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BY EMAIL

February 5, 2026

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

Dear Ritch Murray:

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

In accordance with OEB's Procedural Order No.1, please find attached OEB staff's submission in the above proceeding. The attached document has been forwarded to Enbridge Gas Inc. and to all other registered parties to this proceeding.

Yours truly,

Randy Doradat
Advisor, Natural Gas

Encl.

c: All parties in EB-2025-0271



ONTARIO ENERGY BOARD

OEB Staff Submission

Enbridge Gas Inc.

Washago Community Expansion

Project

EB-2025-0271

February 5, 2026

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Application Summary and Process

Enbridge Gas Inc. (Enbridge Gas) applied to the Ontario Energy Board (OEB) on October 7, 2025, under section 90 and 97 of the *Ontario Energy Board Act, 1998*, (OEB Act) for an order granting leave to construct approximately 22 kilometres of natural gas distribution pipelines and associated facilities in the community of Washago and surrounding areas in the Township of Severn and the Town of Gravenhurst (Project). The Project is part of the Natural Gas Expansion Program (NGEP).¹

The Project consists of:

- 4.9 km of Nominal Pipe Size (NPS) 4 polyethylene (PE) Intermediate pressure (IP) natural gas distribution pipeline
- 180 m of NPS 4 Steel IP natural gas distribution pipeline for railway crossings
- 17.1 km of NPS 2 PE IP natural gas distribution pipeline
- Ancillary facilities including a new distribution station at the Trans Canada Energy tie-in location and customer services (meters, regulators and service pipelines)

Enbridge Gas also applied to the OEB under section 97 of the OEB Act for approval of the form of land-use agreements it offers to landowners affected by the routing or location of the Project. Enbridge Gas has a municipal franchise agreement with each of the Township of Severn² and the Town of Gravenhurst³. Enbridge Gas also holds a Certificate of Public Convenience and Necessity (CPCN) for works within each of the Township of Severn and the Town of Gravenhurst. These franchise agreements and certificates allow Enbridge Gas to construct, operate and add to the natural gas distribution system within all parts of the municipality.

A general location of the Project⁴ is shown on the map below:

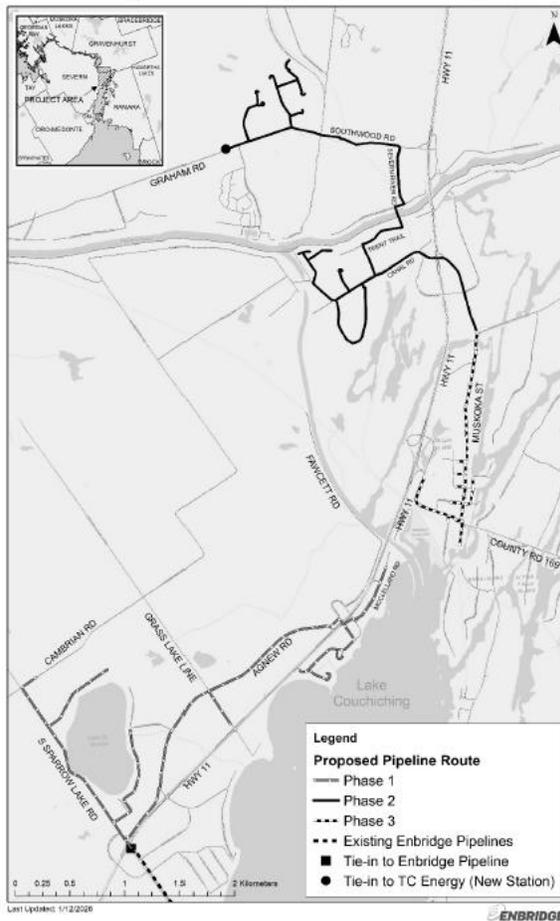
¹ EB-2019-0255, OEB's Report to the Minister of Energy, Northern Development and Mines and the Associate Minister of Energy: Potential Projects to Expand Access to Natural Gas Distribution, December 10, 2020

² EB-2022-0232, expiring on December 21, 2042

³ EB-2023-0239, expiring on December 23, 2043

⁴ Response to STAFF-2 a), Attachment 1, page 1

Washago Community Expansion Project



The Project will make natural gas available to approximately 473 forecasted customers in the community of Washago and surrounding areas.

The Project is planned to be constructed in three phases. The construction is planned to start by April 2027 to start providing services in the 2027/2028 heating season. Enbridge Gas explained that the Project construction phasing is based on the availability of construction crews, seasonal factors and community-specific timelines.⁵ The OEB issued a Notice of Hearing on October 31, 2025.

In Procedural Order No. 1, issued on December 9, 2025, the OEB provided for a written hearing. OEB staff filed interrogatories on December 23, 2025 and Enbridge Gas filed its interrogatory responses on January 22, 2026. Written submission by OEB staff must be filed by February 5, 2026. Enbridge Gas' written reply submission is due on February 19, 2026.

⁵ Response to STAFF-2 b)

OEB Staff Submission

OEB staff supports the approval of Enbridge Gas's leave to construct application, subject to receiving and considering MEM's Letter of Opinion, and subject to the OEB's standard conditions of approval for natural gas leave to construct applications. OEB staff also supports the approval of the forms of land-use agreements proposed by Enbridge Gas.

Consistent with the [OEB's Standard Issues List](#) for natural gas leave to construct applications, OEB staff's submission is structured to address the following issues:

1. Project Need
2. Project Alternatives
3. Project Cost and Economics
4. Environmental Impacts
5. Landowner Matters
6. Indigenous Consultation
7. Conditions of Approval

Project Need

The Project was selected to receive funding, as part of the Ontario Government's Phase 2 NGEF. The NGEF provides funding to Ontario natural gas distributors to expand natural gas to communities that are not currently connected to the natural gas system. Ontario Regulation 24/19⁶ (Expansion of Natural Gas Distribution Systems Regulation), made under the OEB Act, sets out the funding mechanism and specifies the projects selected to receive the government funding as well as the amount of funding allocated to each project.⁷

Enbridge Gas provided evidence of the need for the Project through the results of independent market research and its own community outreach. Enbridge Gas stated that the Project is anticipated to provide natural gas service to approximately 473 customers, including 447 residential and 26 commercial customers in the Township of Severn and the Town of Gravenhurst.

Enbridge Gas has consulted with the Township of Severn and the Town of Gravenhurst. Both municipalities support the Project.⁸

Enbridge Gas retained Forum Research Inc. (Forum Research) to conduct quantitative

⁶ Ontario Regulation 24/19: Expansion of Natural Gas Distribution Systems, under Ontario Energy Board Act, 1998, S.O. 1998, c. 15 Sched B, current June 8, 2021.

⁷ The Expansion of Natural Gas Systems Regulation sets the mechanism for sourcing the funding of the eligible expansion projects by requiring that rate-regulated natural gas distributors charge each of their customers \$1 per month.

⁸ Exhibit B, Tab 1, Schedule 1, Attachment 2; Letter of Support by the Township of Severn, June 12, 2025; Attachment 3: Letter of Support by the Town of Gravenhurst, September 24, 2025.

research to assess the interest in natural gas service to establish the need for the Project.⁹ A total of 296 surveys were completed between July 23, 2023 and August 9, 2023. The results of the Forum Research surveys indicate that 83% of the respondents are extremely likely, very likely or likely to connect to the natural gas service and 78% within one year of service availability. Forecasted customer attachments are also informed by current Municipal Property Assessment Corporation data. Enbridge Gas said it would continue to promote the natural gas service to the residents in the Project area to increase customer attachments.

Below is the table showing forecast customer attachments to the expanded distribution system over ten years.¹⁰

Table 1: Forecasted Customer Attachments for the Project

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

Enbridge Gas confirmed in response to an OEB staff interrogatory¹¹ that the forecast of customer attachments has not changed since Enbridge Gas filed the application on October 7, 2025. Enbridge Gas continues to monitor factors, such as adjustments for the Extra Length Charge and validation field validation of serviceability. These factors may result in refinement of the forecast attachments. Enbridge Gas has committed to continue promoting natural gas service to residents in the Project area.

OEB staff submits that Enbridge Gas has established the need for the Project. OEB staff notes that the Project is supported by the Township of Severn and the Town of Gravenhurst. The need for the Project is further supported by the fact that the Project was selected by the Ontario Government as one of the community expansion projects to receive NGEF funding in support of the government's efforts to provide access to natural gas distribution service to unserved communities in Ontario.

OEB staff also notes that the Government of Ontario released its Integrated Energy Plan, *Energy for Generations*, on June 25, 2025. It contains the Natural Gas Policy Statement, which affirms the role of natural gas as part of Ontario's energy mix and

⁹ Exhibit B, Tab 1, Schedule 1, Attachment 5: Natural Gas Pipeline Expansion Study: Washago Project, August, 2023

¹⁰ Exhibit B, Tab 1, Schedule 1, page 5, Table 1: Forecasted Customers Attachments for the Project

¹¹ Response to STAFF-3 a)-c)

notes that “homeowners in rural and northern areas who do not have access to natural gas, want the option to have it through expansion of the natural gas network.”¹². OEB staff submits that the need for the Project, supported under NGEF, is aligned with this policy.

Project Alternatives

Enbridge Gas considered facilities alternatives as well as Integrated Resources Planning (IRP) alternatives to the Project. To assess IRP alternatives to the Project, Enbridge Gas applied Binary Screening Criteria set by the OEB approved Integrated Resource Planning Framework (IRP Framework)¹³. Enbridge Gas concluded that according to the Binary Screening Criteria set out by the IRP Framework, Enbridge Gas is not required to develop IRP Plan for the Project because the Project is a Community Expansion Project supported by NGEF.

Enbridge Gas considered alternative routes for some segments of the facilities, but an evaluation of the preliminary preferred route determined that the proposed route is the most suitable. This determination was supported by the Environmental Report filed with the application.

Based on Enbridge Gas’s evidence, OEB staff submits that the Project is the best alternative to meet the forecasted need. Also, in OEB staff’s view, Enbridge Gas appropriately assessed that IRP alternatives are not viable to address the forecast need for gas distribution services.

Project Cost and Economics

Total Project cost is estimated to be \$28.1 million, consisting of \$22.9 million for the pipeline facilities, for which the approval is sought, and \$5.2 million for the ancillary facilities costs which are not subject to this application. The estimated Project costs are set in the table below:¹⁴

¹² Integrated Energy Plan, *Energy for Generations*, June 25, 2025, page 96

¹³ EB-2020-0091, OEB IRP Framework (Appendix A of OEB Decision and Orders, July 22, 2021).

¹⁴ Exhibit E, Tab 1, Schedule 1, page 1, paragraph 1 Table 1: Estimated Project Costs (\$CAD)

Table 1: Estimated Project Costs (\$CAD)

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

Total Project Costs are lower than the amount estimated in Enbridge Gas's original project proposal to the Government of Ontario for funding under Phase 2 of the NGEP by approximately \$768,812.¹⁵ Enbridge Gas explained that the cost variance is mainly due to a decrease in the forecasted pipe lengths and a decrease in forecasted customer attachments, which was a result of field investigations that identified constructability constraints in specific areas.¹⁶

The Estimated Project Costs includes a 20% contingency applied to all direct costs. Enbridge Gas noted that this contingency amount has been calculated based on the risk profile of the Project and that it is consistent with contingency amounts calculated for similar Enbridge Gas Phase 2 NGEP projects, as shown in the table below.¹⁷ Enbridge gas noted that the two similar Phase 2 NGEP projects included in comparison were approved while two others are under OEB review.

Table 1
Past LTC Projects with Contingency

Item	Project Name	Docket	Percent Contingency used in LTC Application	Current Proceeding Status
1	Haldimand Shores	EB-2022-0088	20%	OEB Decision (project approved)
2	Glendale Subdivision	EB-2024-0325	20%	OEB Decision (project approved)
3	Humber Station	EB-2025-0270	20%	PO No. 1 (Dec 18, 2025)
4	Cedar Springs	EB-2025-0313	20%	Notice (Dec 15, 2025)

¹⁵ EB-2019-0255¹⁶ Exhibit E, Tab 1, Schedule 1, pages 1-2¹⁷ Response to STAFF-5, page 2

The Project is selected to receive \$19.2 million government funding from NGEF. The System Expansion Surcharge (SES) of \$0.23 per m³ would be charged to customers attaching to the Project over 40 years. Enbridge Gas stated that a Discounted Cash Flow (DCF) analysis was undertaken applying a 40-year project time horizon in accordance with E.B.O. 188.¹⁸ Enbridge Gas DCF analysis indicates that the Project is economically feasible with PI of 1.04. The revenues include the NGEF funding and SES.

Enbridge Gas submitted it would bear the risk of lower than forecasted customer attachments and higher capital expenditure forecast during ten-year Rate Stability Period (RSP). Any variances from forecasted Project capital cost or revenues, including variances in the customer attachment forecast, will be managed by Enbridge Gas during the RSP. Enbridge Gas stated that if the RSP expires during Incentive Rate Mechanism (IRM) and not in the rebasing year, any excess or shortfall of revenue would form part of the utility revenue that is subject to earnings sharing until the next rebasing.

OEB staff has no concerns about the cost estimates or economics for the Project provided Enbridge Gas follows the approach to bearing the risk of lower than forecasted customer attachments and higher actual capital cost than estimated. In OEB staff's view 20% contingency is appropriate as it is consistent with the Project's design stage and with contingency levels for similar Phase 2 NGEF projects.

Environmental Impacts

Environmental Report (ER) for the Project¹⁹ was completed by Dillon Consulting Limited (Dillon) in accordance with the OEB's Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th Edition, 2023 (OEB Environmental Guidelines).

Enbridge Gas stated that the ER was circulated to the Ontario Pipeline Coordinating Committee (OPCC), municipalities, conservation authorities, and Indigenous communities on July 6, 2025. Enbridge Gas filed the comments received on the ER as part of its evidence.²⁰ Enbridge Gas continued the stakeholder consultation after filing the application. In response to OEB staff interrogatories²¹ filed updated log of stakeholder consultation from September 9, 2025 to December 15, 2025. There are no outstanding concerns recorded in the updated consultation log.

According to Enbridge Gas, the mitigation measures and monitoring and contingency

¹⁸ Exhibit E, Tab 1, Schedule 1, Attachment 1, pages 1-4

¹⁹ Exhibit F, Tab 1, Schedule 1, Attachment 1: Washago Community Expansion Project Environmental Report

²⁰ Exhibit F, Tab 1, Schedule 1: Environmental Report, Appendix G: Stakeholder Engagement Logs

²¹ Response to STAFF-6 Attachment 1, pages 1-2

plans set out in the ER and additional mitigation measures provided by regulatory agencies through the permitting and approval process, construction of the Project will have negligible impacts on the environment. Enbridge Gas also stated that no significant environmental or cumulative effect would be caused by the Project.²²

Enbridge Gas stated that Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment (CHRECPIA) and Stage 1 Archaeological Assessment (AA) were submitted for review to the Ministry of Citizenship and Multiculturalism (MCM). A Stage 2 AA will be conducted in spring of 2026 and submitted to MCM for review.

The Stage 1 AA report is included in the ER. Consulted Indigenous communities had the opportunity to review the Stage 1 AA Report as part of the ER review. No comments were received from the Indigenous communities on the Stage 1 AA Report. Enbridge Gas will notify the Indigenous communities in advance of the scheduled Stage 2 AA survey and will be offered participation in the field studies. Enbridge Gas confirmed it will consider the comments and input of Indigenous communities and mitigation measures if Stage 2 AA survey identifies any archaeological resources.²³

On August 18, 2025, Enbridge Gas sent an application for the design of the proposed facilities to the Technical Standards & Safety Authority (TSSA).²⁴ In response to OEB staff interrogatories²⁵ Enbridge Gas indicated that the TSSA has completed the review of technical design of the Project and found it complies with the applicable regulations and standards. The TSSA's review letter with an attached report was submitted on the record.²⁶

OEB staff submits that Enbridge Gas has completed the ER in accordance with the OEB's Environmental Guidelines. OEB staff notes that Enbridge Gas continues to respond to any comments by the stakeholders and Indigenous communities related to the Project's environmental assessment. OEB staff has no concerns about the environmental aspects of the Project, based on Enbridge Gas's commitment to implement the mitigation measures set out in the ER.

OEB staff submits that Enbridge Gas's compliance with the OEB's standard conditions of approval for leave to construct natural gas projects will ensure that impacts of pipeline construction are mitigated and monitored. OEB staff notes that the conditions of approval also require Enbridge Gas to obtain all necessary approvals, permits, licences, and certificates needed to construct, operate and maintain the Project.

²² Exhibit F, Tab 1, Schedule 1, page 5, paragraph 15

²³ Response to STAFF-8 b)-c)

²⁴ Exhibit D, Tab 1, Schedule 1, pages 8-9

²⁵ Response to STAFF-8 a)-b)

²⁶ Response to STAFF-8 a)-b) Attachment 1- TSSA Review Report, October 1, 2025

Landowner Matters

Enbridge Gas stated that the Project would follow the public road allowance for the majority of the proposed pipeline route. Municipal consent to construct within road allowances will have to be obtained from the Township of Severn and the Town of Gravenhurst. Enbridge Gas may require permanent easements and will ensure that all necessary agreements are required in advance of construction start. Enbridge Gas will also need to obtain rights for temporary working areas at locations to be determined by the construction contractor.

The evidence includes forms of permanent and temporary land use agreements Enbridge Gas has offered or will offer to the directly impacted landowners.²⁷ The forms of these agreements have been previously approved by the OEB for use in Enbridge Gas's Ridge Landfill RNG Project.²⁸

OEB staff submits that the OEB should approve the proposed forms of easement agreement and temporary working area agreement as both were previously approved by the OEB.

Indigenous Consultation

On October 15, 2024, in accordance with the OEB Environmental Guidelines, Enbridge Gas contacted the Ministry of Energy and Mines (MEM) in respect of the Crown's duty to consult related to the Project.²⁹

MEM, by way of letter dated January 17, 2025, identified ten Indigenous communities to be consulted in relation to the Project and delegated procedural aspects of the consultation to Enbridge Gas (Delegation Letter)³⁰:

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

²⁷ Exhibit G, Tab 1, Attachment 1 and Attachment 2

²⁸ EB-2022-0203

²⁹ Exhibit H, Tab 1, Schedule 1, Attachment 1

³⁰ Exhibit H, Tab 1, Schedule 1, Attachment 2

On March 4, 2025, Enbridge Gas sent, via email, a Notice of Upcoming Project to the identified Indigenous communities. Enbridge Gas also published the Notice of Upcoming Project in Orillia Matters from March 28, 2025 to April 17, 2025.

The application includes an Indigenous Consultation Report (ICR), along with logs and copies of communication documentation.³¹ The ICR summarizes Indigenous consultation activities. The ICR covers consultation activities up to September 7, 2025 and a communication log from March 4, 2025 to August 25, 2025. The ICR has also been provided to MEM.

The ICR is being reviewed by the MEM. The MEM will form an opinion as to whether the procedural aspects of consultation undertaken by Enbridge Gas to-date for the purpose of the application for leave to construct for the Project are satisfactory. Determination by the MEM will be in a form of a Letter of Opinion to Enbridge Gas. Enbridge Gas is expected to file the MEM's Letter of Opinion with the OEB as soon it is received. This Letter of Opinion will be considered by the OEB as part of its deliberations.

On October 31, 2025, Enbridge Gas served OEB's Notice of Hearing to all the above-noted Indigenous communities, as directed by the OEB in its Letter of Direction.

In response to OEB staff interrogatories Enbridge Gas filed an updated ICR documenting the consultation as of January 19, 2026.³²

Enbridge Gas stated that no Indigenous communities specified Aboriginal or treaty rights that could be adversely impacted by the Project.³³ The ICR summarizes concerns, issues and inquiries raised by the Indigenous communities during the consultation up to January 19, 2026. Concerns and comments Enbridge Gas recorded and described in the ICR are mostly related to environmental impacts and mitigation, archaeological surveys, and expectations of information sharing related to mitigation, monitoring and restoration of land and waters. Enbridge Gas has committed to ongoing engagement with Indigenous communities in relation to the Project.³⁴

The MEM Delegation Letter indicates MEM's preliminary assessment of the level of consultation to be conducted by Enbridge Gas for each of the ten Indigenous Communities. MEM has assessed the level of consultation at low for Huron-Wendat Nation and at a moderate level for the remaining nine Indigenous communities and Nations. The Delegation Letter states that Enbridge Gas should inform the MEM if, during the consultation, information warranting a deeper level of consultation becomes available. In that instance, Enbridge Gas must contact the MEM for updated guidance. In response to OEB staff interrogatories, Enbridge Gas indicated it did not acquire any

³¹ Exhibit H, Tab 1, Schedule 1, Attachment 7 and Attachment 8

³² Response to STAFF-11, Attachment 2, ICR, January 19, 2026, pages 1-10

³³ Response to STAFF-11 a)

³⁴ Response to STAFF-11, Attachment 2, ICR, January 19, 2026, pages 1-10

additional information that would suggest a deeper level of consultation than as set in the Delegation Letter by MEM.³⁵

Enbridge Gas's mode of consultation with Indigenous communities includes emails, virtual meetings and in person meetings. Enbridge Gas met virtually or in person with Wendat Nation, Chippewas of Georgina Island First Nation and Curve Lake First Nation.³⁶

In addition to formal communication with the MEM that is documented on the record of the proceeding, Enbridge Gas meets monthly with MEM staff to discuss the status of consultation on the ongoing projects and applications before the OEB. Enbridge Gas noted that no formal minutes are taken for these meetings, but the information exchange assists in the consultation process.³⁷

Enbridge Gas stated that it expects a Letter of Opinion from the MEM near the closing of the record for the proceeding.³⁸

Consulted Indigenous communities expressed interest in participating in archaeological surveys related to the Project. Enbridge Gas has committed to inviting formally each of the ten consulted communities to participate in Stage 2 AA field surveys.³⁹

On December 12, 2025, Wendat Nation filed a Letter of Comment to inform the OEB of specific concerns regarding receipt of the ER and Stage 1 AA and Stage 2 AA reports during the planning phase. Wendat Nation's letter of comment included, among other things, a request that Enbridge Gas provide Stage 2 AA report to Wendat Nation 30 days prior to the submission of the ER for stakeholder review.

Enbridge Gas responded to Wendat Nation's comments in a letter dated January 22, 2026, filed separately on the record and included it in response to OEB staff interrogatories.⁴⁰

Regarding the letter of comment by Wendat Nation and response by Enbridge Gas, OEB staff notes that Enbridge Gas offered a clarification why Stage 2 AA survey is typically conducted after the completion of the ER when the final preferred route has been determined. Enbridge Gas explained that, timing and location of Stage 2 AA surveys would minimize unnecessary or premature ground disturbance. OEB staff also notes that it is accepted practice to start fieldwork, for Stage 2 AA, after the final ER is completed and prior to construction start. OEB staff also notes that Wendat Nation had the opportunity to review the Stage 1 AA report during its review of draft ER. OEB staff observes that Enbridge Gas has committed to invite all ten Indigenous communities,

³⁵ Response to STAFF-11 b)

³⁶ Response to STAFF-11 e)

³⁷ Response to STAFF-11 g)

³⁸ Response to STAFF-11 i)

³⁹ Response to STAFF-11 f)

⁴⁰ Response to STAFF-13, Attachment 1, pages 1-4

including Wendat Nation, to participate in Stage 2 AA survey and review the Stage 2 AA report. OEB staff's view is that Enbridge Gas is adhering to the OEB Environmental Guidelines to address the assessment of archaeological resources.

Enbridge Gas offered capacity funding to each of the ten Indigenous communities identified as potentially impacted by the Project. According to Enbridge Gas, capacity funding will support technical review of project documents and engagement in meaningful consultation. Capacity funding to an Indigenous community usually supports review of Environmental Report and Archaeological Assessment and onsite monitoring of archeological surveys. Alderville First Nation, Mississaugas of Scugog Island First Nation and Wendat Nation received capacity funding to participate in the consultation. No Indigenous community raised concerns to the OEB about the capacity funding quantum or any other aspect of capacity funding.⁴¹

OEB Staff submits that the OEB should not grant any approval of the application until after it has received and considered MEM's Letter of Opinion. If the letter of opinion is not filed by the close of the record, the OEB may consider placing the proceeding in abeyance until such time that the letter is filed.

OEB staff observes that Enbridge Gas's consultation with the Indigenous communities is ongoing and that Enbridge Gas has committed to continue engagement with the Indigenous communities during the life of the Project.⁴² OEB staff notes that, to the extent that the letter of opinion may identify outstanding issues, the OEB could provide additional procedural steps to address these issues.

Conditions of Approval

The OEB has established standard conditions of approval that are typically imposed in leave to construct approvals.⁴³ Enbridge Gas stated that it has reviewed these standard conditions and has not identified any additional or revised conditions that it wishes to propose for the Project.

Subject to receiving and considering MEM's Letter of Opinion, OEB staff submits that the OEB should approve the Project subject to the OEB's standard conditions of approval for natural gas leave to construct applications.

~All of which is respectfully submitted~

⁴¹ Response to STAFF-12, a)-b)

⁴² Exhibit H, Tab 1, Schedule 1, page 4

⁴³ Natural Gas Facilities Handbook, Appendix D