

ENBRIDGE GAS INC.
Answer to Interrogatory from
Building Owners and Managers Association of Greater Toronto (BOMA)

Reference: Exhibit C1, Tab 2, Schedule 1, p31

Question:

- (a) Have the April 2018 federal methane reduction regulations come into force? Please provide a copy, or a link to where the regulations can be found. What steps are Union and EGD taking to comply with the regulations?
- (b) Please confirm that any revenue from the sale of buildings or facilities in 2019 will accrue to the ratepayers. Does either EGD or Union intend to sell land or facilities in 2019? Which ones?

Response

- a) Environment and Climate Change Canada (“ECCC”) published the final “Regulations Respecting the Release of Methane and Certain Volatile Organic Compounds (Upstream Oil and Gas Sector)” (the “methane regulation”), to reduce methane emissions from Canada’s Oil and Gas Sector in Canada Gazette, Part II, on April 28th, 2018. The methane regulation applies to the upstream oil and gas sector which includes the transmission and storage segment of the natural gas industry, but not the distribution segment. A copy of the regulation can be found at <https://laws-lois.justice.gc.ca/eng/gregulations/SOR-2018-66/>. Beginning in 2020, the following regulatory requirements will come into force:
 - Annual measurement requirements and emission limits for reciprocating compressor unit rod packing and centrifugal compressor unit seals
 - Leak Detection and Repair (“LDAR”) requirements for natural gas storage and transmission facilities

Enbridge Gas is in the process of developing a plan to ensure compliance with the 2020 regulatory requirements, for legacy Union and legacy EGD facilities. Key steps in the plan include preliminary testing (2018/2019) of rod packing and seal emissions from compressor units in order to identify potential compliance issues and development of a resource plan and schedule to meet the new LDAR requirements for 2020. Future work

will include an assessment of high bleed pneumatic devices and other venting sources in order to ensure compliance with additional regulatory requirements coming into force in 2023. Enbridge, in conjunction with the natural gas industry, is also continuing consultation with ECCC, to provide further clarity on the implementation of the regulatory requirements.

Based on testing completed to date, EGD has developed and began implementing plans in order to meet the regulated emission rate for some of its large bore reciprocating compressors.

b) Not confirmed. At present, Enbridge Gas does not have any planned land or facility sales for 2019.