendix F of the ER. The CHSR was completed to identify protected and potential built heritage resources and cultural heritage landscapes and make recommendations for future work, as appropriate.
  
19. The CHSR found that there are multiple structures over 40 years of age within the Study Area which indicates potential cultural heritage value. A Cultural Heritage Report is being completed by Stantec to review potential impacts to the identified structures and provide recommended mitigation measures as necessary.

## LAND MATTERS

1. The purpose of this section of evidence is to provide an overview of land rights required for the Project, Enbridge Gas's existing forms of land rights and of temporary land use and the status of outreach and negotiations with affected landowners.
2. This Exhibit of evidence is organized as follows:
  - A. Land Rights for the Project
  - B. Proposed Easement Requirements
  - C. Landowner Relations
  - D. Authorizations and Permits Required

### **A. Land Rights for the Project**

3. The PR for the Project is summarized in Exhibit D, Tab 1, Schedule 1, and described in more detail in Section 4 of the ER, found at Attachment 1 to Exhibit F, Tab 1, Schedule 1. Maps showing the PR for the Project can be found at Attachment 1 to Exhibit A, Tab 2, Schedule 1, Exhibit C, Tab 1, Schedule 1, and Appendix C of the ER.
4. The proposed 1.1 km of NPS 12 natural gas pipeline 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 new NPS 12 natural gas pipeline. The proposed natural gas pipeline will be constructed through pre-existing rights granted through By-Law # 31 of 2010, "A By-Law to authorize a Franchise Agreement Between the Corporation of The Township of St. Clair and

Union Gas Limited” (effective March 14, 2011).

5. The proposed replacements of the Waubuno Gathering System in the Waubuno Storage Pool are located within the bounds of existing easement lands. The land rights to complete the pipeline replacement work were previously granted to Enbridge Gas through existing easement agreements and reference plans registered on the title of each property. Additionally, Enbridge Gas maintains a Gas Storage Lease on the title of each property granting Enbridge Gas the rights to complete the proposed scope of work. It is not anticipated that any new permanent easements will be required for the proposed Waubuno Gathering System replacements.
  
6. Enbridge Gas is seeking approximately 8.15 acres (3.31 hectares) of temporary land use (TLU) for construction and storage purposes as shown in Table 1 below. Enbridge Gas maintains a Gas Storage Lease on title of three out of the four private properties the Company is seeking TLU on. The Gas Storage Lease grants Enbridge Gas the right to complete this scope of work. The remaining property the Company is seeking TLU on will require a Temporary Land Use Agreement with the affected landowner to complete the scope of work. Preliminary discussions with this landowner have taken place, however an agreement has not been finalized. Please see Attachments 1 to 4 to this Exhibit for the locations of the proposed TLU areas.

Table 1: Proposed TLU for the Project

PIN	TLU	Existing Gas Storage Lease
43312-0087	2.76 acres (1.12 hectares)	Yes
43312-0101	4.44 acres (1.80 hectares)	Yes
43315-0053	0.74 acres (0.3 hectares)	Yes
43315-0130	0.21 acres (0.09 hectares)	No

## **B. Proposed Easement Requirements**

7. A list of the properties that will be directly affected by the Project and properties adjacent to directly affected lands required for the Project is outlined in Attachment 5 to this Exhibit. The names and addresses shown on this list have been redacted to safeguard landowner privacy where appropriate.
8. Attachment 6 to this Exhibit contains the standard form Easement Agreement that will be provided to landowners should it be determined that an easement is required. This form of agreement was approved by the OEB for use as part of the Company's Watford Pipeline Project (EB-2023-0175).<sup>1</sup>
9. Attachment 7 to this Exhibit contains the standard form Temporary Land Use Agreement that will be provided to landowner of the property the Company is seeking TLU on that does not have an existing Gas Storage Lease. This agreement typically applies for a period of two years, beginning in the year of construction, allowing Enbridge Gas to return in the year following construction to perform clean-up work as required. This form of agreement was approved by the OEB for use as part of the Company's Watford Pipeline Project (EB-2023-0175).<sup>2</sup>

## **C. Landowner Relations**

10. Enbridge Gas is implementing a comprehensive program to provide landowners and other interested parties with information regarding the Project. Information was previously distributed through correspondence and meetings with the public. Where formal public meetings were held, in conjunction with the ER process (as discussed in Exhibit F, Tab 1, Schedule 1), directly affected landowners and agencies were

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<sup>1</sup> EB-2023-0175, Exhibit G, Tab 1, Schedule 1, Attachment 3; and EB-2023-0175, Decision and Order, March 7, 2024, p. 16.

<sup>2</sup> EB-2023-0175, Exhibit G, Tab 1, Schedule 1, Attachment 2; and EB-2023-0175, Decision and Order, March 7, 2024, p. 16.

invited to participate by letter, and the general public was invited to participate through newspaper advertisements.

11. Attachment 5 to this Exhibit identifies directly and indirectly affected landowners. Indirectly affected landowners are those landowners with property adjacent to the PR where no land rights are required as part of the proposed Project. Directly impacted landowners are those landowners whose lands are directly impacted by the Project work. Enbridge Gas will provide notice of this Application to the directly impacted landowners listed in Attachment 5.
12. Enbridge Gas has initiated preliminary meetings with directly impacted landowners to inform them of the Project. Enbridge Gas is preparing to meet with all landowners to answer any questions that they may have, and to obtain early access to complete survey work and remaining environmental studies.
13. Negotiations are on-going with all directly impacted landowners to address landowner compensation amounts for damages, and occupation of the directly affected landowners' properties. At the time of this filing, Enbridge Gas maintains the land rights to complete the work on three out of four of the private landowners' properties. Negotiations with the remaining landowner are in progress to obtain a Temporary Land Use Agreement. Attachment 5 to this Exhibit provides a summary of negotiations to date.

#### **D. Authorizations and Permits Required**

14. Enbridge Gas's preliminary work on the Project has identified the potential need for authorizations/approvals from and/or compliance with the policies of the following ministries, agencies, municipalities and organizations:

##### Provincial

- Ontario Energy Board
- Ministry of the Environment, Conservation and Parks

- Ministry of Citizenship and Multiculturalism
- St. Clair Region Conservation Authority

Municipal

- St. Clair Township

Other

- Indigenous engagement
- Landowner agreements for easements, temporary working space, and/or storage sites
- Third-party utility crossing agreements including Hydro One

15. Other authorizations, notifications, permits and/or approvals may be required in addition to those identified above. Enbridge Gas will complete all required notifications and will obtain all required authorizations, approvals, permits and land rights prior to the commencement of Project construction.

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## INDIGENOUS<sup>1</sup> CONSULTATION

1. Enbridge Gas is committed to implementing processes that support meaningful engagement with potentially affected Indigenous groups (First Nations and Métis). Enbridge Gas works to build an understanding of project related interests, ensure regulatory requirements are met, mitigate or avoid project-related impacts on Indigenous interests including rights, and provide mutually beneficial opportunities where possible.
2. This Exhibit of evidence is organized as follows:
  - A. Communication with the Ministry of Energy and Mines
  - B. Indigenous Engagement Program Objectives
  - C. Overview of Indigenous Engagement Program Activities
  - D. Ongoing Indigenous Engagement Activities
- A. Communication with the Ministry of Energy and Mines**
3. Pursuant to the OEB's Guidelines, Enbridge Gas provided the Ontario Ministry of Energy and Electrification (ENERGY) with a description of the Project (Project Description) to determine if there are any duty to consult requirements and, if so, if ENERGY would delegate the procedural aspects of the duty to consult to Enbridge Gas. This correspondence, dated December 4, 2024, is set out at Attachment 1 to this Exhibit.
4. Enbridge Gas received a letter (Delegation Letter) from ENERGY dated December 31, 2024 indicating that ENERGY had delegated the procedural aspects of consultation to Enbridge Gas for the Project. The Delegation Letter identified five

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<sup>1</sup> Enbridge Gas has used the terms "Aboriginal" and "Indigenous" interchangeably in its application. "Indigenous" has the meaning assigned by the definition "aboriginal peoples of Canada" in subsection 35(2) of the *Constitution Act, 1982*.

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Indigenous communities to be consulted in relation to the Project. A copy of the Delegation Letter is provided at Attachment 2 to this Exhibit.

5. On November 14, 2025, Enbridge Gas provided a Project Update Letter to ENERGY that described an updated Project scope and confirmed that no additions were made to the Project scope outside of the original Project study area identified in the December 4, 2024 Project Description. The Project Update Letter is provided at Attachment 3 to this Exhibit.
6. This Indigenous Consultation Report (ICR) was provided to the Ministry of Energy and Mines (MEM)<sup>2</sup> on the date of this filing. MEM will review Enbridge Gas's consultation with Indigenous groups potentially affected by the Project and provide its letter of opinion as to whether Enbridge Gas's consultation has been sufficient. Upon receipt of MEM's letter regarding the sufficiency of Indigenous consultation on the Project, Enbridge Gas will file it with the OEB. The letter of opinion provided by MEM will be included as Attachment 4 to this Exhibit once received.

## **B. Indigenous Engagement Program Objectives**

7. The design of the Indigenous engagement program was based on adherence to the OEB's Guidelines and Enbridge Inc.'s company-wide Indigenous Peoples Policy (Policy) (set out in Attachment 5 to this Exhibit). The Policy lays out key principles for establishing relationships with Indigenous groups, which include:
  - Recognizing the importance of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) in the context of existing Canadian law.
  - Recognizing the legal and constitutional rights possessed by Indigenous Peoples in Canada and the importance of the relationship between

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<sup>2</sup> Effective March, 2025, the Ontario Ministry of Energy and Electrification is renamed the Ontario Ministry of Energy and Mines.

Indigenous Peoples and their traditional lands and resources.

8. Enbridge Gas strives to achieve meaningful relationships with Indigenous groups by providing timely exchanges of information, understanding and addressing Indigenous project-specific concerns, and ensuring ongoing dialogue regarding its projects, including potential impacts and benefits. Enbridge Gas aligns its interests with those of Indigenous communities through meaningful, direct Indigenous economic activity in projects corresponding to community capacity and project needs, where possible.
9. The Indigenous engagement program for the Project recognizes the rights of Indigenous groups and assists Enbridge Gas in engaging in meaningful dialogue with potentially affected Indigenous groups to address any Project-related concerns and interests. It also assists Enbridge Gas in meeting the procedural aspects of consultation that may be required by the Crown and the OEB's Guidelines.

### **C. Overview of Indigenous Engagement Program Activities**

10. Enbridge Gas conducts its Indigenous engagement generally through phone calls, in-person meetings, Project mail-outs, open houses and email communications. During these engagement activities, Enbridge Gas representatives will provide an overview of the Project, respond to questions and concerns, and address any interests or concerns expressed by Indigenous communities to appropriately mitigate any Project-related impacts. In order to accurately document Indigenous engagement activities and ensure follow-up, applicable supporting documents are tracked using a database. In addition, capacity funding is offered to assist Indigenous communities to meaningfully participate in engagement activities.

**D. Ongoing Indigenous Engagement Activities**

11. Enbridge Gas will continue to actively engage all identified Indigenous groups in meaningful ongoing dialogue concerning the Project and endeavor to meet with each Indigenous group, provided they are willing, for the purpose of exchanging information regarding the Project and to respond to inquiries in a timely manner. Enbridge Gas will hear and address concerns as is feasible and seek information on the exercise of, and potential impacts to, Aboriginal or treaty rights, traditional use in the Project area and how any potential Project-related impacts can be mitigated. Enbridge Gas also engages as appropriate with MEM to ensure they are kept apprised of rights assertions by communities.
12. Attachment 6 to this Exhibit contains a summary of Enbridge Gas's Indigenous engagement activities for the Project. Attachment 7 to this Exhibit contains the ICR and associated attachments for the Project.
13. The information presented in the Attachment 6 and Attachment 7 reflects Enbridge Gas's Indigenous engagement activities for the Project up to and including November 5, 2025; however, Enbridge Gas will continue to engage throughout the life of the Project to ensure any impacts on Aboriginal or treaty rights are addressed, as appropriate.

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### CONDITIONS OF APPROVAL

1. The OEB has developed standard conditions that are typically imposed in leave to construct approvals.<sup>1</sup> Enbridge Gas has reviewed these standard conditions and has not identified any additional or revised conditions that the Company wishes to propose for this Project.

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<sup>1</sup> Standard conditions of approval are included in Schedule 1 of the OEB's standard issues list for leave to construct applications: [https://www.oeb.ca/sites/default/files/issues-list-LTC-natural-gas\\_2024.pdf](https://www.oeb.ca/sites/default/files/issues-list-LTC-natural-gas_2024.pdf)

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
I	[REDACTED] and [REDACTED]	[REDACTED]	1. St. Clair Region Conservation Authority.  2. Mainstreet Credit Union Limited	1. 205 Millpond Cr Strathroy, ON N7G 3P9  2. 2394 Jane St., Brigden, ON N0N 1B0	1. (a) Easement 1. (b) Agreement  2. Mortgage	43312-0081	Northeast 1/4 of Lot 11, Concession 2, Moore, exc. Part 4, 25R4863; St. Clair	N/A
I	[REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. St. Clair Region Conservation Authority.  3. His Majesty the King in right of Canada as represented by the Minister of National Revenue	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2. 205 Millpond Cres Strathroy, ON N7G 3P9  3. Canada Revenue Agency, 5001 Yonge Street, North York, ON M2N 6R9	1. (a) Lease 1. (b) Agreement 1. (c) Easement-Right-of-way  2. (a) Easement 2. (b) Agreement  3. Lien	43312-0086	Part of Lot 10, Concession 2, Moore, as in L521684 exc. SRO Part 3, 25R289; St. Clair	N/A

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
D	[REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. St. Clair Region Conservation Authority.  3. Farm Credit Canada	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2. 205 Millpond Cres Strathroy, ON N7G 3P9  3. Suite 200 1133 St. George Blvd Moncton, NB E1E 4E1	1. (a) Lease 1. (b) Agreement 1. (c) Easement- Right-of-way  2. (a) Easement 2. (b) Agreement  3. Mortgage	43312-0087	Part of Road Allowance between Lots 9 & 10, Concession 2, Moore, and Part of Lot 9, Concession 2, Moore, as in L324193 exc. Parts 1, 4, 5, 6 & 7, 25R2187; St. Clair	<p>Landowner expressed concerns about temporary road closure; Enbridge Gas will provide a traffic control plan.</p> <p>Enbridge Gas contacted the landowner regarding temporary workspace for the new NPS 12 natural gas pipeline and the landowner raised concerns regarding municipal and private field tile drainage and objected to stockpiling soils from the municipal ROW on his property; Enbridge Gas will continue to work with the landowner to alleviate concerns related to tile drainage and soil stockpiling and will provide information related to Enbridge Gas's plans to maintain drainage during construction, and options for soil stockpiling.</p> <p>Landowner agreed to work with Enbridge Gas to use temporary workspace on his property for the Gathering System replacement scope of work.</p>

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
I	The Corporation of the Township of St. Clair	1155 Emily Street, Mooretown, ON N0N 1M0	1. Enbridge Gas Inc. (Union Gas Limited)	1.3501 Tecumseh Rd Mooretown ON N0N 1M0	1. (a) Easement 1. (b) Agreement 1. (c) Lease	43312-0095	Part of Lot 10, Concession 2, Moore, Part 3, 25R289 SRO; St. Clair	N/A
D	[REDACTED] and [REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. St. Clair Region Conservation Authority.  3. Mainstreet Credit Union Limited	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2. 205 Millpond Cres Strathroy, ON N7G 3P9  3. 4348 St. Clair Pky Port Lambton, ON NOP 2B0	1. (a) Lease 1. (b) Agreement 1. (c) Easement-Right-of-way  2. (a) Easement 2. (b) Agreement  3. Mortgage	43312-0101	South 1/2 of Lot 11, Concession 2, Moore, lying N & E of Bear Creek and Part of Lot 10, Concession 2, Moore, as in L684869, save & except Part 5, 25R4863; St. Clair	Landowner agreed to work with Enbridge Gas to use temporary workspace on his property.  Landowner agreed to permanent occupation areas for new ILL Launching Facility on his property.

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
D	The Corporation of the Township of St. Clair	1155 Emily Street, Mooretown, ON N0N 1M0	1. Enbridge Gas Inc. (Union Gas Limited)  2. Enbridge Gas Inc. (Tecumseh Gas Storage Ltd.)	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2.3501 Tecumseh Rd Mooretown ON N0N 1M0	1. (a) Lease 1. (b) Agreement 1. (c) OEB Order  2. (a) Easement-Right-of-way 2. (b) Agreement	43313-0052	Part of the Road Allowance between Concessions 2 & 3, Moore, and Part of Lots 10-12, Concession 2, Moore, Parts 1-5, 25R4863; known as Oil Springs Line between Brigden Line and Waubuno Rd.; St. Clair	N/A – Enbridge Gas has a Franchise Agreement (EB-2010-0382, effective until March 14, 2031) and a Certificate of Public Convenience and Necessity (EB-2010-0384, issued on February 15, 2011) that cover all areas within the Township of St. Clair within which the Project will be constructed.
I	[REDACTED]	[REDACTED]	1. Colonial Petroleums Limited	Cranbrook Road, London, ON N6K 3H7	1. Lease	43313-0054 (part)	Part of Lot 7, Concession 3, Moore, as in L581511; St. Clair	N/A
I	[REDACTED]	[REDACTED]	1. Colonial Petroleums Limited	Cranbrook Road, London, ON N6K 3H7	1. Lease	43313-0054 (part)	Part of Lot 7, Concession 3, Moore, as in L581511; St. Clair	N/A

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
I	[REDACTED]	[REDACTED]	1. Colonial Petroleums Limited	Cranbrook Road, London, ON N6K 3H7	1. Lease	43313-0055 (part)	Part of Lot 7, Concession 3, Moore, as in L318578; St. Clair	N/A
I	[REDACTED]	[REDACTED]	1. Colonial Petroleums Limited	Cranbrook Road, London, ON N6K 3H7	1. Lease	43313-0055 (part)	Part of Lot 7, Concession 3, Moore, as in L318578; St. Clair	N/A
I	[REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. Enbridge Gas Inc. (Tecumseh Gas Storage Ltd.) (Consumers Gas Company Ltd.)  3. Enbridge Gas Inc.  4. The Bank of Nova Scotia	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2.3501 Tecumseh Rd Mooretown ON N0N 1M0  3.3501 Tecumseh Rd Mooretown ON N0N 1M0  4. 1584 Main Street Brigden, ON N0N 1B0	1. (a) Lease 1. (b) Easement-Right-of-way  2. Easement-Right-of-way  3. Easement  4. Mortgage	43313-0056	Southeast 1/4 of Lot 8, Concession 3, Moore; St. Clair	N/A

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
I	[REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. Enbridge Gas Inc. (Tecumseh Gas Storage Ltd.) (Consumers Gas Company Ltd.)  3. Enbridge Gas Inc.  4. Royal Bank of Canada	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2.3501 Tecumseh Rd Mooretown ON N0N 1M0  3.3501 Tecumseh Rd Mooretown ON N0N 1M0  4. 10 York Mills Rd, 3rd Floor, Toronto, ON M2P 0A2	1. (a) Lease 1. (b) Easement- Right-of-way 1. (c) OEB Order 1. (d) Agreement  2. Easement-Right- of-way  3. Easement  4. Mortgage	43313-0059	Southwest 1/4 of Lot 8, Concession 3, Moore; St. Clair	N/A

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
I	[REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. Enbridge Gas Inc. (Tecumseh Gas Storage Ltd.) (Consumers Gas Company Ltd.)  3. Enbridge Gas Inc.	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2.3501 Tecumseh Rd Mooretown ON N0N 1M0.  3.3501 Tecumseh Rd Mooretown ON N0N 1M0	1. (a) Lease 1. (b) Agreement  2. Easement Right-of-way  3. Easement	43313-0060	Southeast 1/4 of Lot 9, Concession 3, Moore exc. SRO Part 12, 25R2187; St. Clair	N/A
I	The Corporation of the Township of St. Clair	1155 Emily Street, Mooretown, ON N0N 1M0	1. Enbridge Gas Inc. (Union Gas Limited)  2. Enbridge Gas Inc. (Tecumseh Gas Storage Ltd.) (Consumers Gas Company Ltd.)  3. Enbridge Gas Inc. (Consumers' Gas)	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2.3501 Tecumseh Rd Mooretown ON N0N 1M0  3.3501 Tecumseh Rd Mooretown ON N0N 1M0	1. (a) Lease 1. (b) Agreement 1. (c) Easement 1. (d) OEB Order  2. (a) Easement-Right-of-way 2. (b) Agreement  3. (a) Easement-Right-of-way 3. (b) Agreement	43313-0061	Part of Lot 9, Concession 3, Moore, as in MO7405, L177071 & SRO Parts 8-12, 25R2187; Part of Lot 9, Concession 4, Moore, as in L177008 and Part of the Road Allowance between Lots 9 & 10, Concession 4; Telfer Road; St. Clair	N/A

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
I	<p>[REDACTED]</p> <p>and</p> <p>[REDACTED]</p>	[REDACTED]	<p>1. Enbridge Gas Inc. (Union Gas Limited)</p> <p>2. Mainstreet Credit Union Limited</p> <p>3. St. Clair Region Conservation Authority</p>	<p>1.3501 Tecumseh Rd Mooretown ON N0N 1M0</p> <p>2. 40 Keil Street S., Chatham, ON N7M 3G8</p> <p>3. 205 Millpond Cres Strathroy, ON N7G 3P9</p>	<p>1. (a) Lease 1. (b) Agreement 1. (c) Easement- Right-of-way</p> <p>2. Mortgage</p> <p>3. (a) Easement 3. (b) Agreement</p>	43313-0062	<p>Part of Lots 9 &amp; 10, Concession 3, Moore, and Part of the Road Allowance between Lots 9 &amp; 10, Concession 3, Moore, Closed, as in L596576 except SRO Part 8, 25R2187; St. Clair</p>	N/A

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
I	[REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. Enbridge Gas Inc. (Tecumseh Gas Storage Ltd.) (Consumers Gas Company Ltd.)  3. Enbridge Gas Inc. (Consumers' Gas)  4. Mainstreet Credit Union Limited  5. St. Clair Region Conservation Authority  6. [REDACTED]	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2.3501 Tecumseh Rd Mooretown ON N0N 1M0  3.3501 Tecumseh Rd Mooretown ON N0N 1M0  4. 1295 London Rd Sarnia, ON N7S 1P6  5. 205 Millpond Cres Strathroy, ON N7G 3P9  6. [REDACTED]	1. (a) Lease 2. (b) Agreement  2. Easement  3. Easement  4. Mortgage  5. (a) Easement 5. (b) Agreement  6. Life interest in Mineral Rights	43313-0067	Lot 10, Concession 3, Moore, lying West of Bear Creek exc. Part 1, 25R1737; St. Clair	N/A

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
D	The Corporation of the Township of St. Clair	1155 Emily Street, Mooretown, ON N0N 1M0	1. Enbridge Gas Inc. (Union Gas Limited)	1.3501 Tecumseh Rd Mooretown ON N0N 1M0	1. (a) Lease 1. (b) Agreement 1. (c) Easement-Right-of-way	43315-0051	Part of Lot 9, Concession 2, Moore, Lying between the Road Allowance between Concessions 2 & 3 & East of Part 1, 25R2187, as in MO3157; SRO Parts 4-7, 13 & 14, 25R2187; AKA Telfer Rd; St. Clair	N/A – Enbridge Gas has a Franchise Agreement (EB-2010-0382, effective until March 14, 2031) and a Certificate of Public Convenience and Necessity (EB-2010-0384, issued on February 15, 2011) that cover all areas within the Township of St. Clair within which the Project will be constructed.
D	Enbridge Gas Inc. (Union Gas Limited)	3501 Tecumseh Rd Mooretown ON N0N 1M0				43315-0054	Part of Lot 9, Concession 2, Moore, being Part 1, 25R4707; St. Clair	N/A
I	[REDACTED] and [REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. The Bank of Nova Scotia	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2. 10 Wright Blvd., Stratford, ON N4Z 1H3	1. Easement  2. Mortgage	43315-0058 (part)	Part of Lot 7, Concession 2, Moore, as in L412919; St. Clair	N/A

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
I	[REDACTED] and [REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. The Bank of Nova Scotia	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2. 10 Wright Blvd., Stratford, ON N4Z 1H3	1. Easement  2. Mortgage	43315-0058 (part)	Part of Lot 7, Concession 2, Moore, as in L412919; St. Clair	N/A
I	[REDACTED] and [REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. Enbridge Gas Inc. (Tecumseh Gas Storage Ltd.) (Consumers' Gas Company Ltd.)  3. Enbridge Gas Inc.  4. The Bank of Nova Scotia  5. 2035881 Ontario Inc.	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2.3501 Tecumseh Rd Mooretown ON N0N 1M0  3.3501 Tecumseh Rd Mooretown ON N0N 1M0  4. 1584 Main Street Brigden, ON N0N 1B0  5. 2 Lansing Square, 11th Floor, Toronto, ON M2J 4P8	1. (a) Lease 1. (b) Easement-Right-of-way  2. Easement-Right-of-way  3. Easement  4. Mortgage  5. Notice	43315-0059	Part of Lot 7, Concession 2, Moore, as in L577991; St. Clair	N/A

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
I	<p>[REDACTED]</p> <p>and</p> <p>[REDACTED]</p>	[REDACTED]	<p>1. Enbridge Gas Inc. (Union Gas Limited)</p> <p>2. Enbridge Gas Inc. (Tecumseh Gas Storage Ltd.) (Consumers Gas Company Ltd.)</p> <p>3. Enbridge Gas Inc.</p> <p>4. Farm Credit Canada</p>	<p>1.3501 Tecumseh Rd Mooretown ON N0N 1M0</p> <p>2.3501 Tecumseh Rd Mooretown ON N0N 1M0</p> <p>3.3501 Tecumseh Rd Mooretown ON N0N 1M0</p> <p>4. Suite 200 1133 St. George Blvd Moncton, NB E1E 4E1</p>	<p>1. Easement-Right-of-way</p> <p>2. Easement-Right-of-way</p> <p>3. Easement</p> <p>4. Mortgage</p>	43315-0061	North 1/2 of South 1/2 of Lot 7, Concession 2, Moore; St. Clair	N/A
I	<p>[REDACTED]</p> <p>and</p> <p>[REDACTED]</p>	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)	1.3501 Tecumseh Rd Mooretown ON N0N 1M0	1. Agreement	43315-0112	Part of Lot 9, Concession 2, Moore, MRO Part 13, 25R2187; St. Clair	N/A

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
I	[REDACTED]	[REDACTED]	1. Farm Credit Canada	1. Suite 200 1133 St. George Blvd Moncton, NB E1E 4E1	1. Mortgage	43315-0113	Part of Lot 9, Concession 2, Moore MRO Parts 4-7, 25R2187; St. Clair	N/A
D	Enbridge Gas Inc.	3501 Tecumseh Rd Mooretown ON N0N 1M0	1. Enbridge Gas Inc. (Union Gas Limited)  2. Enbridge Gas Inc. (Tecumseh Gas Storage Ltd.) (Consumers Gas Company Ltd.)	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2.3501 Tecumseh Rd Mooretown ON N0N 1M0	1. (a) Agreement 1. (b) Easement-Right-of-way 1. (c) OEB Order  2. Easement-Right-of-way	43315-0129	Part of Lot 8, Concession 2, Moore, being Parts 1, 2 & 3, 25R11364; St. Clair	N/A

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
D	[REDACTED] and [REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. Enbridge Gas Inc. (Tecumseh Gas Storage Ltd.) (Consumers Gas Company Ltd.)	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2.3501 Tecumseh Rd Mooretown ON N0N 1M0	1. (a) Agreement 1. (b) Easement-Right-of-way 1. (c) OEB Order  2. Easement-Right-of-way	43315-0130	Part of the East 1/2 of Lot 8, Concession 2, Moore, save & except Parts 1, 2 & 3, 25R11364; St. Clair	Enbridge Gas contacted the landowner seeking a Temporary Land Use Agreement. Enbridge Gas to provide form of Temporary Land Use Agreement and Offer of Compensation for the landowners' consideration.
D	[REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. Enbridge Gas Inc. (Tecumseh Gas Storage Ltd.) (Consumers Gas Company Ltd.)	1.3501 Tecumseh Rd Mooretown ON N0N 1M0  2.3501 Tecumseh Rd Mooretown ON N0N 1M0	1. (a) Agreement 1. (b) Easement-Right-of-way 1. (c) OEB Order  2. Easement-Right-of-way	43315-0130 (Life Interest only)	Part of the East 1/2 of Lot 8, Concession 2, Moore, save & except Parts 1, 2 & 3, 25R11364; St. Clair	N/A – Life Interest Only (see summary of negotiations above).

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
I	[REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. Mainstreet Credit Union Limited	1. 3501 Tecumseh Rd Mooretown ON NON 1M0  2. 2394 Jane Street, Brigden, ON NON 1B0	1. (a) Lease 1. (b) Agreement 1. (c) Easement-Right-of-way 1. (d) OEB Order  2. Mortgage	43315-0131 (Part)	SRO Part of Lot 9, Concession 2, Moore, Part 1, 25R11388; St. Clair	N/A
I	[REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. Mainstreet Credit Union Limited	1. 3501 Tecumseh Rd Mooretown ON NON 1M0  2. 2394 Jane Street, Brigden, ON NON 1B0	1. (a) Lease 1. (b) Agreement 1. (c) Easement-Right-of-way 1. (d) OEB Order  2. Mortgage	43315-0131 (Part)	SRO Part of Lot 9, Concession 2, Moore, Part 1, 25R11388; St. Clair	N/A

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
I	[REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)	1.3501 Tecumseh Rd Mooretown ON N0N 1M0	1. (a) Lease 1. (b) Agreement 1. (c) Easement-Right-of-way 1. (d) OEB Order	43315-0133	West 1/2 Lot 8, Concession 2, Moore, and Part of Lot 9, Concession 2, Moore, as in L645847 & L388824 exc. SRO in L433441 exc. Part 1, 25R11388 SRO; St. Clair	N/A
D	Enbridge Gas Inc. (Union Gas Limited)	3501 Tecumseh Rd Mooretown ON N0N 1M0	1. Enbridge Gas Inc. (Union Gas Limited)	1.3501 Tecumseh Rd Mooretown ON N0N 1M0	1. (a) Lease 1. (b) Agreement 1. (c) Easement-Right-of-way	43315-0134	Part of Lot 9, Concession 2, Moore, being Part 1, 25R6835; St. Clair	N/A

Indirectly Affected (I) Directly Affected (D)	OWNER:	ADDRESS:	ENCUMBRANCE HOLDER:	ADDRESS:	ENCUMBRANCE:	PIN #	LEGAL DESCRIPTION:	Summary of Negotiations:
D	[REDACTED]	[REDACTED]	1. Enbridge Gas Inc. (Union Gas Limited)  2. Royal Bank of Canada	1. 3501 Tecumseh Rd Mooretown ON N0N 1M0  2. 10 York Mills Rd., 3rd Floor, Toronto, ON M2P 0A2	1. (a) Lease 1. (b) Agreement 1. (c) Easement-Right-of-way  2. Mortgage	43315-0135	Part of Lot 9, Concession 2, Moore as in L855379 exc. Part 1, 25R6835; St. Clair	<p>Enbridge Gas contacted the landowner regarding temporary workspace for the Project and the landowner raised concerns regarding the distance of the proposed NPS 12 natural gas pipeline to their residence and prefers the alternative pipeline route as it provides greater setback from residential areas.</p> <p>Enbridge Gas provided the landowner with information related to the design, testing, and monitoring of the pipeline to ensure its safe operation.</p> <p>Enbridge Gas informed the landowner that pipeline routes are chosen that minimize environmental and socio-economic impacts, use existing utility corridors when possible, and limit disruption to landowners.</p> <p>Enbridge Gas is continuing to communicate with the landowner to alleviate their concerns related to the proposed pipeline.</p>



Tracking



Get Notified

## Tracking Results

Found below waybills:

- [LSHP45971236](#)
- [LSHP45971750](#)
- [LSHP45971674](#)
- [LSHP45971628](#)
- [LSHP45971596](#)
- [LSHP45971575](#)
- [LSHP45971265](#)
- [LSHP45971194](#)
- [LSHP45971152](#)
- [LSHP45971119](#)

SHIPMENT # : LSHP45971236

PIECE # : LSHP45971236

POD

DELIVERED

**DATE/TIME**  
**STATUS**  
**CITY**

2026-01-12 11:09:35

Our Package was Delivered

MARKHAM

2026-01-12 07:41:27

Out for Delivery-Almost There!

MARKHAM

2026-01-09 23:59:45

Package Has Arrived at Our Facility

ETOBICOKE

2026-01-09 23:57:00

Package Has Arrived at Our Facility

ETOBICOKE

2026-01-09 23:48:47

Package Has Arrived at Our Facility

ETOBICOKE

2026-01-09 20:59:11

Package Has Arrived at Our Facility



ETOBICOKE

2026-01-09 16:05:50  
Package Has Arrived at Our Facility  
LONDON

2026-01-09 11:06:51  
Picked Up and On the Move!  
LONDON

2026-01-07 11:35:40  
Can't Find the Address-Checking Again! No Such Address  
LONDON

2026-01-07 09:30:21  
Out for Delivery-Almost There!  
LONDON

2026-01-07 07:04:57  
Package Has Arrived at Our Facility  
LONDON

2026-01-06 21:06:42  
Package Has Arrived at Our Facility  
ETOBICOKE

2026-01-06 19:53:13  
Package Has Arrived at Our Facility  
ETOBICOKE

2026-01-06 18:10:01  
Package Has Arrived at Our Facility  
MARKHAM

2026-01-06 15:51:26  
Picked Up and On the Move!  
MARKHAM



2026-01-06 00:00:00  
Shipment Record Received  
NORTH YORK

[Top](#)

SHIPMENT # : LSHP45971750

PIECE # : LSHP45971750

POD

DELIVERED

**DATE/TIME**  
**STATUS**  
**CITY**

2026-01-07 11:43:08  
Your Package was Delivered with no Signa Front Porch  
LONDON

2026-01-07 09:30:21  
Out for Delivery-Almost There!  
LONDON

---

2026-01-07 07:04:57  
Package Has Arrived at Our Facility  
LONDON

---

2026-01-06 21:06:42  
Package Has Arrived at Our Facility  
ETOBICOKE

---

2026-01-06 19:53:10  
Package Has Arrived at Our Facility  
ETOBICOKE

---

2026-01-06 18:10:01  
Package Has Arrived at Our Facility  
MARKHAM

---

2026-01-06 15:51:26  
Picked Up and On the Move!  
MARKHAM

---

2026-01-06 00:00:00  
Shipment Record Received  
NORTH YORK

---



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SHIPMENT # : LSHP45971674

PIECE # : LSHP45971674

**POD**

DELIVERED

**DATE/TIME**  
**STATUS**  
**CITY**

---

2026-01-07 14:02:21  
Our Package was Delivered  
LONDON

---

2026-01-07 07:37:23  
Out for Delivery-Almost There!  
LONDON

---

2026-01-07 07:04:57  
Package Has Arrived at Our Facility  
LONDON

---

2026-01-06 21:06:42  
Package Has Arrived at Our Facility  
ETOBICOKE

---

2026-01-06 19:53:24  
Package Has Arrived at Our Facility

ETOBICOKE

2026-01-06 18:10:01  
Package Has Arrived at Our Facility  
MARKHAM

2026-01-06 15:51:26  
Picked Up and On the Move!  
MARKHAM

2026-01-06 00:00:00  
Shipment Record Received  
NORTH YORK



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SHIPMENT # : LSHP45971628  
PIECE # : LSHP45971628

POD

DELIVERED

**DATE/TIME**  
**STATUS**  
**CITY**

2026-01-07 08:25:56  
Our Package was Delivered  
MONCTON

2026-01-07 07:04:58  
Out for Delivery-Almost There!  
MONCTON

2026-01-06 22:10:00  
Handed Off to a Local Delivery Partner  
ETOBICOKE

2026-01-06 21:06:42  
Package Has Arrived at Our Facility  
ETOBICOKE

2026-01-06 18:10:01  
Package Has Arrived at Our Facility  
MARKHAM

2026-01-06 15:51:26  
Picked Up and On the Move!  
MARKHAM

2026-01-06 00:00:00  
Shipment Record Received  
NORTH YORK



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SHIPMENT # : LSHP45971596

PIECE # : LSHP45971596

POD

DELIVERED

**DATE/TIME**  
**STATUS**  
**CITY**

---

2026-01-07 11:50:39  
Your Package was Delivered with no Signa Front Porch  
LONDON

---

2026-01-07 09:30:21  
Out for Delivery-Almost There!  
LONDON

---

2026-01-07 07:04:57  
Package Has Arrived at Our Facility  
LONDON

---

2026-01-06 21:06:42  
Package Has Arrived at Our Facility  
ETOBICOKE

---

2026-01-06 19:53:21  
Package Has Arrived at Our Facility  
ETOBICOKE

---

2026-01-06 18:10:01  
Package Has Arrived at Our Facility  
MARKHAM

---

2026-01-06 15:51:26  
Picked Up and On the Move!  
MARKHAM



---

2026-01-06 00:00:00  
Shipment Record Received  
NORTH YORK

---

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SHIPMENT # : LSHP45971575

PIECE # : LSHP45971575

POD

DELIVERED

**DATE/TIME**  
**STATUS**  
**CITY**

---

2026-01-14 13:18:27  
Our Package was Delivered

LONDON

---

2026-01-14 08:21:46  
Out for Delivery-Almost There!  
LONDON

---

2026-01-13 09:21:40  
Delayed at Facility Awaiting Scheduled Delivery  
LONDON

---

2026-01-13 08:50:15  
Delayed at Facility Awaiting Scheduled Delivery  
LONDON

---

2026-01-12 08:35:02  
Out for Delivery-Almost There!  
LONDON

---

2026-01-09 09:38:29  
Delayed at Facility Awaiting Scheduled Delivery  
LONDON

---

2026-01-08 15:00:56  
Business Closed Upon Arrival 1st Attempt  
LONDON

---

2026-01-08 08:18:38  
Out for Delivery-Almost There!  
LONDON

---

2026-01-07 07:04:57  
Package Has Arrived at Our Facility  
LONDON

---

2026-01-06 21:06:42  
Package Has Arrived at Our Facility  
ETOBICOKE

---

2026-01-06 19:53:17  
Package Has Arrived at Our Facility  
ETOBICOKE

---

2026-01-06 18:10:01  
Package Has Arrived at Our Facility  
MARKHAM

---

2026-01-06 15:51:26  
Picked Up and On the Move!  
MARKHAM

---



2026-01-06 00:00:00  
Shipment Record Received  
NORTH YORK

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SHIPMENT # : LSHP45971265

PIECE # : LSHP45971265

POD

**DATE/TIME**  
**STATUS**  
**CITY**

---

2026-01-07 13:25:19  
 Our Package was Delivered  
 LONDON

---

2026-01-07 09:30:21  
 Out for Delivery-Almost There!  
 LONDON

---

2026-01-07 07:04:57  
 Package Has Arrived at Our Facility  
 LONDON

---

2026-01-06 21:06:42  
 Package Has Arrived at Our Facility  
 ETOBICOKE

---

2026-01-06 19:53:06  
 Package Has Arrived at Our Facility  
 ETOBICOKE

---

2026-01-06 18:10:01  
 Package Has Arrived at Our Facility  
 MARKHAM

---

2026-01-06 15:51:26  
 Picked Up and On the Move!  
 MARKHAM

---

2026-01-06 00:00:00  
 Shipment Record Received  
 NORTH YORK

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SHIPMENT # : LSHP45971194

PIECE # : LSHP45971194

**POD**

**DATE/TIME**  
**STATUS**  
**CITY**

---

2026-01-07 11:48:05  
 Our Package was Delivered  
 LONDON

---

2026-01-07 09:30:21  
 Out for Delivery-Almost There!  
 LONDON

---

2026-01-07 07:04:57  
Package Has Arrived at Our Facility  
LONDON

---

2026-01-06 21:06:42  
Package Has Arrived at Our Facility  
ETOBICOKE

---

2026-01-06 19:52:54  
Package Has Arrived at Our Facility  
ETOBICOKE

---

2026-01-06 18:10:01  
Package Has Arrived at Our Facility  
MARKHAM

---

2026-01-06 15:51:26  
Picked Up and On the Move!  
MARKHAM

---

2026-01-06 00:00:00  
Shipment Record Received  
NORTH YORK

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SHIPMENT # : LSHP45971152  
PIECE # : LSHP45971152

POD

DELIVERED

**DATE/TIME**  
**STATUS**  
**CITY**

---

2026-01-07 11:45:31  
Your Package was Delivered with no Signa Front Porch  
LONDON

---

2026-01-07 09:30:21  
Out for Delivery-Almost There!  
LONDON

---

2026-01-07 07:04:57  
Package Has Arrived at Our Facility  
LONDON

---

2026-01-06 21:06:42  
Package Has Arrived at Our Facility  
ETOBICOKE

---

2026-01-06 19:53:29  
Package Has Arrived at Our Facility  
ETOBICOKE

---

2026-01-06 18:10:01  
Package Has Arrived at Our Facility

MARKHAM

2026-01-06 15:51:26  
Picked Up and On the Move!  
MARKHAM

2026-01-06 00:00:00  
Shipment Record Received  
NORTH YORK



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SHIPMENT #: LSHP45971119

PIECE #: LSHP45971119

POD

DELIVERED

**DATE/TIME**  
**STATUS**  
**CITY**

2026-01-07 13:43:10  
Our Package was Delivered  
MARKHAM

2026-01-07 09:41:58  
Out for Delivery-Almost There!  
MARKHAM

2026-01-06 21:59:50  
Package Has Arrived at Our Facility  
ETOBICOKE

2026-01-06 21:46:57  
Package Has Arrived at Our Facility  
ETOBICOKE

2026-01-06 21:43:15  
Package Has Arrived at Our Facility  
ETOBICOKE

2026-01-06 21:06:42  
Package Has Arrived at Our Facility  
ETOBICOKE

2026-01-06 18:10:01  
Package Has Arrived at Our Facility  
MARKHAM

2026-01-06 15:51:26  
Picked Up and On the Move!  
MARKHAM



2026-01-06 00:00:00  
Shipment Record Received  
NORTH YORK

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<a href="#">Terms of Use</a>	<a href="#">Site Map</a>



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## EB-2025-0307 - Waubuno Gathering System and Compressor Replacement Expansion Project - Notice of Application

---

**From** Preet Gill <preet.gill@enbridge.com>

**Date** Wed 1/7/2026 12:05 PM

**To** cmcclemens@stclairtownship.ca <cmcclemens@stclairtownship.ca>

2 attachments (2 MB)

Application & Evidence.pdf; Notice of Application.pdf;

Good Afternoon,

On November 24, 2025, Enbridge Gas filed an application with the OEB for an order granting leave to construct for the following:

- Approximately 1.1 km of Nominal Pipe Size (NPS) 12 steel natural gas pipeline from the Waubuno Pool Station to Enbridge Gas's existing NPS 36 Dawn to Corunna pipeline to replace the Waubuno Compressor Package.
- Approximately 640 m of NPS 12 natural gas pipeline to replace existing NPS 6, 8, and 10 sections of the Waubuno Gathering Line and approximately 280 m of NPS 8 and 87 m of NPS 10 natural gas pipelines to replace five existing well laterals in the Waubuno Storage Pool.

On December 19, 2025, the OEB issued the Notice of Hearing (Notice) and the Letter of Direction for the proceeding. The OEB has directed Enbridge Gas to serve a copy of the Notice, Enbridge Gas's Application and the evidence on all property owners and encumbrancers with lands or interest in lands directly affected by the proposed pipeline and related facilities.

Enclosed please find the OEB's Notice's (English and French versions) along with Enbridge Gas's Application and select key exhibits (listed below) as filed with the OEB in the above noted proceeding:

- Exhibit A-2-1 – Application
- Exhibit A-2-1 – Attachment 1 - Project Map
- Exhibit B-1-1 – Project Need
- Exhibit C-1-1 – Alternatives
- Exhibit D-1-1 – Proposed Project, Engineering, and Construction
- Exhibit E-1-1 – Project Cost & Economics
- Exhibit F-1-1 – Environmental Matters
- Exhibit G-1-1 – Land Matters and Agreements
- Exhibit H-1-1 – Indigenous Consultation
- Exhibit I-1-1 – Conditions of Approval

The full Application and evidence are available on the Enbridge Gas website by accessing the link below and navigating to "Regulatory Information."

<https://www.enbridgegas.com/about-enbridge-gas/projects/Waubuno-Gathering-System-and-Compressor-Replacement-Project>

## Exhibit D

A paper copy of the evidence filed in this proceeding (including all attachments and appendices) is available upon request.

Please contact me if you have any questions.

### **Preet Gill**

Regulatory Coordinator

#### *Enbridge Gas Inc.*

500 Consumers Road | North York, Ontario | M2J 1P8

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**EB-2025-0307 - Waubuno Gathering System and Compressor Replacement Expansion Project - Notice of Application**

---

**From** Preet Gill <preet.gill@enbridge.com>

**Date** Wed 1/7/2026 12:10 PM

**To** Irosales@aamjiwnaang.ca <Irosales@aamjiwnaang.ca>; cjackson@aamjiwnaang.ca <cjackson@aamjiwnaang.ca>; abeveridge@aamjiwnaang.ca <abeveridge@aamjiwnaang.ca>; jwrightman@aamjiwnaang.ca <jwrightman@aamjiwnaang.ca>

2 attachments (2 MB)

Notice of Application.pdf; Application & Evidence.pdf;

Good Afternoon,

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- Approximately 1.1 km of Nominal Pipe Size (NPS) 12 steel natural gas pipeline from the Waubuno Pool Station to Enbridge Gas's existing NPS 36 Dawn to Corunna pipeline to replace the Waubuno Compressor Package.
- Approximately 640 m of NPS 12 natural gas pipeline to replace existing NPS 6, 8, and 10 sections of the Waubuno Gathering Line and approximately 280 m of NPS 8 and 87 m of NPS 10 natural gas pipelines to replace five existing well laterals in the Waubuno Storage Pool.

On December 19, 2025, the OEB issued the Notice of Hearing (Notice) and the Letter of Direction for the proceeding. The OEB has directed Enbridge Gas to serve a copy of the Notice, Enbridge Gas's Application and the evidence on all property owners and encumbrancers with lands or interest in lands directly affected by the proposed pipeline and related facilities.

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- Exhibit H-1-1 – Indigenous Consultation
- Exhibit I-1-1 – Conditions of Approval

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[https://www.enbridgegas.com/about-enbridge-gas/projects/Waubuno-Gathering-System-and-Compressor-  
Replacement-Project](https://www.enbridgegas.com/about-enbridge-gas/projects/Waubuno-Gathering-System-and-Compressor-<del>Expansion</del><br/>Replacement-Project)

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## EB-2025-0307 - Waubuno Gathering System and Compressor Replacement Expansion Project - Notice of Application

---

**From** Preet Gill <preet.gill@enbridge.com>  
**Date** Wed 1/7/2026 12:10 PM  
**To** jmills@cottfn.com <jmills@cottfn.com>

2 attachments (2 MB)

Notice of Application.pdf; Application & Evidence.pdf;

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## EB-2025-0307 - Waubuno Gathering System and Compressor Replacement Expansion Project - Notice of Application

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**From** Preet Gill <preet.gill@enbridge.com>

**Date** Wed 1/7/2026 12:11 PM

**To** verna.george@kettlepoint.org <verna.george@kettlepoint.org>; consultation@kettlepoint.org <consultation@kettlepoint.org>

2 attachments (2 MB)

Application & Evidence.pdf; Notice of Application.pdf;

Good Afternoon,

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[https://www.enbridgegas.com/about-enbridge-gas/projects/Waubuno-Gathering-System-and-Compressor-  
Replacement-Project](https://www.enbridgegas.com/about-enbridge-gas/projects/Waubuno-Gathering-System-and-Compressor-<del>Expansion</del><br/>Replacement-Project)

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## EB-2025-0307 - Waubuno Gathering System and Compressor Replacement Expansion Project - Notice of Application

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**From** Preet Gill <preet.gill@enbridge.com>  
**Date** Wed 1/7/2026 12:12 PM  
**To** environment@oneida.on.ca <environment@oneida.on.ca>

2 attachments (2 MB)

Application & Evidence.pdf; Notice of Application.pdf;

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**Preet Gill**

Regulatory Coordinator

***Enbridge Gas Inc.***

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## EB-2025-0307 - Waubuno Gathering System and Compressor Replacement Expansion Project - Notice of Application

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**From** Preet Gill <preet.gill@enbridge.com>

**Date** Wed 1/7/2026 12:13 PM

**To** peter.mayhew@wifn.org <peter.mayhew@wifn.org>; dean.jacobs@wifn.org <dean.jacobs@wifn.org>

2 attachments (2 MB)

Notice of Application.pdf; Application & Evidence.pdf;

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## EB-2025-0307 - Waubuno Gathering System and Compressor Replacement Expansion Project - Notice of Application

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**From** Preet Gill <preet.gill@enbridge.com>

**Date** Wed 1/7/2026 12:05 PM

**To** consultations@metisnation.org <consultations@metisnation.org>

2 attachments (2 MB)

Application & Evidence.pdf; Notice of Application.pdf;

Good Afternoon,

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*Enbridge Gas Inc.*

500 Consumers Road | North York, Ontario | M2J 1P8

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## EB-2025-0307 - Waubuno Gathering System and Compressor Replacement Expansion Project - Notice of Application

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**From** Preet Gill <preet.gill@enbridge.com>  
**Date** Wed 1/7/2026 4:17 PM  
**To** EnviroOnt@tc.gc.ca <EnviroOnt@tc.gc.ca>

2 attachments (2 MB)

Application & Evidence.pdf; Notice of Application.pdf;

Good Afternoon,

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Outlook

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## EB-2025-0307 - Waubuno Gathering System and Compressor Replacement Expansion Project - Notice of Application

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**From** Preet Gill <preet.gill@enbridge.com>

**Date** Wed 1/7/2026 12:04 PM

**To** OPCC.Chair <opcc.chair@oeb.ca>; omafra.eanotices@ontario.ca <omafra.eanotices@ontario.ca>; Barboza, Karla (She/Her) (MCM) <karla.barboza@ontario.ca>; heritage@ontario.ca <heritage@ontario.ca>; Hamilton, James (MCM) <james.hamilton@ontario.ca>; marc.boucher@ontario.ca <marc.boucher@ontario.ca>; McCabe, Shannon (She/Her) (MEM) <shannon.McCabe@ontario.ca>; McCabe, Shannon (She/Her) (MEM) <shannon.McCabe@ontario.ca>; jake.noordhof@ontario.ca <jake.noordhof@ontario.ca>; sourceprotectionscreening@ontario.ca <sourceprotectionscreening@ontario.ca>; eanotification.cregion@ontario.ca <eanotification.cregion@ontario.ca>; nick.cole@infrastructureontario.ca <nick.cole@infrastructureontario.ca>; julianna.zhuo@ontario.ca <julianna.zhuo@ontario.ca>; michael.elms@ontario.ca <michael.elms@ontario.ca>; dan.ethier@ontario.ca <dan.ethier@ontario.ca>; erick.boyd@ontario.ca <erick.boyd@ontario.ca>; Anna.Little@ontario.ca <anna.little@ontario.ca>; environmental.planning.team@ontario.ca <environmental.planning.team@ontario.ca>; ghighfield@tssa.org <ghighfield@tssa.org>; Robin Yu <ryu@tssa.org>

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## Waubuno Gathering System and Compressor Replacement Project

Enbridge Gas is proposing to construct a 12-inch steel natural gas pipeline, approximately 1.1 km in length to replace its existing compressor at the Waubuno Pool Station located in St. Clair Township, Ontario. The current compressor is used for natural gas storage injection operations and is nearing the end of its lifecycle. Construction of the new pipeline will enable the use of compression at the nearby Dawn Operations Centre to fill the pool to its maximum operating pressure.

The proposed pipeline would begin at the existing Waubuno Pool Station at 2550 Telfer Road. It would then travel north along the west side of Telfer Road to Oil Springs Line, and then east along the south side of Oil Springs Line. It would then tie into the existing 36-inch Enbridge Gas Dawn to Corunna pipeline, located at across from 2222 Oil Springs Line. The existing Waubuno Pool Station at 2550 Telfer Road would also be rebuilt in order to enable the tie-in to the new pipeline and to remove the existing Waubuno Compressor.

The proposed project also involves replacement of the Waubuno Gathering Lines and select well laterals in the Waubuno Storage Pool. Together, these are referred to as the Waubuno Gathering System. The Waubuno Gathering system is a network of pipelines that are used to transport gas to and from the storage pool wells during injection and withdrawal operations. This would involve the abandonment and replacement of the existing Gathering Pipelines (4, 6, 8, and 10 inches in diameter) with 640 meters of new 12-inch pipeline. It would also involve like-for-like replacement of a 8-inch and 10-inch well lateral and the upsizing of three existing 4-inch diameter lateral pipelines to 8-inches.



[View larger map](#)

### Project status/timeline



### Project information

Project updates
Project calendar
Project consultation
Regulatory information
Contact information

#### Regulatory information

The Waubuno Storage Pool is used for both regulated and unregulated storage operations. The Waubuno Gathering System and Compressor Replacement Project itself is regulated by the Ontario Energy Board (OEB), an independent government agency that regulates the electricity and natural gas sectors. After a public review and hearing, the OEB will determine whether to approve the project. In this section, you can review all regulatory files about the project when they become available.

#### Environmental Report

In consideration of the impact identification and assessment process outlined in the OEB's [Environmental Guidelines](#), Enbridge Gas retained the services of Stantec Consulting Ltd., an independent environmental consultant, to complete an environmental assessment for the proposed project.

The purpose of the environmental assessment is to:

- Identify any potential impacts of the proposed project on the social, economic and natural environments
- Identify local or provincial concerns regarding the proposed project
- determine preferred routing of the pipeline segments
- gather input from agencies, stakeholders, First Nations and Métis, affected landowners, and the public.

In addition, it recommends mitigation measures to limit impacts on the social, economic and natural environments. It is important to minimize potential negative impacts of the proposed natural gas distribution pipelines and associated facilities on the environment.

The data, analysis and results of the environmental assessment are detailed in an environmental report. You can read the environmental report [here](#).

#### Leave to Construct Application

Enbridge Gas filed a Leave to Construct application with the OEB on Nov. 24, 2025. You can view the application [here](#).

#### Notice of a Hearing

The OEB has issued a Notice of a Hearing. You can read it [here](#).