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BY EMAIL

April 28, 2026

Ritch Murray
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Registrar@oeb.ca

Dear Ritch Murray:

**Re: Ontario Energy Board (OEB) Staff Submission
Enbridge Gas Inc. (Enbridge Gas)
Waubuno Gathering System and Compressor Replacement Project
OEB File Number: EB-2025-0307**

In accordance with OEB's Procedural Order No. 2, please find attached OEB staff's submission in the above proceeding. The attached document has been forwarded to Enbridge Gas Inc. and to all other registered parties to this proceeding.

Yours truly,

Randy Doradat
Advisor, Natural Gas

Encl.

c: All parties in EB-2025-0307



ONTARIO ENERGY BOARD

OEB Staff Submission

Enbridge Gas Inc.

Waubuno Gathering System and

Compressor Replacement

Project

EB-2025-0307

April 28, 2026

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Application Summary and Process

Enbridge Gas Inc. (Enbridge Gas) applied to the Ontario Energy Board (OEB) on November 24, 2025, under section 90 and 97 of the *Ontario Energy Board Act, 1998*, (OEB Act) for an order granting leave to construct approximately 2.0 kilometres of natural gas distribution pipelines and associated facilities in the Township of St. Clair (Project). These pipelines are to replace the existing Waubuno Compressor Package due to identified reliability and obsolescence concerns and the Waubuno Gathering System to address integrity concerns.

The Project is comprised of two main components: Waubuno Compressor Package Lifecycle Replacement (Waubuno Compressor Replacement) and Waubuno Pool Gathering System Integrity Replacement with Enhancements (Gathering System Replacement and Enhancements). Gathering System Replacement includes pipeline replacement to facilitate in-line inspection of the Waubuno Gathering Line and to eliminate the integrity risks associated with the well laterals while associated “Enhancements” refer to upsizing of some of these pipelines for unrelated reasons. The application does not request approval of certain parts of the Project as further explained below.

Waubuno Compressor Replacement

OEB Approval Requested:

- 1.1 km of Nominal Pipe Size (NPS) 12 steel natural gas pipeline from the Waubuno Pool Station to Enbridge Gas’s existing NPS 36 Dawn to Corunna pipeline to replace the Waubuno Compressor Package

No OEB Approval Requested:

- Installation of a new launcher and Valve Site to facilitate the tie-in of the new NPS 12 natural gas pipeline to the existing NPS 36 Dawn to Corunna pipeline. The site will also include the installation of an in-line inspection barrel, enabling continuous inspection of both the Waubuno Gathering Line and the new NPS 12 natural gas pipeline connected to the NPS 36 Dawn to Corunna pipeline.

Gathering System Replacement and Enhancements

Associated with the Gathering System integrity replacement is incremental project scope (Enhancements), that includes upsizing various segments of the gathering system along with some “like-for-like” replacements. Enbridge Gas stated it reviewed the Waubuno Storage Pool’s eligibility for future delta pressuring projects and/or increased withdrawal which would be paid for by the non-utility storage business.

Enbridge Gas stated its non-utility business is proposing this incremental project scope to ensure all new facilities associated with the Waubuno Storage Pool are adequately designed for future delta pressuring projects or incremental withdrawal projects.

OEB Approval Requested:

- Replacement of approximately 190 m of NPS 4, 290 m of NPS 6, 240 m of NPS 8, and 110 m of NPS 10 natural gas pipelines that comprise the Waubuno Gathering Line with approximately 640 m of NPS 12 steel natural gas pipelines
- Replacement of three existing NPS 4 steel natural gas pipeline well laterals totaling 195 m with NPS 8 steel natural gas pipelines within the Waubuno Gathering System.
- Like-for-like replacement of 25 m of existing NPS 8 steel natural gas pipeline well lateral and 87 m of existing NPS 10 steel natural gas pipeline well lateral within the Waubuno Gathering System

No OEB Approval Requested:

- Abandonment of approximately 190 m of NPS 4, 290 m of NPS 6, 240 m of NPS 8, and 110 m of NPS 10 natural gas pipelines that comprise the Waubuno Gathering Line
- Installation of a new NPS 12 receiver at the end of the Waubuno Gathering Line. This site will consist of an in-line inspection barrel, filter-separator and atmospheric tank

Related to both the Compressor Package and Gathering System Integrity Replacements

No OEB Approval Requested:

- Rebuild of the existing Waubuno Pool Station to accommodate the tie-ins for the new NPS 12 natural gas pipeline and the new NPS 12 Waubuno Gathering Line. Removal of the existing Waubuno Compressor will also be completed during the rebuild.

Enbridge Gas also applied to the OEB under section 97 of the OEB Act for approval of the forms of land-use agreements it offers to landowners affected by the routing or location of the Project. Enbridge Gas has a Franchise Agreement¹ and a Certificate of Public Convenience and Necessity² that cover all areas within St. Clair Township within

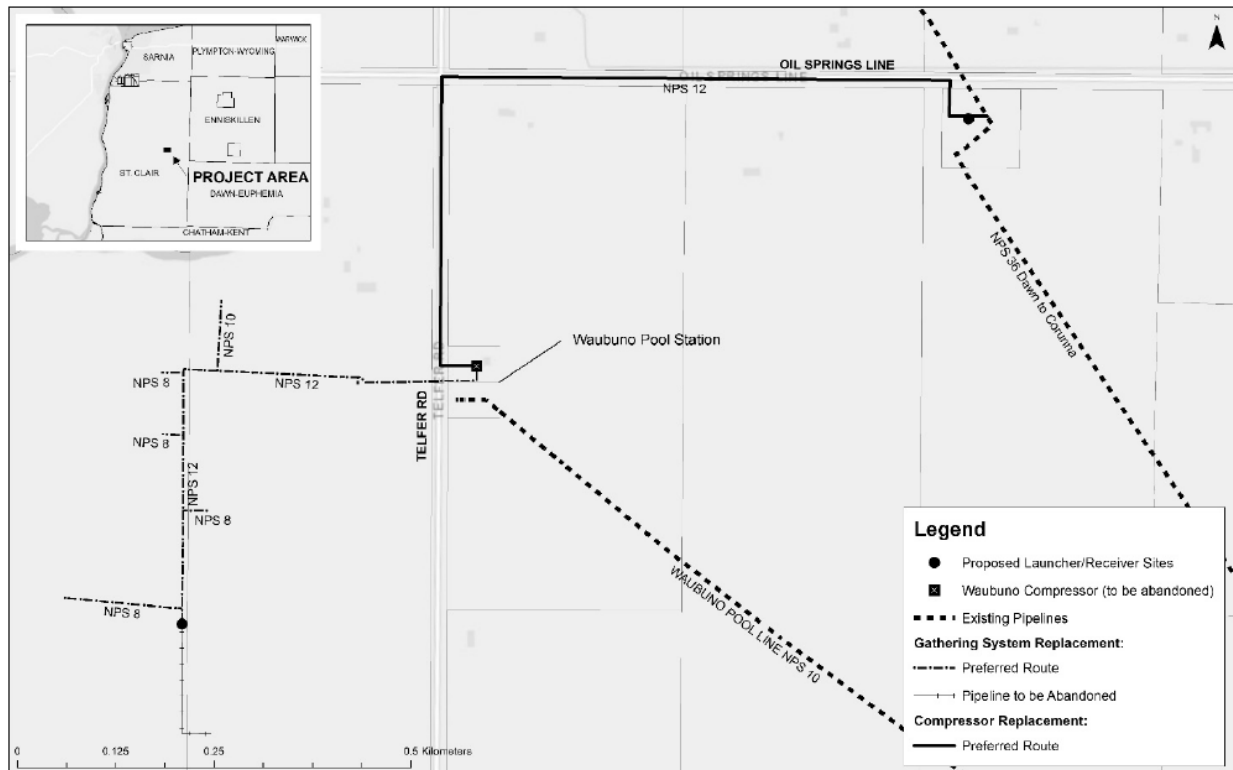
¹ St. Clair Township Franchise Agreement – EB-2010-0382 (effective until March 14, 2031).

² St. Clair Township Certificate of Public Convenience and Necessity – EB-2010-0384 (issued on February 15, 2011).

which the Project will be constructed. These franchise agreements and certificates allow Enbridge Gas to construct, operate and add to the natural gas distribution system within all parts of the municipality.

A general location of the Project is shown on the map below:

Waubuno Gathering System & Compressor Replacement



Enbridge Gas plans to commence replacement of the Waubuno Gathering System in August 2026 and it is expected to be placed into service by November 2026. Construction of the proposed NPS 12 natural gas pipeline to replace the Waubuno Compressor Package is planned to commence in February 2027 and be placed into service by September 2027.

The OEB issued a Notice of Hearing on December 19, 2025.

Donald Kabbes applied for intervenor status and was approved as an intervenor.

In Procedural Order No. 1, issued on February 5, 2026, the OEB provided for written interrogatories. OEB staff filed interrogatories on February 20, 2025 and Enbridge Gas filed its interrogatory responses on March 6, 2026.

In Procedural Order No. 2, issued on February 5, 2026, the OEB provided for intervenor evidence. Subsequently, Donald Kabbes filed evidence on March 15, 2026.³

³ Although the intervenor evidence was filed March 15, 2026, the redacted version that is the only version available on the public record was filed April 3, 2026.

Interrogatories on the evidence were submitted by Enbridge Gas on March 31, 2026 and Donald Kabbes filed responses on April 8, 2026.

Written submissions by OEB staff and Donald Kabbes must be filed by April 28, 2026. Enbridge Gas's written reply submission is due on May 12, 2026.

OEB Staff Submission

OEB staff supports the approval of Enbridge Gas's leave to construct application, subject to receiving and considering MEM's Letter of Opinion, and subject to the OEB's standard conditions of approval for natural gas leave to construct applications. OEB staff also supports the approval of the forms of land-use agreements proposed by Enbridge Gas.

Consistent with the [OEB's Standard Issues List](#) for natural gas leave to construct applications, OEB staff's submission is structured to address the following issues:

1. Project Need
2. Project Alternatives
3. Project Cost and Economics
4. Environmental Impacts
5. Landowner Matters
6. Indigenous Consultation
7. Conditions of Approval

1.0 Project Need

In order to address the needs associated with both the Waubuno Compressor Package and Waubuno Gathering System, Enbridge Gas has combined the needs into a single Project under one leave to construct application.

The Project Need section is organized as follows:

- Waubuno Compressor Package Lifecycle Replacement
- Waubuno Pool Gathering System Integrity Replacement
- Enhancements

1.1 Waubuno Compressor Package Lifecycle Replacement

The Waubuno Compressor Package Lifecycle Replacement involves the abandonment, removal and replacement of the Waubuno Compressor Package. Enbridge Gas stated this is needed to address reliability and obsolescence concerns.

The Waubuno Compressor Package consists of 1) the compressor, 2) the engine, 3) valves and 4) aftercoolers. The compressor was manufactured by the Joy Compressor Company in 1976 and installed as a used compressor in 1988 at the Waubuno Pool Station coupled with a Waukesha engine. Enbridge Gas stated a lifecycle replacement of the Waubuno Compressor Package is required due to its current condition and inability to source manufacturer recommended replacement parts. Any critical failure would render the Waubuno Compressor Package out of service for one or more operational seasons.⁴

Due to the age of the Waukesha engine, suppliers no longer have access to parts for

⁴ Exhibit B, Tab 1, Schedule 1, pp.4-5, paragraphs 16-18

this model and are unable to search for or source these parts/components. While Waukesha may be able to assist with obtaining certain components, there is no certainty that these parts will always be available.⁵

There are currently multiple mechanical problems with the compressor, some of which have compromised performance or have been temporarily addressed, but the underlying cause cannot be addressed due to lack of available parts/vendor support. Enbridge Gas claimed it has faced significant challenges sourcing replacement parts for the Waubuno Compressor Package during routine maintenance and because of equipment failures. Replacement parts for the Joy compressor do not exist in the marketplace and would need specialty fabricated or machined parts. Enbridge stated that fabricated or machined parts require using technical drawings, but these drawings are not always available. In that case, fabrication would require reverse engineering to reproduce a replacement part, which introduces additional outage time and delays for the delivery of components that would be required to repair and test the unit.⁶

In 2023, Enbridge Gas performed an Asset Health Review (AHR) on the Waubuno Compressor Package which was used as an input into a comprehensive Reliability, Availability and Maintainability (RAM) Study for the Waubuno Compressor Package.⁷

The AHR identified that the engine, valves, and aftercoolers are expected to have increasing failure rates within the 10-year study period. The compressor system is the largest contributor to the estimated injection capacity shortfall and is expected to have a constant failure rate of one failure per year in the 10-year study period. Typically, major failures take more than three months to be repaired and could result in the Waubuno Compressor Package being out of service for at least one operational season. It was also found that compressor and engine systems accounted for approximately 92% of failures.⁸

The RAM study found that there is a 12.28% injection capacity shortfall in the next 10 years and estimated that there will be 0.9 major failures in the next 10 years either on the compressor system or the engine.⁹

If the Waubuno Compressor Package were to suffer a critical failure and be out of service for one injection season, Enbridge Gas would lose access to approximately 4.0 PJ of storage space provided by the Waubuno Storage Pool of which 2.5 PJ is regulated utility storage. The 2.5 PJ of regulated storage space contributes to the total of 199.7 PJ of storage space in the Gas Supply Plan¹⁰ used to serve utility customers. Losing this storage space reduces the amount of natural gas that can be delivered from storage to utility customers during the winter months. Enbridge Gas stated that physical storage capacity is a critical component of the Gas Supply Plan and provides a low-cost and reliable method to mitigate weather/demand and price volatility by allowing

⁵ Exhibit B, Tab 1, Schedule 1, p.5, paragraph 19

⁶ Exhibit B, Tab 1, Schedule 1, p.6, paragraph 20-21

⁷ Exhibit B, Tab 1, Schedule 1, p. 4, paragraph 14

⁸ Exhibit B, Tab 1, Schedule 1, p. 7, paragraph 23

⁹ Exhibit B, Tab 1, Schedule 1, p. 7, paragraph 24

¹⁰ EB-2025-0065

Enbridge Gas to inject excess gas supply if demands are low and to withdraw when demands increase. Storage also mitigates supply interruption risk by providing a reliable and flexible on-system source of supply.¹¹

Should the Waubuno Compressor Package experience a failure that prevents the Waubuno Storage Pool from being filled, the estimated annual financial impact based on market prices¹² to mitigate the lost storage space is approximately \$6.3 million. Using the maximum market prices observed over the past 10 years, the estimated annual impact to mitigate the lost storage space capacity would be approximately \$12.9 million. This range of financial consequences would mean approximately \$3.9 million to \$8.0 million of annual financial impact would be borne by utility rate payers. The financial impact of \$12.9 million places it in the Very High-Risk category on the Enbridge Operational Risk Matrix, while a \$6.3 million impact would be classified as a High-Risk. As per Enbridge Gas's risk management requirements, all risks rated High or Very High must be treated to reduce exposure to acceptable levels.¹³

Enbridge Gas indicated that NPS 12 was the minimum pipeline size required to replace the existing compressor and maintain existing storage space and injection capability.¹⁴

1.2 Waubuno Pool Gathering System Integrity Replacement

The Waubuno Pool Gathering System Integrity replacement involves the replacement of the Waubuno Storage Pool Gathering Line (Waubuno Gathering Line) and select well laterals in the Waubuno Storage Pool (together with the Waubuno Gathering Line, the Waubuno Gathering System). Enbridge stated that the replacement is needed to address integrity concerns.

According to Enbridge Gas, their integrity management program now recognizes Long Seam Cracking (LSC) and Selective Seam Weld Corrosion (SSWC) as critical threats to health and safety.¹⁵ The Waubuno Gathering System has never undergone in-line inspection to evaluate these specific threats due to it having an incompatible configuration that prevents in-line inspection from being performed. The most recent hazard assessment completed on the pipeline system by Enbridge Gas found that the Waubuno Gathering Line and three well laterals were susceptible to LSC and SSWC hazards.¹⁶

Selective Seam Weld Corrosion (SSWC)

Enbridge Gas stated SSWC is corrosion preferentially affecting the longitudinal seam area of a pipeline and that it is most often found in pre-1970 pipelines manufactured using certain welding techniques. SSWC is a time-dependent threat where the potential risk of failure¹⁷ increases over the lifespan of a susceptible pipeline. Enbridge Gas

¹¹ Exhibit B, Tab 1, Schedule 1, pp. 8-9, paragraph 25

¹² Market prices were derived from the 10-year period between August 2013 to August 2023.

¹³ Exhibit B, Tab 1, Schedule 1, p. 9, paragraph 26

¹⁴ Response to Interrogatories, STAFF-4

¹⁵ Response to Interrogatories, STAFF-2 (a)

¹⁶ Exhibit B, Tab 1, Schedule 1, pp. 9-10, paragraph 27

¹⁷ A potential failure on the Waubuno Gathering System would be defined as any incident that causes a

stated that from published industry reports, the time to failure due to SSWC based on available data ranged widely, between 17 and 74 years.

Enbridge Gas stated that the Waubuno Gathering Line was built pre-1970 (1955), falling in the age range where industry SSWE incidents have occurred, and it has asphalt enamel coating, which may disbond over time, increasing the likelihood of SSWC.

Enbridge Gas stated that due to the multi-diameter design of the Waubuno Gathering Line (currently, NPS 6, 8 and 10), it has been unable to monitor the presence of SSWC with in-line inspections.¹⁸

The interacting nature of SSWC threat presents an elevated risk as¹⁹:

- Localized corrosion at the longitudinal weld seam occurs at a faster rate compared to the pipe body.
- Pre-1970s pipe seams generally exhibit low toughness and failures interacting with low toughness seams could result in rupture. Several notable rupture incidents involving SSWC are known to have occurred even at a relatively lower percentage of Specified Minimum Yield Strength.
- SSWC could interact with stable manufacturing seam flaws (exposed to a pressure test) and cause a failure where such features would remain stable otherwise.

Long Seam Cracking (LSC)

A crack present within the heat affected zone or the weld bondline of the longitudinal seam of a pipeline is referred to as LSC. Like SSWC, this hazard is predominantly found in pre-1970s pipelines where manufacturing practices resulted in localized stress concentration zones that could serve as starting points for cracks to initiate and propagate. The Waubuno Gathering System has 1955 vintage low frequency electric resistance welding (LF-ERW) seams which are known to contain seam-weld anomalies.²⁰

Prior integrity digs on the Waubuno Gathering System revealed cold welds on the long-seam of certain pipe segments which while not immediately concerning threats, can cause stress concentrations causing crack-like features to form over the asset lives.²¹

Enbridge Gas stated that although rare, instances of failures in the industry have been known to occur due to long-seam cracking on LF-ERW welded pipelines.²²

Loss of containment on the Waubuno Gathering System would result in shutting down the Storage pool for repair. Enbridge Gas stated that if the failure prevented injection or withdrawal operations from proceeding, the estimated financial impact would be

loss of containment. Response to Interrogatories, STAFF-2 (b)

¹⁸ Exhibit B, Tab 1, Schedule 1, pp. 10-11, paragraph 21

¹⁹ Exhibit B, Tab 1, Schedule 1, p. 11, paragraph 32

²⁰ Exhibit B, Tab 1, Schedule 1, p. 11-12, paragraph 33-35

²¹ Exhibit B, Tab 1, Schedule 1, p. 12, paragraph 36

²² Exhibit B, Tab 1, Schedule 1, p. 12, paragraph 37

comparable to that of a compressor outage that prevents completion of an injection cycle, as described above.²³

Gathering System Inspection Methods

As part of its Integrity Management Program, Enbridge Gas is required to monitor conditions which can lead to failures. SSWC can be detected and sized using circumferential magnetic flux leakage (CMFL) in-line inspection (ILI) technology. However, the Waubuno Gathering System cannot be traversed by CMFL tools in its current configuration. Retrofitting of the system has been considered, as has replacement using pipe and coatings not susceptible to SSWC. Enbridge Gas stated that CMFL technology is not presently available for NPS 4 pipelines, and therefore the retrofit option was not considered for the three well laterals.

As alternatives to traditional in-line inspection, Enbridge Gas considered various inspection methods including direct examination, direct assessment and non-conventional in-line inspection tools. Enbridge Gas stated the alternative inspection methodologies evaluated are not sustainable in the long term for continual, repeatable and efficient integrity assessment of the Waubuno Gathering System with respect to LSC and SSWC.²⁴

Enbridge Gas stated that due to the multi-diameter design of the Waubuno Gathering line, any CMFL in-line inspection tool is restricted by its collapsibility. Enbridge Gas stated that although it is possible to inspect each diameter of the gathering system independently, it is uneconomical on a sustained basis due to the additional facilities and inspection tools required to enable multiple inspections. Enbridge Gas also stated that the alternative methodologies have limitations with respect to data they would provide on the long-seam condition of the pipeline, limiting the ability of Enbridge Gas to effectively assess and respond to long-seam threats. Enbridge Gas determined conventional in-line inspection is the preferred method to monitor the integrity threats on the Waubuno gathering system. Upsizing sections of the Waubuno gathering line enables conventional in-line inspection facilitates management of integrity concerns.²⁵

1.3 Enhancements

Enbridge Gas stated that, following the establishment of the Preferred Alternative (described in the following section of these submissions, 2.0 Project Alternatives), it subsequently reviewed the Waubuno Storage Pool's eligibility for future delta pressuring projects and/or increased withdrawal which would be paid for by the non-utility storage business. Enbridge Gas stated its non-utility business is proposing incremental project scope to ensure all new facilities associated with the Waubuno Storage Pool are adequately designed for future delta pressuring projects or incremental withdrawal projects. Enbridge Gas is not proposing incremental storage space capacity or withdrawal capability as part of this project. Enbridge Gas stated that for the current storage year, as has been the case historically, it is fully contracted with respect to

²³ Response to Interrogatories, STAFF-2 (c-d)

²⁴ Exhibit B, Tab 1, Schedule 1, pp. 12-14, paragraphs 39-40

²⁵ Exhibit B, Tab 1, Schedule 1, pp. 12-14, paragraph 39-41

storage capacity and deliverability and the demand for unregulated storage exceeds the contracts able to be awarded.²⁶

The incremental enhancements (Enhancements) include upsizing various segments of the gathering system along with some “like-for-like” replacements.²⁷

1.4 Submissions

OEB staff submits that Enbridge Gas has established the need for the Project.

With respect to the Waubuno Compressor Package, OEB staff submits:

- The RAM study supports that no action taken results in reliability and obsolescence issues exceeding risk exposure beyond acceptable levels that will continue to escalate.
- A long-term solution is required.
- There would be considerable financial impact to ratepayers in the event the Waubuno Storage Pool goes down due to Compressor Package related failure.

With respect to the Gathering System, OEB staff submits:

- The Waubuno Gathering System meets criteria for which LSC and SSWC incidents have been known to occur.
- Pipe replacement or retrofit is needed to accommodate in-line inspection, to monitor the LSC and SSWC hazards.
- In-line inspection proposed by Enbridge Gas is the best method to monitor the LSC and SSWC hazards.

With respect to the Enhancements, OEB staff accepts Enbridge Gas’s reasoning that it is fully contracted with respect to storage capacity and deliverability and the demand for unregulated storage exceeds the contracts able to be awarded.

2.0 Project Alternatives

Enbridge Gas considered facilities alternatives as well as Integrated Resources Planning (IRP) alternatives to the Project. To assess IRP alternatives to the Project, Enbridge Gas applied Binary Screening criteria set by the OEB approved Integrated Resource Planning Framework (IRP Framework)²⁸ and Technical Screening criteria, after the Binary Screening, as per Enbridge Gas’s IRP Assessment Screening and Evaluation Guidelines²⁹.

Enbridge Gas concluded that according to the Technical Screening criteria, the Project Need, which falls under two investment asset classes of Compressor Stations and

²⁶ Response to Interrogatories, STAFF-2 (b-c)

²⁷ Exhibit C, Tab 1, Schedule 1, p. 19, paragraph 44

²⁸ EB-2020-0091, OEB IRP Framework (Appendix A of OEB Decision and Orders, July 22, 2021).

²⁹ EB-2025-0064, Exhibit I.1.13-ED-4, Attachment 1, Appendix F - IRP Assessment Screening and Evaluation Guidelines, July 4, 2025. These Technical Screening criteria have not been formally reviewed or approved by the OEB.

Storage Pools & Wells, does not warrant further IRP consideration. Enbridge Gas stated that this project is required to maintain existing physical storage space capacity and capability and that physical storage space also allows it to mitigate supply interruption risk by providing a reliable and flexible source of supply. Enbridge Gas stated “these types of investments cannot be offset by IRP alternatives and therefore have been screened out at the Technical Screening stage.”³⁰

Compressor Replacement

Enbridge Gas considered three facility options for compressor replacement including an NPS 12 Natural Gas pipeline (Compressor Replacement Alternative 1), natural gas fired compression and electric drive motor compression. Enbridge Gas concluded Compressor Replacement Alternative 1 is the preferred option due to having the lowest total capital cost, lowest annual expense and the highest Net Present Value. The opportunity to replace compression with a pipeline alternative simplifies operation by removal of compressor assets and improves emission performance. It also satisfies the timing criteria (proposed in-service date of September 1, 2027) and provides benefits due to lower emissions by eliminating an additional compressor and utilizing existing compression at Dawn Operations Center. The proposed pipeline was subject to a routing analysis to select a preferred route that reduces potential environmental and socio-economic impacts and this determination was supported by the Environmental Report³¹ filed with the application.

Gathering System Replacement

Enbridge Gas considered two options for Gathering System Replacement including an NPS 8 and NPS 10 Waubuno Gathering Line option (Gathering System Alternative 1) and an NPS 10 Waubuno Gathering Line option (Gathering System Alternative 2).

The preferred option is Gathering System Alternative 2. When combined with Compressor Replacement Alternative 1, the single diameter gathering line allows for in-line inspection with the proposed NPS 12 compressor replacement pipeline, in a single continuous system using dual diameter NPS 10/12 in-line inspection tools. This option allows for the reduction of launcher-receiver pairs required from two to one, minimizing direct capital costs. With respect to asset integrity and reliability, this option provides the greatest compatibility with the preferred compressor replacement option as it minimizes above-ground infrastructure and minimizes operational costs. This option has the lowest capital cost estimate, the lowest annual O&M and capital maintenance cost, and the higher NPV.

The Preferred Alternative includes Compressor Replacement Alternative 1 and Gathering System Alternative 2.

Enbridge Gas did not include the Enhancements in alternatives analysis as the upsizing of gathering system pipelines does not affect the Preferred Alternative overall

³⁰ Exhibit C, Tab 1, Schedule 1, p.2, paragraph 4

³¹ Exhibit F, Tab 1, Schedule 1, Attachment 1

assessment and is being paid for by the non-utility business.³² Table 1 below identifies the specific facility differences with and without the Enhancements.³³

Table 1: Project Component Comparison Table

Components	Preferred Alternative	Preferred Alternative with Enhancements (Proposed Project)
NPS 10 Waubuno Gathering Line	530 m	0 m
NPS 12 Waubuno Gathering Line	0 m	640 m
NPS 12 from Waubuno Pool Station to NPS 36 Dawn to Corunna Pipeline	1100 m	1100 m
NPS 12 launcher/receiver	1	2
NPS 10 launcher/receiver	1	0
NPS 4 Well Lateral Replacement	195 m	0 m
NPS 8 Well Lateral Replacement	0 m	220 m
NPS 10 Well Lateral Replacement	0 m	87 m
New tie-in-valve site	Yes	Yes
Remove Waubuno Compressor	Yes	Yes
Rebuild Waubuno Pool Station	Yes	Yes

2.1 Submissions

Based on Enbridge Gas's evidence, OEB staff submits that the Preferred Alternative with the Enhancements is the best alternative to meet the need. Also, in OEB staff's view, IRP alternatives are likely not viable to address the need.

3.0 Project Cost and Economics

Total Project cost is estimated to be \$22.4 million. Excluding indirect overheads, the total estimated direct capital cost of the Project is \$21.4 million. The estimated Project costs, including the allocation between the Preferred Alternative and Enhancements are set in the table below.³⁴ Ancillary facilities include the rebuild of the Waubuno Pool Station, new launcher and valve site, and new receiver site.³⁵

Table 2: Breakdown of Costs between the Preferred Alternative (Compressor Replacement Alternative 1 and Gathering System Alternative 2) and the Enhancements

³² Exhibit C, Tab 1, Schedule 1, p. 20, paragraph 45

³³ Exhibit C, Tab 1, Schedule 1, p. 21

³⁴ Response to Interrogatories, STAFF-6

³⁵ Exhibit E, Tab 1, Schedule 1, p. 1

<u>Item #</u>	<u>Description</u>	<u>Pipeline Costs</u>	<u>Ancillary Costs</u>	<u>Total Costs</u>
1	Materials	\$2,338,000	\$1,092,000	\$3,430,000
1.1	<i>Preferred Alternative</i>	\$2,229,270	\$1,092,000	\$3,321,270
1.2	<i>Enhancements</i>	\$108,730	\$0	\$108,730
2	Construction and Labour	\$6,476,261	\$2,161,158	\$8,637,419
2.1	<i>Preferred Alternative</i>	\$6,018,835	\$2,161,158	\$8,179,993
2.2	<i>Enhancements</i>	\$457,426	\$0	\$457,426
3	External Permitting & Lands	\$245,400	\$54,600	\$300,000
3.1	<i>Preferred Alternative</i>	\$223,130	\$54,600	\$277,730
3.2	<i>Enhancements</i>	\$22,270	\$0	\$22,270
4	Outside Services	\$2,402,100	\$942,900	\$3,345,000
4.1	<i>Preferred Alternative</i>	\$2,258,000	\$942,900	\$3,200,900
4.2	<i>Enhancements</i>	\$144,100	\$0	\$144,100
5	Contingency	\$2,865,441	\$1,062,665	\$3,928,106
5.1	<i>Preferred Alternative</i>	\$2,682,309	\$1,062,665	\$3,744,975
5.2	<i>Enhancements</i>	\$183,132	\$0	\$183,132
6	Direct Capital Cost	\$14,327,202	\$5,313,323	\$19,640,525
6.1	<i>Preferred Alternative</i>	\$13,411,545	\$5,313,323	\$18,724,867
6.2	<i>Enhancements</i>	\$915,658	\$0	\$915,658
7	Interest During Construction	\$246,295	\$114,939	\$361,234
7.1	<i>Preferred Alternative</i>	\$236,382	\$114,939	\$351,321
7.2	<i>Enhancements</i>	\$9,913	\$0	\$9,913
8	Indirect Overheads	\$767,123	\$245,018	\$1,012,141
8.1	<i>Preferred Alternative</i>	\$767,123	\$245,018	\$1,012,141
8.2	<i>Enhancements</i>	\$0	\$0	\$0
9	Dismantlement	\$882,875	\$517,125	\$1,400,000
9.1	<i>Preferred Alternative</i>	\$860,769	\$517,125	\$1,377,894
9.2	<i>Enhancements</i>	\$22,106	\$0	\$22,106
10	Total Project Costs	\$16,223,495	\$6,190,405	\$22,413,900

The Estimated Project Costs includes a 25% contingency applied to all direct costs. Enbridge Gas noted that this contingency amount has been calculated based on the risk profile of the Project. Enbridge Gas stated that while no two projects are the same, the contingency of 25% is consistent with other projects.³⁶

Enbridge Gas stated that the OEB in its Decision on Settlement Proposal and Interim Rate Order in Phase 2 of its 2024 Rebasing application³⁷ approved the following:

- Enbridge Gas will implement its harmonized storage cost allocation methodology and all new storage assets added starting in 2024 will be allocated as 62% to regulated storage and 38% to unregulated storage

³⁶ Response to STAFF-7 (a)

³⁷ EB-2024-0111, Decision on Settlement Proposal and Interim Rate Order, Exhibit N, Tab 1, Schedule 1.

- New storage assets resulting in additional storage space capacity and withdrawal capability would be allocated to unregulated storage.³⁸

Enbridge Gas stated the need for the Project comes from concerns related to integrity, reliability and asset obsolescence and not by a desire to increase storage space capacity or withdrawal capability for ex-franchise customers. Enbridge Gas stated the associated cost is allocated in accordance with the approved Phase 2 Partial Settlement of the 2024 Rebasing application and that incremental costs associated with enhancements beyond the replacement facilities are allocated to the unregulated business.³⁹

The capital costs for the Project will be allocated as per Table 3, below, in accordance with Enbridge Gas's storage allocation methodology. Enbridge Gas stated that all costs associated with the portion of unregulated storage operations will be captured in the unregulated accounts and as a result, Enbridge Gas's ratepayers will not incur any rate impacts of the unregulated allocations. Enbridge Gas noted that the Enhancements are 100% allocated to unregulated storage operations, as shown in Table 3⁴⁰, below.

Table 3: Project Storage Cost Allocation

Facility and Type	Storage Cost Allocation ¹¹	Forecasted Capital Cost ¹²
Preferred Alternative	62.2% Regulated	\$12,722,439
Preferred Alternative	37.8% Unregulated	\$7,731,643
Enhancements	100% Unregulated	\$947,677
Total Direct Project Cost		\$21,401,760

Enbridge Gas did not complete an economic test (i.e. Discounted Cash Flow report) for the Project as it believed that E.B.O. 188 and E.B.O. 134 apply to system expansion projects. It stated this project has no new customer connections or incremental resulting demand so therefore it is not a system expansion project.⁴¹ A DCF report was not completed for the Enhancements as this portion is being paid for by the non-utility business. Enbridge Gas stated that the Project will replace an equivalent amount of Design Day storage space capacity and injection capability to that being lost, and no incremental storage space capacity or withdrawal capability will be created by the Project.

3.1 Submissions

OEB staff has no concerns about the cost estimates or economics for this Project. OEB Staff submits the allocation between Preferred Alternative and Enhancements for each item appear reasonable. OEB staff submits that a 25% contingency is reasonable as it is consistent with the project's stage and with contingency level for other projects.

³⁸ Exhibit B, Tab 3, Schedule 1, pp. 1-2, paragraph 2

³⁹ Exhibit B, Tab 3, Schedule 1, p. 2, paragraph 3

⁴⁰ Exhibit E, Tab 1, Schedule 1, p. 4

⁴¹ Response to STAFF-9 (a-b)

4.0 Environmental Impacts

Environmental Report (ER) for the Project⁴² was completed by Stantec Consulting Limited (Stantec) in accordance with the OEB's Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th Edition, 2023 (OEB Environmental Guidelines).

Enbridge Gas stated that the draft ER was circulated to the Ontario Pipeline Coordinating Committee (OPCC), Indigenous communities and all other parties identified on the Project contact lists on July 28, 2025. Enbridge Gas filed a summary of the comments received on the ER along with subsequent responses, as part of its evidence.⁴³

Donald Kabbes indicated in their evidence, preference for the NPS 12 Compressor Replacement pipeline to be routed through agricultural land, opposed to the selected route and claimed the selected route creates safety and quality-of life concerns.⁴⁴ The selected route is expected to follow the public road allowance for the majority⁴⁵ of the proposed pipeline route, passing in front of Donald Kabbes's property⁴⁶. Enbridge Gas indicated it evaluated an alternative agricultural route for the NPS 12 Compressor Replacement pipeline and provided reasons why the preferred route was selected.⁴⁷ The ER stated that the overarching objective in the route selection process is that the route presents the least potential for adverse environmental and socio-economic impacts. The ER indicated that one of the principles in achieving that is using or paralleling existing infrastructure. The ER stated that the agricultural route considered would result in new impacts to private property and productive agricultural land.⁴⁸ Enbridge Gas also explained that routing the pipeline within the road allowance is preferred as it avoids potential impacts to agricultural land and the additional requirement (and costs) associated with working on it including topsoil stripping and soil decompaction measures. Enbridge Gas noted that agricultural routing increases the risk of third-party damage to pipelines during farming activities, such as tilling.⁴⁹

According to Enbridge Gas, the mitigation measures and monitoring and contingency plans set out in the ER and additional mitigation measures provided by regulatory agencies and Indigenous communities through the permitting and approval process and consultation, construction of the Project will have negligible impacts on the environment. Enbridge Gas also stated that the cumulative effects assessment determined that no

⁴² Exhibit F, Tab 1, Schedule 1, Attachment 1: Waubuno Gathering System & Compressor Replacement Project: Environmental Report

⁴³ Exhibit F, Tab 1, Schedule 1, Attachment 1, Appendix A.6

⁴⁴ Intervenor Evidence

⁴⁵ The application states this to instead be the entirety of the proposed pipeline route but per Response to Interrogatories STAFF-13 (a-b), this was updated to the majority.

⁴⁶ Intervenor Evidence,

⁴⁷ Response to Interrogatories, DK-2

⁴⁸ Exhibit F, Tab 1, Schedule 1, Attachment 1, Section 4.5, pp. 79-81

⁴⁹ Response to Interrogatories, DK-2

significant cumulative effects are anticipated to occur.⁵⁰

Enbridge Gas stated that a Stage 1 archaeological assessment (AA) was completed and submitted for review to the Ministry of Citizenship and Multiculturalism (MCM) and that a Stage 2 AA and subsequently required archaeological studies, will be completed for any area that retains archaeological potential and submitted to MCM for review. Fieldwork for the Stage 2 AA is scheduled to commence in spring of 2026.⁵¹

Consulted Indigenous communities received a draft of the Stage 1 AA report for review in July 2025 and provided no comments. Enbridge Gas stated that all of the Indigenous groups required to be consulted on this Project will be invited to have archaeological monitors attend and participate in the Stage 2 AA surveys.⁵²

Enbridge Gas stated that a Cultural Heritage Screening Report (CHSR) was prepared and found multiple structures over 40 years of age with the study area indicating potential cultural heritage value. Enbridge stated that Stantec is completing a Cultural Heritage report to review potential impacts to the identified structure and provided recommended mitigation measures, as necessary. It will be submitted to the MCM once complete.⁵³

Enbridge Gas stated that it filed an application with the TSSA on August 28, 2025 and that the TSSA reviewed its application and design, and confirmed they did not find any non-compliances with Ontario Regulation 210/01: Oil and Gas Pipeline Systems or CSA Z662:23.⁵⁴ The TSSA's review letter was submitted in the application.⁵⁵

4.1 Submissions

OEB staff submits that Enbridge Gas has completed the ER in accordance with the OEB's Environmental Guidelines. OEB staff notes that Enbridge Gas continues to respond to any comments by Indigenous communities related to the Project's environmental assessment. OEB staff has no concerns about the environmental aspects of the Project, based on Enbridge Gas's commitment to implement the mitigation measures set out in the ER.

OEB staff submits that Enbridge Gas's compliance with the OEB's standard conditions of approval for leave to construct natural gas projects will ensure that impacts of pipeline construction are mitigated and monitored. OEB staff notes that the conditions of approval also require Enbridge Gas to obtain all necessary approvals, permits, licences, and certificates needed to construct, operate and maintain the Project. OEB staff submits that Enbridge Gas evaluated an alternative route option through agricultural land, aligned with Donald Kabbes's preference and provided sufficient reasoning for why the selected route is optimal.

⁵⁰ Exhibit F, Tab 1, Schedule 1, p. 5

⁵¹ Response to Interrogatories STAFF-12 (e-f)

⁵² Response to Interrogatories STAFF-12 g)

⁵³ Response to Interrogatories STAFF-12 (a-c)

⁵⁴ Exhibit D, Tab 1, Schedule 1, p. 9

⁵⁵ Exhibit D, Tab 1, Schedule 1, Attachment 3

5.0 Landowner Matters

Enbridge Gas stated that the proposed 1.1 km of NPS 12 natural gas pipeline (Compressor Replacement) is anticipated to follow the public road allowance for the majority⁵⁶ of the proposed pipeline route. Enbridge Gas states it has pre-existing rights granted through By-Law # 31 of 2010, “A By-Law to authorize a Franchise Agreement Between the Corporation of The Township of St. Clair and Union Gas Limited”. A permanent easement is required and was discussed with the affected landowner, as well as an option for a fee simple purchase of a portion of the property required for the pipeline. The landowner expressed that they do not want to execute any agreements with Enbridge Gas until an OEB decision is made and the proposed pipeline route is confirmed.⁵⁷

Enbridge Gas stated that the Gathering System replacement is located with the bounds of existing easement lands and that the land rights to complete this work were previously granted to Enbridge Gas through existing easement agreement and reference plans registered on the title of each property. Additionally, Enbridge Gas maintains a Gas Storage Lease on the title of each property, granting it the rights to complete the proposed scope of work. Enbridge Gas does not anticipate that any new permanent easements will be required for the proposed Gathering System replacement.

Enbridge Gas is seeking temporary land use (TLU) for four private properties, three of which it maintains a Gas Storage Lease on. Enbridge Gas stated that the Gas Storage Lease grants it the right to complete this scope of work. Enbridge Gas stated that the remaining property will require a Temporary Land Use Agreement with the affected landowner to complete the scope of work and that preliminary discussions with this landowner have taken place, however an agreement has not been finalized. This is the same landowner where a permanent easement is required.⁵⁸

The evidence includes forms of Easement Agreement that will be provided to landowners should it be determined that an easement is required. The evidence also includes a form of temporary land use agreement that Enbridge Gas will offer to the landowner of the property it is seeking TLU on that does not have an existing Gas Storage Lease.⁵⁹ The forms of these agreements have been previously approved by the OEB for use in Enbridge Gas’s Company’s Watford Pipeline Project.⁶⁰

5.1 Submissions

OEB staff submits that the OEB should approve the proposed forms of easement agreement and temporary working area agreement as both were previously approved

⁵⁶ The application states this to instead be the entirety of the proposed pipeline route but per Response to Interrogatories STAFF-13 (a-b), this was updated to the majority.

⁵⁷ Response to Interrogatories STAFF-13 (a-b)

⁵⁸ *ibid*

⁵⁹ Exhibit G, Tab 1, Schedule 1, Attachment 6 and Attachment 7

⁶⁰ EB-2023-0175

by the OEB.

5.2 Intervenor (Donald Kabbes) concerns

Donald Kabbes objected to the proposed routing of the NPS 12 Compressor Replacement pipeline. The intervenor evidence presented preferred alternative routing through agricultural land which was stated may alleviate safety and quality-of life concerns. Donald Kabbes stated that they received no direct notification from Enbridge Gas regarding the proposed routing of the pipeline in front of their property.⁶¹ In response to interrogatories, Donald Kabbes indicated they did not receive the Notice of Upcoming Project or Notice of Study Commencement and Virtual Information Session that Enbridge indicated Stantec sent on behalf of itself to adjacent residents.⁶²

In response to interrogatories, Enbridge Gas provided information about the status of land negotiations, including with respect to a landowner who was approved as an intervenor in this proceeding (Donald Kabbes). The information included that Enbridge Gas held an in-person meeting with Donald Kabbes on October 14, 2025, and another meeting on November 7, 2025.⁶³ Also included were two summary tables⁶⁴ that Enbridge Gas compiled of Donald Kabbes' concerns and Enbridge Gas's responses to the concerns, which Enbridge Gas stated were provided to Donald Kabbes via email on December 18, 2025.⁶⁵

One of Donald Kabbes' concerns as documented by Enbridge Gas was that they said they did not recall receiving the notices regarding the project and the open house, and they expressed disappointment that Enbridge Gas did not reach out to them directly to discuss the Project.⁶⁶ Enbridge Gas's response in the summary table included that Enbridge hired Stantec, a third-party environmental consultant, to complete a detailed review of the proposed routes, and that Enbridge Gas and Stantec sent out notices to all relevant stakeholders and published them in the Sarnia This Week newspaper. Enbridge Gas also stated in the summary table that subsequently, Enbridge Gas held a virtual information session to provide interested parties with an opportunity to review the study area, ask questions and provide input, and this session was available online from April 14 to 28, 2025. Enbridge Gas stated that the time period available to provide input concluded on May 14, 2025, after which time Enbridge Gas selected the route that followed the existing road allowance within previously disturbed lands.⁶⁷

OEB staff notes that it appeared Enbridge Gas first contacted the landowner directly on October 14, 2025, regarding temporary workspace use, at which point Donald Kabbes

⁶¹ DK Intervenor Evidence

⁶² Donald Kabbes Responses to Enbridge Gas Interrogatories on Intervenor Evidence, EGI-5

⁶³ Response to Interrogatories, STAFF-13, Table 1

⁶⁴ Response to Interrogatories, STAFF-13, Attachment 1

⁶⁵ Response to Interrogatories, STAFF-13, Table 1

⁶⁶ Response to Interrogatories, STAFF-13, Attachment 1, p. 5

⁶⁷ *ibid*

raised their various concerns with the project.^{68, 69} In response to interrogatories, Enbridge Gas stated that Donald Kabbes is unwilling to discuss the proposed temporary workspace until an OEB decision is made.⁷⁰

In the ER, it stated that the notices were mailed out to residents in the project study area via Canada Post on February 7, 2025 and April 4, 2025 respectively. Also, it states that an ad was published in Sarnia This Week on April 3, 2025.⁷¹

5.3 Submissions

OEB staff submits that through Stantec, Enbridge Gas facilitated the mailing out of Notice of Upcoming Project and Notice of Study Commencement and Virtual Information Session to residents adjacent to the project study area, including Donald Kabbes. It is unknown whether the notices were successfully delivered to Donald Kabbes' address and whether, as a result, Donald Kabbes had the opportunity to comment on the Project's routing prior to the route being selected.

6.0 Indigenous Consultation

On December 4, 2024, in accordance with the OEB Environmental Guidelines, Enbridge Gas contacted the Ministry of Energy and Mines (MEM) in respect of the Crown's duty to consult related to the Project.⁷²

MEM, by way of letter dated December 31, 2024, identified five Indigenous communities to be consulted in relation to the Project and delegated procedural aspects of the consultation to Enbridge Gas (Delegation Letter)⁷³:

- Aamjiwnaang First Nation (AFN)
- Chippewas of Kettle and Stony Point First Nation (CKSPFN)
- Chippewas of the Thames First Nation (COTTFN)
- Oneida Nation of the Thames (Oneida)
- Walpole Island First Nation (WIFN)

On January 31, 2025, Enbridge Gas sent, via email, a Notice of Upcoming Project to the identified Indigenous communities.

The application includes an Indigenous Consultation Report (ICR), along with logs and copies of communication documentation.⁷⁴ The ICR summarizes Indigenous consultation activities. The ICR covers consultation activities and a communication log

⁶⁸ Exhibit G, Tab 1, Schedule 1, Attachment 5, p. 21

⁶⁹ Response to Interrogatories, STAFF-13, Attachment 1, p. 3

⁷⁰ Response to Interrogatories, STAFF-13, Table 1

⁷¹ Exhibit F, Tab 1, Schedule 1, Attachment 1, p. 206.

⁷² Exhibit H, Tab 1, Schedule 1, Attachment 1

⁷³ Exhibit H, Tab 1, Schedule 1, Attachment 2

⁷⁴ Exhibit H, Tab 1, Schedule 1, Attachment 6 and Attachment 7

up to November 5, 2025. The ICR has also been provided to MEM.

The MEM will form an opinion as to whether the procedural aspects of consultation undertaken by Enbridge Gas to date for the purpose of the application for leave to construct for the Project have been sufficient. Determination by the MEM will be in a form of a Letter of Opinion to Enbridge Gas. Enbridge Gas stated that upon receipt of the Letter of Opinion, it would file it with the OEB.⁷⁵ This Letter of Opinion will be considered by the OEB as part of its deliberations.

On January 7, 2026, Enbridge Gas served OEB's Notice of Hearing to all the above-noted Indigenous communities, as directed by the OEB in its Letter of Direction.

In response to OEB staff interrogatories Enbridge Gas filed an updated ICR documenting the consultation as of February 19, 2026.⁷⁶

Enbridge Gas stated it is unaware of any issues that could arise from the Project that could adversely impact constitutionally protected Aboriginal or treaty rights.⁷⁷ The ICR summarizes concerns, issues and inquiries raised by the Indigenous communities during the consultation up to February 19, 2026. Concerns and comments Enbridge Gas recorded and described in the ICR are mostly related to environmental impacts and mitigation, and potential impacts to rights and interests and archaeological artifacts. Enbridge Gas has committed to ongoing engagement with Indigenous communities in relation to the Project.⁷⁸

The MEM Delegation Letter indicates MEM's preliminary assessment of the level of consultation to be conducted by Enbridge Gas for each of the five Indigenous Communities and determined that consultation is owed at a low level for all five communities.

The Delegation Letter states that Enbridge Gas should inform the MEM if, during the consultation, information warranting a deeper level of consultation becomes available. In that instance, Enbridge Gas must contact the MEM for updated guidance.

Enbridge Gas's mode of consultation with Indigenous communities includes emails, virtual meetings and in person meetings. Enbridge Gas met virtually or in person with AFN, CKSPFN and Three Fires group, COTTFN, Oneida and WIFN.⁷⁹

In addition to formal communication with the MEM that is documented on the record of the proceeding, Enbridge Gas meets monthly with MEM staff to discuss the status of consultation on the ongoing projects and applications before the OEB. Enbridge Gas noted that no formal minutes are taken for these meetings, but the information

⁷⁵ Exhibit H, Tab 1, Schedule 1, p.2, paragraph 6

⁷⁶ Response to Interrogatories STAFF-16, Attachments 2 and 3

⁷⁷ Response to Interrogatories STAFF-16 h)

⁷⁸ Response to Interrogatories STAFF-16 k)

⁷⁹ Response to Interrogatories STAFF-16 j)

exchange assists in the consultation process.⁸⁰

Enbridge Gas stated that it expects a Letter of Opinion from the MEM near the end of the record for the proceeding.⁸¹

AFN, WIFN and Oneida stated interest in participating in the field work for the Stage 2 AA. Enbridge Gas stated Stantec will reach out to all Indigenous groups required to be consulted on the Project to coordinate archaeological monitoring for those interested in participating once scheduling for the work is confirmed. Enbridge Gas stated that no Indigenous groups have expressed interest in reviewing the Stage 2 AA report(s) prior to submission to the MCM.⁸²

Enbridge Gas offered capacity funding to each of the five Indigenous communities identified as potentially impacted by the Project. According to Enbridge Gas, capacity funding is typically used by Indigenous groups to support engagement activities related to the Project, including but not limited to the technical review of Project documentation, including the environmental report (ER) and archaeological assessment reports, participation in Project meetings, reviewing and responding to emails and assisting in assessing any significant sites within the Project area. Chippewas of the Thames First Nation (COTTFN) has been provided with capacity funding. Chippewas of Kettle and Stony Point First Nation (CKSPFN) has accepted capacity funding and Enbridge Gas is in the process of making arrangements to provide them with same. Enbridge Gas is in conversation with Walpole Island First Nation on how best for the Nation to access capacity funding.⁸³ No Indigenous community raised concerns to the OEB related to the capacity funding being offered.⁸⁴

6.1 Submissions

OEB staff observes that Enbridge Gas's consultation with the Indigenous communities is ongoing and that Enbridge Gas has committed to continue engagement with the Indigenous communities during the life of the Project.⁸⁵ OEB staff submits that, to the extent that the letter of opinion may identify outstanding issues, the OEB could provide additional procedural steps to address these issues.

7.0 Conditions of Approval

The OEB has established standard conditions of approval that are typically imposed in leave to construct approvals.⁸⁶ Enbridge Gas stated that it has reviewed these standard conditions and has not identified any additional or revised conditions that it wishes to

⁸⁰ Response to Interrogatories STAFF-16 a)

⁸¹ Response to Interrogatories STAFF-16 c))

⁸² Response to Interrogatories STAFF-16, h)

⁸³ Response to Interrogatories STAFF-16, e)

⁸⁴ Response to Interrogatories STAFF-16, g)

⁸⁵ Exhibit H, Tab 1, Schedule 1, p. 4

⁸⁶ Natural Gas Facilities Handbook, Appendix D

propose for the Project.

7.1 Submissions

Subject to receiving and considering MEM's Letter of Opinion, OEB staff submits that the OEB should approve the Project subject to the OEB's standard conditions of approval for natural gas leave to construct applications.

~All of which is respectfully submitted~