

EB-2025-0327

Regional Municipality of Waterloo Franchise Agreement Interrogatories of Environmental Defence

Interrogatory #ED-1

Reference: EGI Application, Schedule D

Preamble: The following questions are raised in relation to the Motion passed by Council of the Regional Municipality of Waterloo, on November 19, 2025, which stated:

That the Regional Municipality of Waterloo authorize Regional staff to negotiate with Enbridge Gas Inc. the following changes to the draft 2000 Model Franchise Agreement (MFA) between the Region of Waterloo and Enbridge Gas Inc.:

Expand the definition of “highway” to ensure that all parts of the right of way are captured;

Include a requirement for Regional staff to be provided with as-built CAD drawings in UTM NAD83 Zone 17 co-ordinate system in s. 6 of the MFA;

Add clarification regarding the use of the words “remove”, “relocate”, and “decommission” in such sections s. 12 and 15 of the MFA;

Add clarification regarding the interaction between s. 12 and 15 regarding cost sharing responsibilities;

Allow the Region of Waterloo to charge for-profit entities such as Enbridge fees for use of public property if Ontario Regulation 584/06 under the Municipal Act 8667 is amended to allow for such charging of fees;

Add clarification that “project engineering and project administrative costs” listed in s. 12(c)(v) are limited to actual cost incurred;

Change the date in s.18 for when a request for infrastructure owned by Enbridge needs to be removed/replaced triggers Enbridge being 100% responsible for all such costs.

Question(s):

- (a) For each of the proposed changes noted above, please explain Enbridge’s position. Please separately set out Enbridge’s position on each item.

Interrogatory #ED-2

Reference: Proposed agreement

Question(s):

- (a) Please provide a copy of all correspondence with the Regional Municipality of Waterloo regarding the franchise agreement.
- (b) Please provide any notes or minutes from any meetings with the Regional Municipality of Waterloo regarding the franchise agreement.
- (c) Please provide a list of all meetings with the Regional Municipality.

Interrogatory #ED-3

Reference: EGI Application

Preamble: These questions explore whether deviations from the model franchise agreement regarding the allocation of costs of pipeline relocations may be warranted. This includes whether there are material differences in the quantum of said costs paid in Waterloo Region versus provincial averages.

Question(s):

- (a) Please provide a list of all payments, including amounts made from the Regional Municipality of Waterloo to Enbridge to relocate gas pipelines that conflict with municipal works, and a total of all payments, over the term of the existing franchise agreement.
- (b) Please provide a list of all payments made from parties other than the Regional Municipality of Waterloo to Enbridge to relocate gas pipelines within the Regional Municipality of Waterloo that conflict with other works, and a total of all payments, over the term of the existing franchise agreement.
- (c) Please provide a comparison of the quantum of said charges with those in other municipalities served by Enbridge, on average. Please provide that comparison in terms allowing for apple-to-apple comparisons, such as total payments per capita or total payments per km of pipelines in the subject area.
- (d) Please provide the amount of annual total payments made by municipalities to Enbridge to relocate gas pipelines that conflict with other works in Ontario for the most recent five-year period.
- (e) Please provide the amount of annual total payments made by other parties to Enbridge to relocate gas pipelines that conflict with other works in Ontario for the most recent five-year period.
- (f) How many kms of pipelines does Enbridge own in (i) the Regional Municipality's rights of way and (ii) all of Ontario.

Interrogatory #ED-4

Reference: Proposed agreement

Question(s):

- (a) In its pre-filed evidence in this proceeding, and in evidence in the Guelph proceeding, Enbridge provided evidence regarding the property taxes it paid in each municipality. Please explain the relevance of this information.
- (b) For the most recent year, please provide details of the municipal taxes paid to the Regional Municipality of Waterloo, including the value of the property on which those taxes were paid, a breakdown of the property by address, type (e.g. pipelines vs. buildings), size and value, and the rates paid.
- (c) Does Enbridge agree that there is a difference between property taxes and the payment of fees to use public lands? Please explain the answer.
- (d) Please provide a breakdown of the facilities it owns that are covered by the Waterloo Region MFA, including the kilometers of pipelines and the square meters of above-ground infrastructure.

Interrogatory #ED-5

Reference: Proposed agreement

Question(s):

- (a) How many metres of pipelines does Enbridge have in the Regional Municipality of Waterloo that are NOT located on a municipal highway but are located on Regional Municipality of Waterloo property (excluding the service lines directly serving Regional Municipality of Waterloo buildings)?
- (b) How many metres of pipelines does Enbridge have in the Regional Municipality of Waterloo that are NOT located on a municipal highway but are located on private property (excluding the service lines directly serving individual customers)?
- (c) What land-based fees does Enbridge pay for (a) and (b)?
- (d) Does Enbridge ever pay landowners to put pipelines under their property? If yes, please provide the approximate range that Enbridge pays per metre, including the average, the highest, and the lowest price paid.
- (e) What, if any, infrastructure other than pipelines, does Enbridge have under municipal and privately-owned property in the Regional Municipality of Waterloo? For each, please list their use and size.

Interrogatory #ED-6

Reference: EGI Application, paras. 11-12

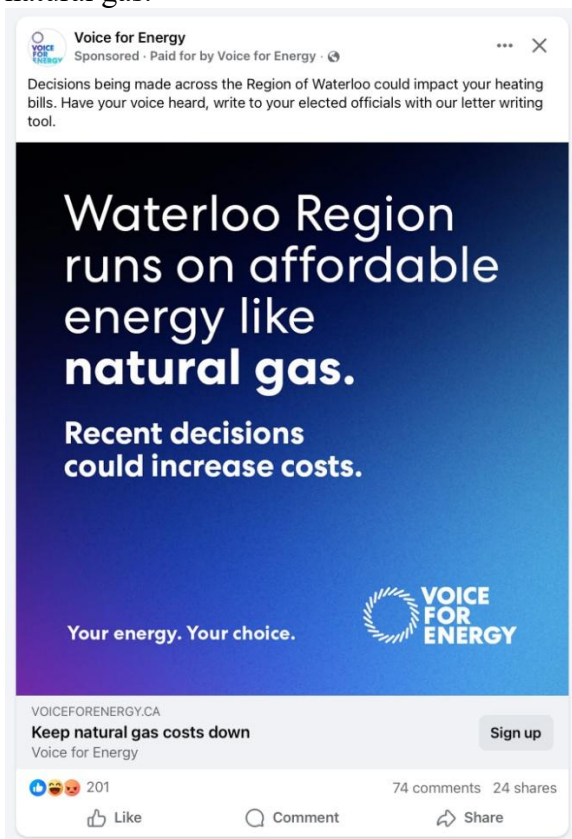
Question(s):

- (a) Please provide a list of all municipal franchise agreement entered into since December 1, 2024 that have any wording that differs from the Model Franchise Agreement. Please include a column showing the difference in redline.

Interrogatory #ED-7

Reference:

In February 2026, Waterloo Region residents received sponsored messaging via social media platforms from an organization called “Voice for Energy” (see below). The advertising stated that “Decisions being made across the Region of Waterloo could impact your heating bills. Have your voice heard, write to your elected officials with our letter writing tool.” It also stated, “Waterloo Region runs on affordable energy like natural gas.”



Question(s):

- (a) Was Enbridge Gas Inc. directly or indirectly involved in the financing, development and/or distribution of this marketing campaign?
- (b) Please share all information within Enbridge's knowledge regarding the organizational makeup and financing of Voice for Energy.
- (c) What, if any further public communications activities are planned in Waterloo Region (online or otherwise) by Voice for Energy or Enbridge Gas Inc. in the next 12 months?
- (d) How much has Enbridge paid to Voices for Energy in this fiscal year and in each of the past 3 years?
- (e) Please provide all communications between Enbridge and Voices for Energy regarding the social media campaigns it ran in conjunction with the proceedings relating to the Guelph Franchise Agreement and the Waterloo Region Franchise Agreement.

Interrogatory #ED-8

Reference: EGI Application

Preamble: These questions explore whether deviations from the model franchise agreement regarding the allocation of costs of pipeline relocations or free use of public lands may be warranted.

Question(s):

- (a) Please provide an estimate of the gas consumed in Waterloo Region annually and the GHG emissions arising therefrom.
- (b) Please provide an estimate of the gas consumed in Ontario and the GHG emissions arising therefrom.
- (c) Please express and compare the response to (a) and (b) in per-capita terms and, if possible, as a percentage of total emissions in the relevant area.
- (d) Please

Interrogatory #ED-9

Reference: EGI Application

Question(s):

- (a) Please provide a copy of (or link to) the Municipal Franchise Agreements for each of the lower tier municipalities within Waterloo Region.
- (b) Please provide a copy of (or link to) all CPCNs within Waterloo Region.
- (c) Please provide map showing the existing pipelines within Waterloo Region, colour coded to indicate which franchise agreement they are covered by (i.e. the Waterloo Region agreement or one of the agreements with one of the lower-tier agreements).

Interrogatory #ED-10

Reference: EGI Application

Question(s):

- (a) Please provide a copy of (or link to) all Municipal Franchise Agreements that deviate from the model agreement.
- (b) Please provide table listing each deviation and an explanation for why the deviation is justified. This is intended to help us explore Enbridge's position on when deviations are justified.