



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

BY EMAIL

May 11, 2026

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

Dear Ritch Murray:

**Re: Enbridge Gas Inc. (Enbridge Gas)
2026 Storage Enhancement Project
OEB Staff Interrogatories
Ontario Energy Board File Number: EB-2026-0082**

In accordance with Procedural Order No. 1, please find attached the OEB staff interrogatories for the above proceeding. This document has been sent to Enbridge Gas Inc. and to all other registered parties to this proceeding.

Enbridge Gas Inc. is reminded that its responses to interrogatories are due by May 26 2026.

Yours truly,

Randy Doradat
Advisor, Natural Gas

Encl.

cc: EGIRegulatoryProceedings@enbridge.com
Richard Lanni, Applicant's Counsel, Enbridge Gas Inc., richard.lanni@enbridge.com
Demetrius Kappos, Ministry of Natural Resources, demetrius.kappos@ontario.ca

**OEB Staff Interrogatories
Enbridge Gas Inc.
EB-2026-0082**

Please note, Enbridge Gas 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*.

Staff - 1

Ref.: Exhibit A, Tab 2, Schedule 1, paragraph 5, p. 2;
Exhibit D, Tab 1, Schedule 1, paragraphs 24-27,30,32 p. 6,7,10,11

Preamble:

Enbridge Gas applied for approval to increase maximum operating pressure (MOP) of the Dawn 156, Bentpath and Rosedale Storage Pools to a maximum pressure gradient of 17.64 kPa/m (0.78 psi/ft) in the 2026 injection season. Enbridge Gas submitted that pressure gradient is permitted under CSA Standard Z341.1-22 Storage of Hydrocarbons in Underground Storage Formations (CSA Z341.1-22).

Enbridge Gas stated that it will be required to conform to CSA Z341.1-22 to the satisfaction of the Ministry of Natural Resources (MNR).

Clause 5.6.2 (b) of CSA Z341.1-22 requires that "The maximum operating pressure shall not exceed 80% of the fracture pressure of the caprock formation. In the absence of local fracture pressure data, the maximum pressure shall be not greater than 18.1 kPa per metre of depth to the top of the reservoir."

Enbridge Gas met with the MNR on July 8, 2025 to present the Project to the MNR staff.

On February 12, 2026 Enbridge Gas sent an email to the MNR, indicating that the following studies had been conducted for each pool in compliance with CSA Z341.1-22 and to support the application:

- Engineering studies completed by Geofirma Engineering Ltd.
- Assessment of Neighbouring Activities for the storage pools as prescribed by CSA Z341.1-22 Clause 5.2.
- "What If" analysis of hazards and operability (HAZOP) for the storage pools

Enbridge Gas also stated that it sent summaries of the studies to the MNR and that it would make complete studies available in Enbridge Gas's office for the MNR's review.

Enbridge Gas in its application stated that to date, the MNR had not contacted it to request any additional review.

Questions:

The following questions pertain to the MOP increase portions of the application.

- a) Since filing the application, has Enbridge Gas received any further communication from the MNR?
- b) If any communication was received, please indicate whether the MNR stated it is satisfied with the studies and that Enbridge Gas complied with all relevant requirements under CSA Z341.1-22, the OGSRA standards and related regulations.
- c) Please file a copy of any additional correspondence with MNR since the application was filed.
- d) If no communication has been received from the MNR regarding the final review and compliance with CSA Z341.1-22, what is the anticipated date of receiving the documentation from the MNR?
- e) Does Enbridge Gas acknowledge and accept responsibility for compliance with all relevant requirements under CSA Z341.1-22, the Oil, Gas and Salt Resources Act and related regulations to the satisfaction of the MNR?

Staff - 2

Ref.: Exhibit D, Tab 1, Schedule 1, paragraphs 24-27,30,32,33, p. 6,7,10,11

Preamble:

With respect to well drilling licenses, as a proposed condition of licence in past proceedings, the OEB has required that the applicant conform with: the relevant requirements of the CSA Z341.1-22 standard; the *Oil, Gas and Salt Resources Act* (OGSRA); O. Reg. 245/97 made under the OGSRA; and OGSRA Standards v.3.0, to the satisfaction of the Ministry of Natural Resources (MNR). In its application, Enbridge Gas stated that all design, installation and testing of the proposed well will be in accordance with these requirements.

Enbridge Gas stated that it will be required to conform to CSA Z341.1-22 to the satisfaction of the Ministry of Natural Resources (MNR).

Enbridge Gas met with the MNR on July 8, 2025 to present the Project to the MNR staff.

On February 12, 2026 Enbridge Gas sent an email to the MNR, indicating that the following studies had been conducted for each pool in compliance with CSA Z341.1-22 and to support the application:

- Engineering studies completed by Geofirma Engineering Ltd.
- Assessment of Neighbouring Activities for the storage pools as prescribed by CSA Z341.1-22 Clause 5.2.
- “What If” analysis of hazards and operability (HAZOP) for the storage pools

Enbridge Gas also stated that it sent summaries of the studies to the MNR and that it would make complete studies available in Enbridge Gas’s office for the MNR’s review.

Enbridge Gas in its application stated that to date, the MNR had not contacted it to request any additional review.

Enbridge Gas stated that it sent its drilling application via email to the MNR on December 8, 2025. The MNR acknowledged receipt on December 10, 2025.

Questions:

The following questions pertain to the well drilling license portions of the application.

- a) Since filing the application, has Enbridge Gas received any further communication from the MNR?
- b) If any communication was received, please indicate whether the MNR stated it is satisfied with the studies and that Enbridge Gas complied with all relevant requirements under CSA Z341.1-22, the OGSRA standards and related regulations.
- c) Please file a copy of any additional correspondence with MNR since the application was filed.
- d) If no communication has been received from the MNR regarding the final review and compliance with CSA Z341.1-22, what is the anticipated date of receiving the documentation from the MNR?

- e) Does Enbridge Gas acknowledge and accept responsibility for compliance with all relevant requirements under CSA Z341.1-22, the Oil, Gas and Salt Resources Act and related regulations to the satisfaction of the MNR?

Staff - 3

Ref.: Exhibit B, Tab 1, Schedule 1, paragraph 5, p. 2

Preamble:

Enbridge Gas stated that the activities set out in this application are to meet growing market demands for incremental storage space and injection and withdrawal capability. The additional 45,000 10³m³ of storage capacity and approximately 788 10³ m³/d (31 TJ/d) of withdrawal capability created by the Project will be sold as part of Enbridge Gas's unregulated storage portfolio.

Questions:

- a) Please describe how Enbridge Gas has determined growing market demand for unregulated storage services that underpins the need for the additional storage capacity and withdrawal capability related to the Dawn 156, Rosedale and Bentpath Pools.

Staff - 4

Ref.: Exhibit B, Tab 1, Schedule 1, paragraph 8, p.3 and Attachment 1
EB-2025-0293, Exhibit D, Tab 1, Schedule 1, Attachment 13
EB-2024-0304, Exhibit D, Tab 1, Schedule 1, Attachment 8

Preamble:

OEB staff observed that in previous well drilling license applications, the actual well drilling is typically scheduled to occur approximately one month after the issuance of an OEB report. However, for the current application, well drilling is scheduled for approximately six to seven months after the OEB process is concluded.

Question(s):

- a) Please explain why the well drilling license request in this application was filed considerably earlier, than it typically is, relative to the actual well drilling.

Staff - 5

Ref: Exhibit I, Tab 1, Schedule 1 and Attachments 2, 5 and 6

Preamble:

The Ministry of Energy and Mines (MEM) identified five Indigenous communities that Enbridge Gas should consult in relation to the Project:

- Aamjiwnaang First Nation
- Chippewas of Kettle and Stony Point First Nation
- Chippewas of the Thames First Nation
- Oneida Nation of the Thames
- Bkejwanong Territory / Walpole Island First Nation

In Attachment 5, Enbridge Gas filed its Indigenous Consultation Report (ICR) summarizing its Indigenous consultation activities up to February 17, 2026.

Enbridge Gas stated that it would provide its Indigenous Consultation Report for review by the MEM. The MEM will determine whether the procedural aspects of Indigenous consultation undertaken by Enbridge Gas to-date is sufficient by providing a Letter of Opinion to Enbridge Gas. Enbridge Gas is expected to file the Letter of Opinion on the record of the proceeding.

Questions:

- a) Please describe the format (e.g. virtual meetings, in-person meetings, phone calls, emails, etc.) and scope of Enbridge Gas's communication with MEM staff on the procedural aspects of Indigenous consultation delegated to Enbridge Gas, since the outset of Indigenous consultation.
- b) Please update the evidence with any correspondence between MEM and Enbridge Gas since the application was filed, regarding MEM's review of Enbridge Gas's consultation activities.
- c) Please confirm if an ICR was provided to MEM, the date it was provided, and whether the ICR provided to MEM is the same as that provided to the OEB. If there is any difference in the information provided to MEM, please provide an explanation and also provide the ICR submitted to MEM.
 - i. If Enbridge Gas has not yet provided the ICR to MEM, please explain why and provide a timeline for when the ICR is expected to be provided to MEM.

- ii. Please confirm if the updated ICR, to be filed with responses to these interrogatories was filed with MEM.
- d) Please provide an update on Indigenous consultation activities set out in Attachments 5 and 6, summarizing any issues and concerns raised and how these are being addressed. Please include any supporting documentation, i.e., email correspondence that is referenced.
- e) In updates to Attachment 5 and 6, please provide information on which Indigenous communities accepted and were provided capacity funding by Enbridge Gas to-date and describe the activities supported by the capacity funding that was provided.
- f) Please file a form of the Capacity Funding Agreement that was executed as part of the Indigenous consultation.
- g) Please advise if any Indigenous communities raised concerns with Enbridge Gas with respect to the capacity funding being offered and if so, how Enbridge Gas responded to such concerns.
- h) Please comment on any issues arising from the Project that could adversely impact constitutionally protected Aboriginal or treaty rights. Have any Indigenous communities identified any Aboriginal or treaty rights that could be adversely impacted by the Project? If any potential adverse impacts have been identified, please comment on what Enbridge Gas is doing to address these issues.
- i) Please provide a summary of all forms of accommodation that Enbridge Gas has committed and agreed to make or made to any of the consulted Indigenous communities in response to the concerns raised in the Indigenous consultation process for the Project to date.
- j) In addition to updates to Attachment 5 and Attachment 6, please provide a list of all in-person or virtual meetings with each Indigenous community (and/or their representatives) including the dates and locations of the meetings and an overview of the issues and agenda addressed in each meeting. Include any action or follow-up agreed upon to be taken by Enbridge Gas and/or Indigenous community.
- k) Please describe Enbridge Gas's plans for continuing engagement with the Indigenous communities. Which formats of communication will be used (e.g. virtual meetings, in-person meetings, phone calls, emails, etc.) and which information regarding project construction, operation, or any other aspect of the project will be conveyed?

- l) Please indicate when Enbridge Gas expects to receive a Letter of Opinion from MEM.

Staff - 6

Ref.: Letter of Comment, Jake Smit, April 2, 2026

Preamble:

In a Letter of Comment dated April 2, 2026, Jake Smit raised concerns related to fire control, emergency protocol, safety and compensation for adverse effects.

With respect to Enbridge Gas's reply to Jake Smit Letter of Comment, Rule 23.05 of the OEB's Rules of Practice and Procedure requires Enbridge Gas to address the issues raised in the Letter of Comment by way of a document filed in the proceeding before the proceeding's record is closed.

Question(s):

- a) Please provide a reply to the Letter of Comment.

Staff - 7

Ref.: [OEB CEO Policy 2026-01](#)

[Energy for Generations, Ontario's Integrated Plan to Power the Strongest Economy in the G7 \(June 2025\) \(IEP\)](#)

Preamble:

As stated in the OEB CEO Policy, the OEB shall identify the portions of the IEP that are relevant to the matters in issue in the proceeding.

Question:

- a) Please discuss if there are portions of the IEP that Enbridge Gas considers relevant to this application.

Staff - 8

Ref.: Exhibit A, Tab 2, Schedule 1

Preamble:

Enbridge Gas applied for a well drilling licence under section 40(1) of the OEB Act. Should the OEB determine that it is appropriate to do so, it would issue a favourable report to the MNR recommending the issuance of the well licence and may also recommend certain conditions.

Question:

- a) Please comment on the draft conditions of the licence proposed by OEB staff below. These are similar to those approved by the OEB in prior requests to the OEB for favourable reports to MNR on well drilling applications.

If Enbridge Gas does not agree with any of the draft conditions of approval, please identify the specific conditions that Enbridge Gas disagrees with. Explain the rationale for disagreement and for any proposed changes or amendments.

**Application under Section 40 of the OEB Act
Enbridge Gas Inc.
EB-2026-0082**

PROPOSED CONDITIONS OF LICENCE

1. Enbridge Gas Inc. (Enbridge Gas) shall rely on the evidence filed with the OEB in the EB-2026-0082 proceeding and comply with applicable laws, regulations and codes pertaining to the construction of the proposed well.
2. The authority granted under this licence to Enbridge Gas is not transferable to another party without leave of the OEB. For the purpose of this condition, another party is any party except Enbridge Gas.
3. Enbridge Gas shall construct the facilities and restore the land in accordance with its application and evidence given to the OEB, except as modified by this licence and these Conditions.
4. Enbridge Gas shall implement all the recommendations of the Environmental Report filed in the proceeding.
5. Enbridge Gas shall develop a Project-specific Spill Response Plan prior to the start of well drilling operations and following the installation of the Project facilities, the location of the facilities will be added to Enbridge Gas's Emergency Response Plan.
6. Prior to commencement of construction of the Proposed Well, Enbridge Gas shall obtain all necessary approvals, permits, licences, certificates, agreements

and rights required to construct, operate and maintain the proposed well.

7. Enbridge Gas shall ensure that the movement of equipment is carried out in compliance with all procedures filed with the OEB, and as follows:
 - i. Enbridge Gas shall make reasonable efforts to keep the affected landowner(s) as well as adjacent landowners and their respective tenant farmers, or their designated representatives, informed of its plans and construction activities; and
 - ii. The installation of facilities and construction shall be coordinated to minimize disruption of agricultural land and agricultural activities.

8. Enbridge Gas shall, subject to the recommendation of an independent tile contractor and subject to the landowner's approval, construct upstream and downstream drainage headers adjacent to the drilling area and access roads that cross existing systematic drainage tiles, prior to the delivery of heavy equipment, so that continual drainage will be maintained.

9. Concurrent with the final monitoring report referred to in Condition 10(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.

10. Both during and after construction, Enbridge Gas 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 in-service date, which shall:
 - i. Provide a certification, by a senior executive of the company, of Enbridge Gas'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, 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, licences, and certificates required to construct, operate and maintain the proposed project.
- b) A Final Monitoring Report, no later than fifteen months after the 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'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 during 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, 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.

11. For the purposes of these conditions, Enbridge Gas shall conform with:

- a) CSA Z341.1-22 "Storage of Hydrocarbons in Underground Formations" to the satisfaction of the Ministry of Natural Resources (MNR)
- b) And the requirements for well as specified in the *Oil, Gas and Salt Resources Act*, its Regulation 245/97, and the Provincial Operating Standards v.3 to the satisfaction of MNR.

12. Enbridge Gas shall designate one of its 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 MNR, 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.