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

BY EMAIL

November 4, 2026

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

Dear Mr. Murray:

Re: Enbridge Gas Inc.
Casselman Pipeline RNG Project
OEB Staff Interrogatories
Ontario Energy Board File Number: EB-2026-0223

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 **November 18, 2026.**

Any questions relating to these interrogatories should be directed to the Case Manager, Tadevos Ghazaryan, at Tadevos.Ghazaryan@oeb.ca.

Yours truly,

Digitally signed by TADEVOS GHAZARYAN
Date: 2026.11.04 16:59:37 -05'00'

Tadevos Ghazaryan
Senior Advisor, Natural Gas

cc: All parties in EB-2026-0223

Encl.

OEB Staff Interrogatories
Enbridge Gas Inc.
EB-2026-0223

Please note, Enbridge Gas Inc. is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff questions 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*.

ISSUE 1.0: NEED FOR THE PROJECT

Staff-1

Reference: Exhibit D, Tab 1, Schedule 1, paragraph 16 and Exhibit E, Tab 1, Schedule 1, Attachment 1, Pages 1 and 2

Preamble:

Enbridge Gas identified a proposed in-service date of December 2027 in its construction schedule. However, the discounted cash flow (DCF) analysis filed by Enbridge Gas identifies December 20, 2027, on page 1 and December 20, 2029, on page 2. OEB Staff seeks clarification of the applicable date and the alignment of the construction schedule, customer commissioning and economic analysis.

Question(s):

a) Please reconcile the differing dates, confirm the date used in the DCF calculations, and provide corrected evidence and revised economic results where necessary.
b) Following the customer's request to place the Project on hold, please confirm the current commissioning milestones and outstanding dependencies supporting December 2027 service.

ISSUE 2.0: PROJECT ALTERNATIVES

Staff-2

Reference: Exhibit D, Tab 1, Schedule 1, Pages 1 to 7, including design-specification Tables 1 and 2.

Preamble:

Enbridge Gas filed design specifications for the proposed NPS 8 Casselman Segment and NPS 6 Ottawa Segment and identified connections to existing NPS 4 pipelines. OEB Staff seeks clarification of the hydraulic analysis supporting the selected diameters.

Question(s):

a) Please provide the technical rationale for selecting NPS 8 for the Casselman Segment and NPS 6 for the Ottawa Segment, including the design flow and relevant pressure constraints.

b) Please confirm whether smaller diameter pipe could meet the identified customer requirement. If not, explain the limiting conditions.

c) Please explain how the capacity of the existing NPS 4 connecting facilities was considered in selecting the proposed pipe diameters.

d) If either proposed diameter exceeds that required for projected near- or medium-term requirements, please identify the additional capacity and explain the rationale.

Staff-3

Reference: Exhibit F, Tab 1, Schedule 1, Attachment 1, Table 4-1, pages 121–122; "MCalande_Redacted - Letter of Comment_20261019_EN," dated October 19, 2026, pages 1 and 2.

Preamble:

Enbridge Gas filed a route assessment that identifies landowner concerns as a consideration supporting selection of the Preliminary Preferred Route over Alternative Route 1. The October 19, 2026, letter of comment raises concerns about proposed construction alongside the Fraser Drain and proposes extending trenchless installation. OEB Staff seeks clarification of how these concerns relate to the alternatives assessment and whether they affect the preferred route or construction method.

Question(s):

a) Please confirm whether the property and concerns described in the October 19, 2026, letter correspond to the landowner concerns referenced in Table 4-1. If not, explain their relationship to the routes assessed.
b) Please explain how the concerns were weighed against the alternative route characteristics, distinguishing constraints on obtaining land rights from concerns potentially addressable through design, construction methods or mitigation.
c) Please explain whether extending trenchless installation along the drain was assessed. If so, provide the comparative assessment of feasibility, risks, land requirements, environmental and landowner impacts, costs and timing. If not, explain why.

ISSUE 3.0: PROJECT COST AND ECONOMICS

Staff-4

Reference: Exhibit E, Tab 1, Schedule 1, paragraphs 7 and 8 and Attachment 2, including the service-fee, termination and financial-assurance provisions.

Preamble:

Enbridge Gas stated that the Project is fully customer-funded and filed a commercial agreement containing service-fee, termination and financial-assurance provisions. OEB Staff seeks clarification of responsibility for costs beyond the 15-year agreement term and the extent to which these arrangements protect existing ratepayers if customer revenues do not materialize or cease before the facilities reach the end of their useful lives.

Question(s):

a) Please explain who would be responsible for the facilities' operation, maintenance and integrity-management costs following expiry of the 15-year agreement, distinguishing between continued customer service, non-renewal and cessation of RNG production.
b) Please explain who would bear the costs of replacing facilities at the end of their useful lives or, where continued service is not required, decommissioning, abandonment, removal and site restoration.
c) Please explain the treatment of monthly charges if RNG production does not commence, is delayed, falls below forecast or ceases prematurely, including service suspension, customer default or insolvency. Distinguish contractual payment obligations from collectability risk and identify any resulting exposure of existing ratepayers.
d) Please identify the contractual provisions and financial assurances supporting the responses to parts (a)-(c), including whether they survive expiry or early termination of the agreement.
e) Please identify any limitations or circumstances in which existing ratepayers could bear unrecovered costs, quantify that exposure where practicable, and explain the proposed safeguards.

Staff-5

Reference: Exhibit E, Tab 1, Schedule 1, paragraphs 7-8; Attachment 2, page 50 of 59, "Exhibit C5 – Service Fees".

Preamble:

Enbridge Gas stated that the monthly service charge generates a profitability index (PI) of 1.02 and that the Project is fully customer funded. Enbridge Gas filed a Biogas Services Agreement which includes a service-fee adjustment provision that provides for recalculation using actual costs following the six-month anniversary of commissioning, with retrospective billing adjustments.

Question(s):

a) Please reconcile the monthly service charge used in the discounted cash flow (DCF) analysis with the initial contractual fee and explain whether an updated fee or customer endorsement is required before commissioning.
b) Please identify the costs and feasibility parameters adjusted through the true-up, including the treatment of cost underruns, cost overruns, financing costs and changes in operating-cost estimates.
c) Please confirm whether the recalculated fee is intended to maintain a PI of 1.02 using actual Project costs. Explain any circumstances in which it would not.
d) Please explain how costs incurred after the initial true-up, including subsequent restoration and monitoring costs, are recovered.
e) Please identify any caps, exclusions, timing restrictions or other contractual limitations on costs recoverable through the true-up. For excluded costs, explain the proposed recovery mechanism.

ISSUE 4.0: ENVIRONMENTAL IMPACTS

Staff-6

Reference: Exhibit F, Tab 1, Schedule 1, Attachment 1, sections 3.3.7 and 3.3.8, Table 5-2, section 9.1 and Appendix C.

Preamble:

Enbridge Gas filed Species at Risk Screening Tables in Appendix C that identify suitable habitat and potential species occurrence and state that targeted surveys were not conducted. OEB Staff seeks clarification of the investigations and assessment methods supporting the final impact assessment and mitigation measures.

Question(s):

a) Please identify the ecological investigations required to finalize the impact assessment and mitigation for the construction footprint, including temporary workspaces and access areas. Provide their status, seasonal windows and anticipated completion dates.
b) Where targeted surveys are not proposed for potentially affected species or habitat, explain the alternative assessment approach and its basis.
c) Please explain how the investigation, clearing and construction windows align with the proposed schedule.
d) Please identify findings that could require changes to the footprint, construction methods, mitigation or residual-effects assessment, and explain how those changes would be documented.

Staff-7

Reference: Exhibit F, Tab 1, Schedule 1, paragraphs 18 and 19; Attachment 1, Appendix D, executive summary, pages iii–v.

Preamble:

Enbridge Gas filed an archaeological assessment recommending further archaeological work and identifying additional investigation requirements if ground disturbance occurs within 10 metres of the Brisson Farm Road Cemetery's legal parcel. OEB Staff seeks clarification of the assessment schedule, coverage and controls governing construction in areas requiring further investigation.

Question(s):

a) Please provide the status and completion schedule for the Stage 2 archaeological assessment and any subsequent assessments, including associated report review.
b) Please explain the sequencing of the remaining assessments relative to detailed design and construction, and why earlier completion was not feasible where applicable.
c) Please confirm whether the assessed area covers the final alignment, station, access areas and temporary workspaces. Explain how additional lands will be assessed before disturbance.
d) Please identify the construction exclusion areas and controls that will prevent disturbance before the applicable archaeological requirements are satisfied, including any cemetery-related investigation areas.

Staff-8

Reference: Exhibit F, Tab 1, Schedule 1, paragraph 11; Attachment 1, Table 1-1 and Appendix A7.

Preamble:

Enbridge Gas filed a record of environmental review correspondence and a table identifying potential permits and approvals for the Project. OEB Staff seeks an update on comments received from Ontario Pipeline Coordinating Committee (OPCC) members and other relevant reviewing or approval authorities, including municipalities; the disposition of those comments; and the status of required permits and approvals. OEB Staff also seeks clarification of any resulting changes to the Environmental Report, design or mitigation.

Question(s):

a) Please provide an updated issues-response matrix identifying outstanding comments from OPCC members and other relevant reviewing or approval authorities, including municipalities, together with Enbridge Gas's responses, resolution status and next steps.
b) Please distinguish matters confirmed as resolved by the relevant authority from matters Enbridge Gas considers addressed but for which confirmation remains outstanding.
c) Please update Table 1-1 to identify required permits and approvals, their status, anticipated receipt dates and the construction activities dependent on them.
d) Please identify changes to the Environmental Report, design or mitigation resulting from the review and explain whether further circulation or review is required.

ISSUE 5.0: ROUTE MAP AND FORM OF LANDOWNER AGREEMENTS

Staff-9

Reference: Exhibit G, Tab 1, Schedule 1, paragraphs 1, 2, 5 and 8; Attachment 3.

Preamble:

Enbridge Gas stated that permanent easements may be required and that temporary working areas will be identified with assistance from the construction contractor. Enbridge Gas also stated that it would obtain the required land rights before construction and filed a list of directly affected landowners. OEB Staff seeks an update on the land requirements and acquisition status.

Question(s):

a) Please update the land requirements for each pipeline segment and the injection station, distinguishing permanent easements, temporary workspace, access rights and use of public road allowances.
b) For each identified requirement, please provide the parcel identifier, intended use, approximate dimensions, agreement or authorization required, negotiation status and anticipated acquisition date, with protections for personal information as required in accordance with the OEB's Practice Direction on Confidential Filings.
c) Please identify requirements that remain undetermined and explain when and how they will be finalized.
d) Please summarize outstanding landowner concerns, the proposed approach to resolution, and whether any could require changes to the alignment or construction arrangements.

Staff-10

Reference: Exhibit F, Tab 1, Schedule 1, Attachment 1, Page 121-122 and "MCalande_Redacted - Letter of Comment_20261019_EN", dated October 19, 2026, pages 1-2, and Exhibit G, Tab 1, Schedule 1, Attachment 3.

Preamble:

Enbridge Gas filed a route assessment and a list of directly affected landowners. The October 19, 2026, letter of comment raises concerns about construction adjacent to the landowners' property and potential access requirements. OEB Staff seeks clarification of when the property and associated land requirements were identified and whether the filed mapping and proposed agreements accurately reflect the construction footprint.

Question(s):

a) Please confirm whether the landowners who wrote the October 19, 2026, letter of comment were identified before filing and whether their property is included in the filed landowner list. Provide the dates of identification, initial notification and substantive engagement.
b) If the landowners were not identified before filing, explain why and describe how potentially affected properties were identified. If they were identified, explain how the potential land requirements were reflected in the filed evidence.
c) Please provide a site-specific drawing showing the alignment and property boundaries in relation to the property addressed in the October 19, 2026, letter of comment, including any permanent or temporary workspace and access proposed on or adjacent to the property.

i. Please confirm whether entry onto the property is required and, if so, identify the purpose of entry and the agreement or authorization proposed.

d) Please identify any changes since filing in the proposed alignment, construction footprint or access arrangements affecting the property addressed in the October 19, 2026, letter of comment, and explain the reason for each change and whether the filed landowner list, mapping or agreement documentation requires updating.
e) Please confirm whether Enbridge Gas has responded in any way to date to the issues and concerns raised in the October 19, 2026, letter of comment or any other concerns raised by these particular landowners. If so, please explain Enbridge Gas's response including any planned mitigation measures.
f) Please confirm whether Enbridge Gas provided the landowners with a French-language version of any proposed land-use, easement, temporary workspace, access or other agreement, or any other project-related document.
    i. Please identify the documents provided in French and the dates they were provided.
    ii. Please also identify any substantive communications or engagement with the landowners that were conducted in the French language, including the dates and nature of those communications. If no French-language agreements, documents or communications were provided, please explain.

Staff-11

Preamble:

The Project is located in an area with a Francophone population. OEB Staff seeks to understand whether Enbridge Gas considered the language needs of potentially affected landowners and communities in planning and conducting consultation and engagement for the Project.

Question(s):

a) Please explain whether Enbridge Gas considered providing French-language communications, consultation or engagement for the Project and, if so, describe how French-language needs were identified and addressed.
b) Please identify whether Enbridge Gas communicated in French with any potentially affected landowners, including through written correspondence, phone calls, and if any information sessions, open houses, meetings or other consultation activities were conducted in French or offered French-language services or materials. If so, please describe the nature and timing of those communications.

c) Please identify any Project information, notices, consultation materials, proposed land-use or other agreements, maps, presentations or other materials that were provided or made available in French to potentially affected landowners or members of the public.

ISSUE 6.0: INDIGENOUS CONSULTATION

Staff-12

Reference: Exhibit H, Tab 1, Schedule 1, paragraph 4; Attachment 2, page 4; Attachment 3.

Preamble:

Enbridge Gas stated that the consultation record would be submitted to The Ministry of Energy and Mines (the Ministry) on or shortly after filing the application. The delegation letter filed by Enbridge Gas requests submission before applying for leave to construct. Enbridge Gas also stated that the Ministry's opinion would be filed when received.

Question(s):

a) Please confirm if and when the consultation record and subsequent updates were submitted to the Ministry and explain the difference between the submission timing described in the application and the delegation letter.
b) Please provide the Ministry's letter of opinion, if received and not already filed. Otherwise, please indicate when Enbridge Gas expects to receive a letter of opinion from the Ministry.
c) Please update the evidence with any Crown direction or correspondence between the Ministry and Enbridge Gas since the application was filed regarding the Ministry's review of Enbridge Gas's consultation activities, including how any additional Crown direction has been addressed and whether the Ministry's review encompasses the updated Project description, revised Environmental Report, and consultation undertaken after August 12, 2026.

Staff-13

Reference: Exhibit H, Tab 1, Schedule 1, Attachment 2, Page 1 to 4

Preamble:

The Ministry identified five Indigenous communities or representative groups that Enbridge Gas should consult in relation to the Project. Enbridge Gas filed an Indigenous Consultation Report and consultation record describing consultation activities up to August 12, 2026. OEB Staff seeks an updated record of consultation activities, concerns raised, responses provided and outstanding commitments, as well as further information

regarding capacity funding, potential adverse impacts on Aboriginal or treaty rights, and accommodation.

Question(s):

a) Please provide an updated Indigenous Consultation Report covering August 12, 2026, through the date of the response, identifying:
   i. Consultation activities and correspondence with each community or representative group.
   ii. Concerns or requests raised and Enbridge Gas's responses.
   iii. Outstanding commitments, proposed next steps and anticipated completion dates.
b) In updates to Attachment 5 and 6, for each Indigenous community or representative group, please identify whether capacity funding was offered, requested, accepted and provided by Enbridge Gas to date, and describe the activities supported by any capacity funding provided.
c) Please file a form of the Capacity Funding Agreement that was executed as part of the Indigenous consultation.
d) Please identify any concerns raised regarding the availability, amount, timing or terms of capacity funding and explain how Enbridge Gas responded.
e) Please identify any Aboriginal or treaty rights that a consulted Indigenous community or representative group has indicated may be adversely affected by the Project, the potential adverse effects identified, and the measures proposed or implemented by Enbridge Gas to avoid, mitigate or otherwise address those effects.
f) Please identify any accommodation measures that Enbridge Gas has proposed, committed to, agreed to or implemented in response to concerns raised through the Indigenous consultation process, including the community or representative group to which each measure relates and its implementation status.

Staff-14

Reference: Exhibit H, Tab 1, Schedule 1, Attachment 5, pages 1 and 2; Attachment 6, pages 5 and 6, entries 1.19-1.20.

Preamble:

Enbridge Gas identified outstanding recommendations from the Algonquins of Ontario concerning wildlife and culturally important species in its consultation summary. The consultation log filed by Enbridge Gas records recommendations concerning Butternut and Black Ash trees, as well as grassland birds and bat habitat, and indicates that a response was being prepared as of the record's cutoff date.

Question(s):

a) Please provide the written response and subsequent correspondence addressing these recommendations, where not already filed.
b) For each recommendation, identify whether it was accepted, modified or not adopted, explain the rationale, and identify resulting changes to design, mitigation or monitoring.

Staff-15

Reference: Exhibit H, Tab 1, Schedule 1, Attachment 5, pages 2 and 3; Attachment 6, pages 11 and 14, entries 2.21-2.32.

Preamble:

Enbridge Gas filed a consultation log recording that the Algonquins of Pikwàkanagàn First Nation advised that comments would not be available by the requested deadline, sought capacity funding and experienced document-access difficulties. The log records that an updated access link was provided on August 12, 2026. Enbridge Gas's consultation summary identifies no outstanding concerns while acknowledging the community's interest in commenting on the updated report. OEB Staff seeks clarification of the status of that review.

Question(s):

a) Please confirm when the community and its technical advisers successfully obtained access to the complete updated review materials.
b) Please provide the outcome of the proposed August 13, 2026, discussion and the status of any further discussions.

Staff-16

Reference: Exhibit H, Tab 1, Schedule 1, paragraph 3; Attachment 2, pages 2 and 4; Attachment 5, pages 3 and 4.

Preamble:

Enbridge Gas's consultation summary indicates that Kitigan Zibi Anishinabeg had not responded to outreach efforts. OEB Staff seeks clarification regarding the status of consultation and Enbridge Gas's efforts to confirm that its communications are reaching the appropriate contact.

Question(s):

a) Please update the evidence on Enbridge Gas's consultation efforts since the filed consultation log and confirm whether Enbridge Gas undertook any follow-up or used any additional or alternative methods to contact the Kitigan Zibi Anishinabeg.
b) Please also describe any steps taken to confirm receipt of the outreach and to verify that the appropriate contact information was being used.

Staff-17

Reference: Exhibit H, Tab 1, Schedule 1, paragraph 3; Attachment 2, pages 2 and 4; Attachment 5, pages 3 and 4.

Preamble:

Enbridge Gas filed a delegation letter which contains a table listing five communities or representative groups while its discussion of consultation depth also names Kawartha Nishnawbe First Nation.

Question(s):

a) Please explain whether clarification was obtained from the Ministry concerning Kawartha Nishnawbe First Nation which is named in the consultation depth discussion. Provide the clarification and confirm the applicable consultation list.
b) Please confirm if Enbridge Gas has conducted any consultation activities with Kawartha Nishnawbe First Nation and if so, provide details in an updated Indigenous Consultation Report.

IEP RELATED QUESTION

Staff-18

Reference: OEB CEO Policy 2026-01 and Energy for Generations, Ontario's Integrated Plan to Power the Strongest Economy in the G7 (June 2025) (IEP).

Preamble:

OEB CEO Policy 2026-01 provides that OEB staff shall identify the portions of the IEP that are relevant to the matters in issue in a proceeding.

Question(s):

a) Please identify any portions of the IEP that Enbridge Gas considers relevant to this application and explain their relevance.