

ONTARIO ENERGY BOARD

Proceeding Number: EB-2025-0307

Interrogatories of Donald Kabbes to Enbridge Gas Inc.

(Filed pursuant to Procedural Order No. 1)

Filed and served: February 17th, 2026

Directed to: Enbridge Gas Inc. (“EGI”)

Generative Artificial Intelligence Disclosure (Rule 9.03)

Portions of this filing were prepared with the assistance of generative artificial intelligence. The intervenor has reviewed and verified the accuracy of the content generated by generative artificial intelligence without the assistance of generative artificial intelligence.

Definitions

1. **“Preferred Route”** means the proposed alignment of the NPS 12 high-pressure natural gas pipeline as filed by Enbridge Gas, located primarily within municipal road allowance along Telfer Sideroad and Oil Springs Line.
2. **“Alternative Agricultural Route”** means a feasible routing alternative across non-residential agricultural lands, including across the Kabbes property and the adjoining Lang property, connecting to the existing transmission pipeline away from residential dwellings.
3. **“Residential Dwelling”** means an occupied residence located adjacent to or near the Preferred Route.

A. Routing Alternatives and Route Selection

(Exhibit C – Alternatives; Exhibit A – Application)

C DK-1

Reference: Exhibit C (Alternatives), sections addressing route selection and alternatives; Exhibit A, Attachment 1 (Project Map).

Please identify all routing alternatives considered for the proposed NPS 12 pipeline segment in St. Clair Township, including any alternatives intended to reduce proximity to Residential Dwellings.

C DK-2

Reference: Exhibit C (Alternatives).

Please confirm whether Enbridge Gas evaluated an Alternative Agricultural Route.

- a) If yes, please describe the evaluation and the reasons it was not selected.
- b) If no, please explain why such an alternative was not evaluated.

C DK-3

Reference: Exhibit C (Alternatives).

Please identify the criteria used by Enbridge Gas to assess and compare routing alternatives (e.g., constructability, cost, schedule, safety, socio-economic impacts, environmental impacts) and indicate whether any weighting was applied to those criteria.

B. Project Description and Route Location

(Exhibit A – Application; Exhibit F – Environmental Matters)

A DK-4

Reference: Exhibit A, Attachment 1 (Project Map).

Please confirm the total length (kilometers) of the proposed NPS 12 pipeline and identify the approximate length located within municipal road allowance versus private lands.

F DK-5

Reference: Exhibit F-1-1 (Environmental Report), routing figures and land-use sections.

Please confirm whether plan-and-profile drawings or alignment figures showing the proximity of the Preferred Route to Residential Dwellings are included in the Environmental Report, and if so, identify the specific figures or appendices.

C. Residential Proximity and Socio-Economic Impacts

(Exhibit F – Environmental Matters)

F DK-6

Reference: Exhibit F-1-1 (Environmental Report), socio-economic and land-use sections.

Please state the number of Residential Dwellings located within each of the following distances from the Preferred Route centerline:

- a) within 15-30 meters;

- b) within 30–60 meters;
- c) within 60–100 meters.
- d) > 100 meters

F DK-7

Reference: Exhibit F-1-1 (Environmental Report), construction effects and mitigation sections.

Please describe the anticipated construction impacts of the Preferred Route on nearby Residential Dwellings, including impacts on driveway access, pedestrian safety, traffic disruption, and restoration of lawns, landscaping, farmland and farm entrances.

F DK-8

Reference: Exhibit F-1-1 (Environmental Report); Exhibit C (Alternatives).

Please explain how Enbridge Gas determined that routing the pipeline within residential road allowances minimizes socio-economic impacts compared with routing across non-residential agricultural lands, if such a comparison was performed. If no comparison was performed, please explain why.

D. Safety, Pressure, and Risk Considerations

(Exhibit D – Proposed Project)

D DK-9

Reference: Exhibit D (Proposed Project), engineering design and specifications.

Please confirm for the proposed NPS 12 pipeline segment:

- a) the Maximum Allowable Operating Pressure (MAOP);
- b) the design pressure; and
- c) the hydrostatic test pressure.

D DK-10

Reference: Exhibit D (Proposed Project), safety and integrity sections.

Please describe whether Enbridge Gas assessed the consequences of a pipeline failure in residential areas compared to non-residential agricultural areas, and whether this assessment influenced routing decisions.

D DK-11

Reference: Exhibit D (Proposed Project).

Please confirm whether Enbridge Gas applies any different integrity management,

monitoring, or maintenance practices for high-pressure pipelines located near Residential Dwellings compared to those located in non-residential agricultural settings.

E. Constructability, Schedule, and Costs

(Exhibit D – Proposed Project; Exhibit E – Project Costs and Economics)

D DK-12

Reference: Exhibit D (Proposed Project), construction methodology and schedule.

Please explain whether routing the pipeline across open agricultural lands would materially affect construction complexity, traffic control requirements, or the September 1, 2027 in-service date.

E DK-13

Reference: Exhibit E (Project Costs and Economics).

Please identify any incremental costs Enbridge Gas estimates would be associated with an Alternative Agricultural Route compared to the Preferred Route, and identify the principal cost drivers.

F. Land Matters and Municipal Road Allowance Use

(Exhibit G – Land Matters; Exhibit A – Application)

G DK-14

Reference: Exhibit G (Land Matters).

Please confirm whether Enbridge Gas is able to construct the proposed pipeline using private easements outside municipal road allowances where a willing landowner offers an easement corridor.

A DK-15

Reference: Exhibit A (Application), discussion of municipal approvals and franchise agreements.

Please explain whether Enbridge Gas considers routing within municipal road allowances to be mandatory under the Township of St. Clair franchise agreement, or whether alternative routing outside the road allowance is permitted.

Filed at Brigden, Ontario Feb 17th 2026

A handwritten signature in blue ink, appearing to read 'D Kabbes', with a stylized, cursive script.

Don Kabbes

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