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BY EMAIL

March 2, 2026

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

Dear Ritchie Murray:

**Re: Enbridge Gas Inc.
Application for Approval to Renew its Franchise Agreement with the Regional
Municipality of Waterloo
OEB File Number: EB-2025-0327**

In accordance with Procedural Order No. 1, please find attached Ontario Energy Board (OEB) staff's interrogatories in the above proceeding. The applicant and intervenor have been copied on this filing. Enbridge Gas's responses to interrogatories are due by March 9, 2025.

Any questions relating to this letter should be directed to Cecilia Wang at Cecilia.Wang@oeb.ca or at 437-880-4366. The OEB's toll-free number is 1-888-632-6273.

Yours truly,

Cecilia Wang
Analyst

Encl.

**OEB Staff Interrogatories
Enbridge Gas Inc.
EB-2025-0327**

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

OEB STAFF - 1

Reference: Application, page 2, para 9

Preamble:

In its application, Enbridge Gas Inc. (Enbridge Gas) outlines several amendments sought by the Regional Municipality of Waterloo (the Region) regarding the terms and conditions in the Model Franchise Agreement.

Specifically, the Region seeks to include a requirement for Regional staff to be provided with as-built CAD drawings in the UTM NAD83 Zone 17 co-ordinate system. The Region also seeks to expand the definition of "highway" to ensure that all parts of the right of way are captured.

Question(s):

- a) Please comment on how expanding the definition of "highway" beyond the current standard language in the Model Franchise Agreement may impact or change the terms and conditions in the Model Franchise Agreement.
- b) Please describe the current process by which Enbridge Gas satisfies the requirements of Paragraph 6 of the Model Franchise Agreement regarding the provision of as-built drawings to the Region's Engineer or Road Superintendent.
- c) Please clarify whether Enbridge Gas currently provides digital as-built drawings to any other Ontario municipalities upon request.

OEB STAFF - 2

Reference: Application, page 3, para 14-16
Application, Schedule F
Regional Municipality of Waterloo, Intervention Form, Issues

Preamble:

The Region states that it does not agree with Enbridge Gas's position that section 15 of the Model Franchise Agreement gives Enbridge unfettered discretion regarding the removal of pipelines. Enbridge Gas maintains that it has the discretion not to remove the existing pipelines in accordance with section 15(b) of the Model Franchise Agreement. Enbridge Gas has determined that, to date, there is no operational reason to remove its decommissioned pipelines.

Questions(s):

- a) Please discuss the frequency with which Enbridge Gas's decommissioned pipelines have conflicted with new municipal infrastructure in the Region since 2006. For the projects identified, please provide Enbridge Gas's estimates of the cost difference between physically removing and relocating those pipes versus abandoning them in place.
- b) Please discuss whether the costs associated with the physical removal of decommissioned pipes, if mandated specifically by the Region, would be recovered solely from the Region's ratepayers or across all ratepayers in Enbridge Gas's service territory.
- c) Please describe whether the total number of instances where Enbridge Gas has elected to relocate a decommissioned pipe under Paragraph 15(b) in response to a municipal request in the Region since 2006, is higher than what is typical in other municipalities in Ontario where Enbridge serves customers.
- d) Please explain how Enbridge Gas typically manages the interaction of natural gas infrastructure and underground assets and whether there is a local "Utility Co-ordinating Committee" or similar group or body in the Region whereby the owners and operators of underground assets and unique linear property assemble to discuss common issues in the Region.

OEB STAFF – 3

Reference: Application, page 2, para 9
Regional Municipality of Waterloo, Intervention Form, Issues

Preamble:

The Region requests to change the date in section 18 of the Model Franchise Agreement. The Region states that this date should be updated proportionally by 20 years for the new Municipal Franchise Agreement to preserve the original intent of section 18 of having Enbridge be 100% responsible for removal/replacement costs of infrastructure that has surpassed its useful life.

Question(s):

- a) Please provide an age profile of Enbridge Gas's current gas system within the Region and compare it to the age profile of Enbridge Gas's systems in other typical Ontario municipalities.
- b) Please provide a breakdown of the percentage of Enbridge's current gas system in the Region that was installed prior to January 1, 1981, versus the percentage installed after that date. Please compare these percentages to those of other typical Ontario municipalities served by Enbridge Gas.