

Enbridge Gas Inc.(EGI)

**Application for Renewal of Franchise Agreement and CPCN
Town of Cobourg (Cobourg)**

Town of Cobourg Interrogatories

Cobourg.1

References: Application Schedule H, *2000 Model Franchise Agreement* (MFA), paragraph 4.(b).

OEB Letter dated October 15, 2025, regarding 2026 *Generic Proceeding Regarding the Model Franchise Agreement*.

Preamble: The MFA includes provision for amendment of the agreement with Cobourg in the event that the MFA is changed, such amendment to be effective only at the 7th or 14th anniversaries of the date of "*final passing of the By-law*" passed by Municipal Council authorizing execution of the agreement.

The OEB has issued a letter indicating an intention to review the MFA in 2026.

Question:

In light of the imminent review of the MFA, would EGI have a concern if its renewed franchise agreement with Cobourg included a provision allowing for amendment to incorporate any revisions to the MFA in the year following the effective MFA revision date? If so, please explain the concern.

Cobourg.2

References: Application Schedule H, *2000 Model Franchise Agreement* (MFA), paragraph 5.(e). regarding work scheduling.

Gas Franchise Handbook (Handbook), page 4 referencing a municipal Public Utilities Coordinating Committee (PUCC).

MFA, paragraphs 12(c) and (d) regarding cost sharing for relocations.

Handbook, page 15 regarding pipeline relocation and maintenance of the gas system.

Handbook, page 18 regarding location of the gas system for others.

EGI Application for Franchise Renewal for Town of Cobourg
Town of Cobourg Interrogatories

Preamble: The first two references appear to Cobourg to be the only provisions in the MFA or Handbook which address co-ordination between a municipality and EGI regarding major works. The first is a requirement for municipal approval. The second specifically references pipeline location standards.

Cobourg's municipal infrastructure is old and requires revitalization which will entail significant expense and public disruption. For example, in 2026 Cobourg plans replacement of the main downtown road and proximal watermain and of the sanitary and storm sewer. The anticipated final grade of the new road will require relocation of existing EGI infrastructure. Cobourg has experienced delays as a result of requiring estimates from, and co-ordinating work scheduling with, EGI in order to progress this project.

Questions:

- a. Does EGI have a policy or process regarding response to municipal inquiries for relocation work (e.g. timelines to provide requested information including design drawings, cost estimates and contractor scheduling)? If so, please explain and provide any associated written materials.
- b. The MFA (third reference above) provides for cost sharing between the municipality and EGI for relocation work by EGI requested by the municipality.
 - i. Please confirm that if EGI needs to repair or replace its infrastructure outside of a request for relocation from the municipality, EGI is responsible for all associated costs.
 - ii. Does EGI have a mechanism for proactive repair or replacement of aging EGI infrastructure in proximity to a municipal infrastructure project in instances where EGI's infrastructure is not relocated but is unearthed in the course of the municipalities' work and then recovered by the Municipality?
 - iii. In instances where EGI receives a request from a municipality for relocation of EGI infrastructure that does, or will imminently, require repair or replacement, what cost sharing policy is applied?
- c. Given the apparent lack of a framework in the MFA and Handbook for joint infrastructure renewal planning, does EGI have a policy or process to address such opportunities? For example, is there a mechanism that EGI uses to proactively engage with municipalities as EGI's infrastructure ages to determine whether the municipality anticipates significant infrastructure work or renewal in areas proximal to EGI infrastructure that will, in the near

EGI Application for Franchise Renewal for Town of Cobourg
Town of Cobourg Interrogatories

term, require reinforcement or replacement? If so, please explain and provide any associated written materials.

- d. Please provide EGI's view on a condition of approval of its Application that EGI review its infrastructure in the franchise area and discuss with Cobourg any opportunities to coordinate near term EGI infrastructure work with near term Cobourg infrastructure work.