

Friday, April 17, 2026

**Ontario Energy Board**P.O. Box 2319  
2300 Yonge Street, 27th Floor  
Toronto ON M4P 1E4  
Attn: Registrar  
Dear Ms. Serrao**Re: EB-2026-0009  
Generic Proceeding to Review the Model Franchise Agreement  
Letter of Comment**

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I represent the City of St. Catharines with respect to this matter. I am submitting this letter of comment on behalf of the City of St. Catharines for consideration by the panel deciding the application.

Section 12 Pipeline Relocation of the Model Franchise Agreement should be amended such that the municipality is not responsible for cost sharing for relocation where a gas main is constructed and installed improperly, particularly where a gas main is installed at an improper depth and is too shallow.

Where the municipality is reconstructing a road, it may end up lowering the road to a small extent. An existing gas main may be installed at an improper depth, and it may be located just under the asphalt at a depth that is too shallow. If the gas main must be replaced as a result, the municipality should not be obligated to cost share for the replacement.

If you have any questions or concerns with respect to this letter, please feel free to contact the undersigned.

Sincerely,

*Robert Di Lallo*

**Robert Di Lallo**  
Assistant City Solicitor II  
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