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March 31, 2026

VIA RESS AND EMAIL

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Ritchie Murray:

Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File: EB-2025-0323
Merrickville-Wolford Community Expansion Project
Enbridge Gas's Responses to Algonquins of Ontario (AOO) Letter of Comment

On March 5, 2026, Algonquins of Ontario filed a Letter of Comment with the OEB in the above referenced proceeding.

Enclosed is Enbridge Gas's responses to Algonquins of Ontario's Letter of Comment.

If you have any questions, please contact the undersigned.

Sincerely,

Olatunbosun Ishola

Olatunbosun Ishola
Advisor, Regulatory Applications – Leave to Construct

Enbridge Gas Inc. (Enbridge Gas)
Merrickville-Wolford Community Expansion Project
Enbridge Gas' Responses to Algonquins of Ontario (AOO) Comments received March 5, 2026

Item	AOO Comment	Enbridge Gas Response
Fisheries Assessment – Methodology	The fisheries assessment for the Project relies primarily on a desktop review and limited windshield field visits conducted in August 2023 and August 2024. While these site visits provide general context on aquatic conditions, they were completed outside of key fish spawning and early life-stage periods and are insufficient to fully characterize fish habitat function and seasonal use, particularly for sensitive life stages.	The Project has taken into account the information collected and has taken a conservative approach to the design and schedule for the Project to avoid direct impacts to fish and fish habitat within the Rideau River. The proposed trenchless crossing method, horizontal directional drilling (HDD), eliminates the need for in-water work and avoids disturbance to the riverbed, banks, and shoreline, consistent with applicable federal and provincial guidance. If and when the Project is approved, drilling activities are expected to occur in the fall of 2026 for approximately 3 weeks. Given that there will be no construction in the spring or summer, there is no need to conduct additional fish surveys for this time period. The Rideau River at the Project crossing has been identified as a warmwater fishery and fisheries timing windows have been established in consultation with Parks Canada. The planned drilling timeline will avoid: (i) drilling activities between January 1 and June 30 in accordance with Parks Canada's Pre-Approved Routine Impact Assessment; and (ii) an additional period that you have indicated could potentially impact the development of juvenile species.

	Given the ecological significance, size, and connectivity of the Rideau River and associated watercourses, additional field verification is important to confirm fish habitat presence, function, and seasonal use. Fisheries surveys should be conducted during the spring months (April to early July) to adequately characterize spawning and early life-stage habitat and to confirm the absence of any aquatic Species at Risk (SAR). These surveys would help confirm the desktop assessment and identify any sensitive spawning or juvenile rearing areas that may be present.	For the reasons noted above, Enbridge Gas does not believe additional field verification is required. The presence of warmwater fish species within the Rideau River has been identified through publicly available sources; therefore, HDD drilling activities for the river crossing, anticipated to occur in fall 2026 and lasting approximately three weeks, will be scheduled outside of sensitive spawning and early life stage periods. This will minimize potential impacts to fish and fish habitat during critical life stages while ensuring compliance with applicable regulatory guidance.
Noise and Vibration Effects	While anticipated construction noise and vibration levels associated with horizontal directional drilling (HDD) are not expected to result in direct injury to adult fish, there is potential for sub-lethal effects (e.g. disruption of spawning behavior, egg development, and juvenile survival). Although the proposed construction window extends from June 30 to December 31, the absence of spring and early summer field investigations creates uncertainty regarding fish breeding activity within the project area. As such, it is difficult to confidently support	The Rideau River at the Project crossing has been assessed as a warmwater fishery, and the applicable fisheries timing restriction for this reach has been established through Parks Canada's Pre-Approved Routine Impact Assessment process. Consistent with this approved timing restriction, HDD is not proposed within the Rideau River from Ottawa to Old Slys, or within Upper Rideau Lake, funtil the fall. This restriction is intended to avoid construction during sensitive fish spawning and early life-stage periods within this waterbody segment. Accordingly, Project HDD activities will commence only after the restricted period established by Parks Canada has ended, Drilling operation is expected to last approximately three weeks. HDD would be implemented with applicable watercourse crossing

	construction noise and vibration prior to late August without a clearer understanding of seasonal fish use. In the absence of this information, a fisheries-specific mitigation plan should be developed and implemented.	mitigation measures. As a result, adverse effects on fish, including effects related to construction noise and vibration, are mitigated. To further reduce the potential for effects, HDD activities would be carried out from upland work areas, with measures in place to prevent and respond to any inadvertent drilling fluid release, and with all site-specific mitigation required by the Project permits and approvals.
HDD Monitoring and Contingency Planning	While HDD generally poses a low risk of inadvertent drilling fluid releases, and the Environmental Report describes a general monitoring approach during construction, a detailed monitoring and contingency plan specific to fisheries protection has not been provided. In the event of a drilling fluid release, there is no clearly defined fisheries focused response plan to prevent or minimize impacts to fish and fish habitat.	A project specific Inadvertent Contingency Release Plan will be implemented to address any inadvertent releases during drilling operations. Specific mitigation measures for fish and fish habitat have been incorporated into the plan, based on guidance obtained from DFO to protect fish and fish habitat during drilling activities.
Cumulative effects	Cumulative effects are referenced in the Environmental Report; however, these effects are not assessed specifically in relation to fish or fish habitat. Given the ecological importance of the project area, additional consideration of cumulative impacts to aquatic ecosystems would strengthen the assessment.	Thank you for your comment. The construction methods and mitigation measures outlined in the ER were developed to protect fish and fish habitat; accordingly, the project is not anticipated to result in direct or indirect impacts to fish or fish habitat, and no project-related effect pathway to aquatic resources has been identified. A review of the current and reasonably foreseeable projects in the study area did not identify any other projects with the potential to affect aquatic resources in the study

		area. As such, the conditions that would typically warrant a cumulative effects assessment for aquatic ecosystems are not present at this time. Enbridge Gas recognizes the ecological importance of aquatic resources and remains committed to undertaking the environmental mitigations outlined in the ER throughout the project lifecycle. Should new information emerge regarding other projects or changes to site conditions that could affect aquatic resources, cumulative effects considerations would be revisited accordingly.
Benthic communities	The report also does not appear to address potential impacts to benthic communities. While HDD typically minimizes direct disturbance to the riverbed, there remains potential for sediment disturbance or increased turbidity in the event of an inadvertent release or sediment mobilization. Benthic invertebrates represent an important food source for many juvenile and adult fish species, and disturbance to these communities could indirectly affect fish populations and habitat function. Consideration of potential effects on benthic communities, and any associated	An Inadvertent Contingency Release Plan will be implemented to manage any inadvertent releases during drilling operations. Continuous monitoring of drilling activities will be conducted to ensure that any loss of drilling fluid or the observation of turbidity plumes is promptly identified, allowing for the prompt shutdown of drilling operations if required. Specific mitigation measures for HDD, as outlined by Parks Canada and DFO, will be followed to minimize potential impacts to benthic communities and aquatic habitat.

	mitigation measures, would help provide a more comprehensive assessment of potential aquatic impacts.	