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VIA RESS AND EMAIL

August 11, 2026

Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ritchie Murray:

**Re: Enbridge Gas Inc. (Enbridge Gas or the Company)
OEB File No. EB-2024-0200
St. Laurent Pipeline Replacement Project (Project)
Evidence Update Regarding New Termination Point Location**

Enbridge Gas is writing to update the OEB regarding the construction of the above-referenced Project.

The overall scope of the Project is being reduced by shortening the length of the pipeline component by approximately 550 meters for constructability reasons, resulting in a new northern termination point along the approved Project route. The replacement of the remaining pipeline beyond the new termination point will be addressed through a future Enbridge Gas application associated with the relocation of the Rockcliffe Control Station (RCS), details of which are also outlined below.

This evidence update is intended to ensure that the record for EB-2024-0200 accurately reflects the revised termination point of the Project and to advise on the relationship between it and the future RCS relocation project.

St. Laurent Pipeline Replacement Project Background

The OEB issued its Decision and Order approving the Project on March 18, 2025 (SLP Decision).¹ As set out therein, the Project is required to replace approximately 14.4 km of the existing St. Laurent Pipeline (SLP) system through the construction of approximately 17.6 km of new natural gas pipeline and associated facilities along St. Laurent Boulevard, Sandridge Road and Tremblay Road in the City of Ottawa.

¹ <https://www.rds.oeb.ca/CMWebDrawer/Record/892821/File/document>

The Project is linked to a future Enbridge Gas application regarding the relocation of the RCS, which is anticipated to be filed with the OEB in fall 2026. The RCS is situated in the Rockcliffe Park area of Ottawa, where portions of Enbridge Gas's existing pipeline corridor traverse lands owned by the National Capital Commission (NCC). The RCS relocation project involves establishing a new long-term station location that supports continued safe and reliable operation of the Ottawa-area natural gas system while addressing operational and land-use constraints associated with the existing site. It will include an OEB-regulated inlet pipeline owned by Enbridge Gas and CER-regulated replacement station and outlet pipeline facilities owned by Enbridge Gas' affiliate, Niagara Gas Transmission Limited (NGTL).

St. Laurent Replacement Project Update

Enbridge Gas has substantially advanced Project construction, having already completed the majority of the OEB-approved facilities. However, as the Project has progressed through detailed design and execution planning, Enbridge Gas has determined that the original filed route for the final 550 meters of pipeline through the NCC woodlands is not feasible due to construction, environmental, and land access constraints and that alternative routing options are required. Rather than pursue a route modification for this limited segment, Enbridge Gas has concluded that it is more practical and efficient to revise the northern termination point of the Project. The remaining connection between the new termination point on Sandridge Road and the relocated RCS will be completed as part of the future RCS relocation project and is expected to follow a new corridor along Hillsdale Road. The NCC has also expressed a preference for this alternative route.

This approach enables Enbridge Gas to place into service all but the final 550 meters of the Project and to abandon the majority of the existing pipeline in accordance with the schedule approved by the OEB. It also allows the connection to the future RCS site to be planned, reviewed, permitted and constructed as part of a single coordinated project while preserving the safety and reliability objectives of the approved St. Laurent Pipeline Replacement Project, and avoiding the need to install replacement facilities through the NCC woodlot.

Enbridge Gas is not seeking to construct any new or additional facilities, or otherwise impact any new landowners or rights holders, through this correspondence.

Interim Integrity Management for the Existing Rockcliffe Control Station Inlet

The Project scope revision described in this letter will result in the existing 550 meter RCS inlet pipe (RCS inlet) remaining in service beyond the timeframe contemplated in EB-2024-0200, pending completion of the RCS relocation project, targeted for Q4 2027.

As the originally approved route for the final segment of the Project is not viable, Enbridge Gas has assessed the continued operation of the existing RCS inlet and determined that the associated risks can be managed by implementing additional interim measures during this period.

In June 2024, the existing RCS inlet was assessed as fit-for-service on an ALARP basis² for short-term operation, contingent upon implementation of a permanent solution as soon as practicable. The associated Quantitative Risk Assessment (QRA) identified that the existing RCS inlet does not meet the reliability thresholds defined in CSA Z662 Annex O due to an elevated corrosion-related leak risk. However, the existing RCS inlet has a different risk profile than other portions of the SLP, as it is located in an area with relatively low surrounding building and structure density, reducing the potential consequences associated with gas migration and associated explosion hazards. In addition, its risk profile does not exceed any thresholds related to third-party damage, in part due to residing in an NCC protected area.

Enbridge Gas therefore considers continued operation of the existing RCS inlet during the interim period acceptable, provided all reasonable risk mitigation measures are implemented while the permanent replacement solution is advanced. Enbridge Gas will manage the remaining risk to remain as low as reasonably practicable through enhanced interim mitigation measures described below:

1. Proceeding with abandonment of the remainder of the Project in accordance with the original Project schedule approved in EB-2024-0200. This will eliminate the integrity risks associated with those assets in accordance with the schedule approved in EB-2024-0200.
2. Implementing enhanced monitoring through monthly leak surveys of the existing RCS inlet, commencing January 2027 and continuing until the asset is abandoned.
3. Confirming sufficient pipeline markers are in place for the existing RCS inlet. If not, adding markers, as appropriate.

The enhanced leak survey frequency will increase monitoring of the known corrosion-related leak risk and reduce the time between the occurrence of a leak and its detection, allowing appropriate corrective actions to be taken promptly and supporting the

² ALARP (As Low As Reasonably Practicable) in pipeline risk assessments refers to reducing risks to a level that is as low as reasonably achievable, taking into account the costs, benefits, and practicality of further risk reduction measures.

continued safe operation of the existing RCS inlet while the permanent replacement solution is advanced.

Regulatory and Consultation Considerations

The Project continues to be driven by the need to address the safety, integrity and operational reliability risks associated with the St. Laurent Pipeline System. The scope revision described in this letter does not alter the need for the Project, introduce any additional facilities under EB-2024-0200, extend the approved route, or result in any new Project-related construction impacts.

From an environmental and land-use perspective, the revised termination point avoids the need to construct replacement facilities through the NCC woodlot, thereby eliminating the environmental disturbance, permitting requirements, land access constraints, and construction complexities associated with that segment of the originally approved route. Assessment of environmental and land-use matters and Indigenous consultation related to the new route for the RCS inlet is underway and will be discussed in a future application, expected to be filed with the OEB in fall 2026.

Enbridge Gas will continue to construct, operate, and maintain the remaining Project facilities in accordance with the SLP Decision.

If you have any questions, please contact the undersigned.

Sincerely,

Nora Alganabi

Nora Alganabi
Senior Advisor, Regulatory Applications – Leave to Construct

Cc: Zora Crnojacki (OEB Staff)
Richard Lanni (Enbridge Gas Counsel)

Figure 1: Revised St. Laurent Pipeline Replacement Project Termination Point

