



Ontario
Energy
Board | Commission
de l'énergie
de l'Ontario

BY EMAIL

March 5, 2026

Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Dear Ritchie Murray:

**Re: Enbridge Gas Inc.
Lanark and Balderson Community Expansion Project
OEB File Number: EB-2025-0306**

In accordance with Procedural Order No. 1, please find attached the Ontario Energy Board (OEB) staff questions in the above proceeding. The applicant and intervenors have been copied on this filing.

Any questions relating to this letter should be directed to Natalya Plummer at natalya.plummer@oeb.ca or at 416-440-7654. The OEB's toll-free number is 1-888-632-6273.

Yours truly,

Natalya Plummer
Advisor, Major Applications

Encl.

OEB Staff Interrogatories Enbridge Gas Inc. EB-2025-0306

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*.

ISSUE 1.0 NEED FOR THE PROJECT

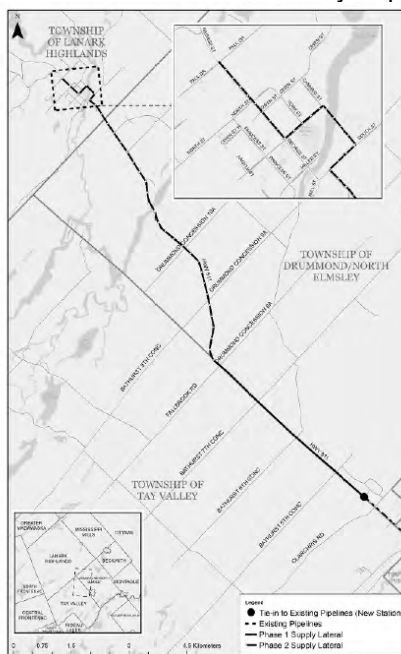
OEB STAFF-1

Reference: Exhibit A, Tab 2, Schedule 1, Page 2
Exhibit A, Tab 2, Schedule 1, Attachment 1, Page 1

Preamble:

Enbridge Gas states that the Project will be completed in two Phases. Phase 1 is planned to commence in April 2027 and be placed into service by December 2027. Phase 2 is planned to commence in October 2027 and be placed in service by December 2028. Enbridge Gas provided the following map of the Project.

Figure 1: Lanark and Balderson Community Expansion Project



Question(s):

- a) Please explain why Enbridge Gas proposed to construct the project in two phases with separate proposed construction starts and in-service dates. Please explain why the proposed pipelines in Phase 1 and Phase 2 could not be constructed simultaneously to achieve one in-service date for the Project.
- b) Please provide an updated map that more clearly delineates phase 1 and phase 2 of the Project.

OEB STAFF-2

Reference: Exhibit B, Tab 1, Schedule 1, Pages 3 to 6
Exhibit G, Tab 1, Schedule 1, Page 1, Footnote 1

Preamble:

Enbridge Gas states that the Project will make natural gas available to the communities of Lanark and Balderson and surrounding areas in the Township of Lanark Highlands and Township of Drummond/North Elmsley. Enbridge Gas notes that a portion of distribution pipeline will be located in the Township of Tay Valley.

Enbridge Gas conducted surveys of potential residential customers to gauge interest in natural gas distribution service and conversion within the Project area. Enbridge Gas retained Forum Research, a third-party research supplier, to conduct surveys by telephone, online and in-person of potential residential customers in the Project area between June 3 and June 19, 2023. A total of 121 surveys were completed from a list of 297 homeowners. The level of completes represents a 41% response rate.

Question(s):

- a) Please discuss whether surveys were conducted in the Township in Tay Valley.
- b) Please provide the following:
 - i. Number of projected customers in the Township of Lanark Highlands
 - ii. Number of projected customers in the Township of Township of Drummond/North Elmsley
 - iii. If applicable, number of projected customers in the Township of Tay Valley

- c) Please compare the response rate for the Lanark and Balderson Community Expansion Project to response rates in recent market surveys for other Enbridge Gas Phase II community expansion projects.
- d) Since the completion of the market research survey in June 2023, please explain whether Enbridge Gas has obtained any additional information on the interest for switching to natural gas service as part of this community expansion project? Please provide any additional information.

OEB STAFF-3

Reference: Exhibit B, Tab 1, Schedule 1, Page 6
Exhibit E, Tab 1, Schedule 1, Page 2

Preamble:

The Lanark and Balderson Community Expansion Project is proposed to go into service in two stages between December 2027 and December 2028. The table below shows annual forecasted attachments over ten years. Enbridge Gas forecasted 286 customer attachments by the tenth year of the project.

Enbridge Gas states there has been a decrease in the forecasted customer attachments from its original application as result of field investigations that identified constructability constraints in specific areas.

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)	51	88	53	24	23	4	4	4	2	2	255
Commercial (small, medium, large) / institutional / agricultural	7	11	8	3							29
Industrial	1	1									2
Total	59	100	61	27	23	4	4	4	2	2	286

Question(s):

- a) Please discuss the method and data Enbridge Gas used to forecast 286 residential attachments in the communities of Lanark and Balderson over ten years.

- b) What is the assumed capture rate of the forecast attachments by the end of the tenth year?
- c) Please discuss any anticipated potential delays that may affect the construction schedule for the Project or achieving the forecast number of customer attachments in the first and second year.
- d) Please describe in detail Enbridge Gas's outreach activities, plans and/or programs to ensure that the customer attachments will be realized as forecasted.
- e) Please comment on differences in forecasted number of customer attachments Enbridge Gas provided in the project proposal approved for funding in Phase 2 of the NGEF process and the Project subject to this application.
- f) Please provide a comparison of the actual customer attachments relative to the LTC forecasted customer attachments to date for all of Enbridge Gas's Phase 2 NGEF supported community expansion projects that are already in service.

ISSUE 3.0 PROJECT COST & ECONOMICS

OEB STAFF-4

Reference: Exhibit E, Tab 1, Schedule 1

Preamble:

Enbridge Gas states that the Project has a total estimated cost of \$18.6 million. A total of \$12.3 million of the total cost is attributed to pipeline facilities and a total of \$6.3 million is attributed to ancillary facilities. Enbridge Gas is not seeking leave to construct for the ancillary facilities.

Enbridge Gas notes that there is a \$592,852 variance from the total cost included in its original application which is mainly due to a decrease in the forecasted pipe lengths and a decrease in forecasted customer attachments as a result of field investigations that identified constructability constraints in specific areas.

The table below provides a breakdown of the Project's total estimated cost.

Table 1: Total Estimated Project Costs (\$CAD)

Item No.	Description	Pipeline Costs	Ancillary Costs ¹	Total Costs
1	Material	410,350	410,123	820,473
2	Construction	7,341,085	4,731,346	12,072,431
3	Outside Services	2,555,838	261,442	2,817,280
4	Land, Permits, Approvals and Consultations	2,239	1,119	3,358
5	Contingency	1,553,005	877,293	2,430,298
6	Sub-Total	11,862,518	6,281,323	18,143,841
7	Interest During Construction	459,362	3,791	463,153
8	Total Project Cost	12,321,880	6,285,114	18,606,994
9	Original Proposed Cost			19,199,846
10	Variance (8-9)			(592,852)

Question(s):

- a) Please provide a comparison of the estimated projects costs relative to at least three recent and comparable projects.
- b) Please confirm that the Outside Services in the table above is pipeline consulting and professional service costs.

ISSUE 4.0 ENVIRONMENTAL IMPACTS

OEB STAFF-5

Reference: Exhibit F, Tab 1, Schedule 1

Preamble:

Enbridge Gas circulated the environmental report to the Ontario Pipeline Coordinating Committee (OPCC) on July 9, 2025. A summary of comments from the OPCC is included as appendix A.6 of the environmental report. Enbridge Gas states that the

Technical Standards and Safety Authority (TSSA) has yet to provide their review of the project.

Enbridge Gas states that a Stage 1 Archaeological Assessment (AA) was completed by Stantec on April 24, 2025 and that a Stage 2 AA of the areas that retain archaeological potential along the preferred route was scheduled to be undertaken in Q4 2025.

Enbridge Gas states a Cultural Heritage Assessment Report: Existing Conditions and Preliminary Impact Assessment (CHECPIA) will be completed on the selected preferred route.

Question(s):

- a) Please update the consultation log and correspondence with any new OPCC comments since the application was filed.
- b) Please provide an update on the status of the CHECPIA report.
- c) Please provide an update on the Stage 2 AA.
- d) Please provide an update on the status of the TSSA's review of the Project.

ISSUE 5.0 ROUTE MAP AND FORM OF LANDOWNER AGREEMENTS

OEB STAFF-6

Reference: Exhibit G, Tab 1, Schedule 1

Preamble:

Enbridge Gas states that temporary working areas may be required along the preferred route where the road allowance is too narrow or confined to facilitate construction and that temporary working rights will be negotiated where required.

Question(s):

- a) Please discuss any expected delays with respect to obtaining the required land rights for the project and its impact to the construction starts and in-service dates.
- b) Please provide an update on the status and prospect of remaining land negotiations where permanent and temporary easements are required.

ISSUE 6.0 INDIGENOUS CONSULTATION

OEB STAFF-7

Reference: Exhibit H, Tab 1, Schedule 1, Attachments 2, 6 and 7

Preamble:

The Ministry of Energy and Mines has identified six Indigenous communities as potentially impacted by the project:

- Alderville First Nation
- Algonquins of Ontario
- Algonquins of Pikwàkanagàn
- Curve Lake First Nation
- Hiawatha First Nation
- Mississaugas of Scugog Island First Nation

The environmental report was circulated to Indigenous communities on July 9, 2025. An Indigenous consultation log is included in the application.

The consultation log notes that the Algonquins of Ontario had questions regarding the archaeology monitoring work, including the meeting location, field director's name and contact number, PPE requirements, location map, duration of Project, Project stage, and health and safety sign in sheets and that Enbridge Gas was working to provide the information.

Question(s):

- a) Please provide an updated Indigenous consultation log with any correspondence from the Ministry of Energy and Mines on Enbridge Gas's consultation activities. Please also indicate when Enbridge Gas expects to receive a letter of opinion from the Ministry of Energy and Mines.
- b) Please discuss whether the information requested by the Algonquins of Ontario has been provided.
- c) Please discuss any outstanding concerns raised after the application was filed and how Enbridge Gas is addressing these concerns.
- d) Please describe Enbridge Gas' plans for continuing engagement with the six Indigenous communities. Which channels of communication will be used and

which information regarding the project construction, operation or any other aspect of the project will be conveyed.

ISSUE 7:0: CONDITIONS OF APPROVAL

OEB STAFF-8

Reference: Exhibit I, Tab 1, Schedule 1

Preamble:

Enbridge has applied for leave to construct facilities under section 90(1) of the OEB Act.

The OEB's standard conditions of approval for section 90 applications are provided below.

- a) Please comment on the standard conditions of approval. If Enbridge does not agree with any of the standard conditions of approval, please identify the specific conditions that Enbridge disagrees with. Please specify any proposed changes, amendments or additional conditions to the standard conditions. Explain the rationale for any proposed changes or amendments.

**Leave to Construct Application
under Section 90 of the OEB Act**

**Enbridge Inc.
EB-2025-0306
DRAFT
Standard Conditions of Approval**

1. Enbridge Gas Inc. shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in EB-2025-0306 and these Conditions of Approval.
2. (a) Authorization for leave to construct shall terminate 12 months after the decision is issued unless construction has commenced prior to that date.

(b) Enbridge Gas Inc. shall give the OEB notice in writing:
 - i. of the commencement of construction, at least 10 days prior to the date construction commences
 - ii. of the planned in-service start date, at least 10 days prior to the date the facilities begin to go into service
 - iii. of the date on which construction was completed, no later than 10 days following the completion of construction
 - iv. of the full project in-service date, no later than 10 days after all the facilities go into service
3. Enbridge Gas Inc. shall obtain all necessary approvals, permits, licences, certificates, agreements and rights required to construct, operate and maintain the Project.
4. Enbridge Gas Inc. shall implement all the recommendations of the Environmental Report filed in the proceeding, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.
5. Enbridge Gas Inc. shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Enbridge Gas Inc. shall not make any such change without prior notice to and written approval of the OEB. In the event of an emergency, the OEB shall be informed immediately after the fact.
6. Concurrent with the final monitoring report referred to in Condition 7(b), Enbridge Gas shall file a Post Construction Financial Report, which shall provide a variance analysis of project cost, schedule and scope compared to the estimates

filed in this proceeding, including the extent to which the project contingency was utilized. Enbridge Gas shall also file a copy of the Post Construction Financial Report in the proceeding where the actual capital costs of the project are proposed to be included in rate base or any proceeding where Enbridge Gas proposes to start collecting revenues associated with the Project, whichever is earlier.

7. Both during and after construction, Enbridge Gas Inc. shall monitor the impacts of construction, and shall file with the OEB one electronic (searchable PDF) version of each of the following reports:

(a) A post construction report, within three months of the full project in-service date, which shall:

- i. provide a certification, by a senior executive of the company, of Enbridge Gas Inc.'s adherence to Condition 1
- ii. describe any impacts and outstanding concerns identified during construction
- iii. describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction
- iv. include a log of all complaints received by Enbridge Gas Inc., including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions
- v. provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licenses, and certificates required to construct, operate, and maintain the proposed project

(b) A final monitoring report, no later than fifteen months after the full project in-service date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:

- i. provide a certification, by a senior executive of the company, of Enbridge Gas Inc.'s adherence to Condition 4
- ii. describe the condition of any rehabilitated land
- iii. describe the effectiveness of any actions taken to prevent or mitigate any identified impacts of construction
- iv. include the results of analyses and monitoring programs and any recommendations arising therefrom
- v. include a log of all complaints received by Enbridge Gas Inc., including the date/time the complaint was received; a description of the complaint; any actions taken to address the complaint; and the rationale for taking such actions

8. Enbridge Gas Inc. shall designate one of their employees as project manager who will be the point of contact for these conditions, and shall provide the employee's name and contact information to the OEB and to all affected landowners, and shall clearly post the project manager's contact information in a prominent place at the construction site.