Emergency Preparedness and Response Program

Enbridge Gas Inc. operating as Union Gas
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Section 12 - District Specific
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2.1 Union Gas Emergency Preparedness and Response Program

Safety and Operational Reliability is our Number 1 priority as an organization. Everything else that we do is built on this foundation. This means that we:

- Relentlessly ensure the safety of our communities, customers, employees, contractors and partners
- Take a proactive approach to identifying and preventing safety issues
- Take immediate action when a safety issue is identified
- Continually see ways to improve safety performance

All incidents that occur on facilities owned or operated by Union Gas have the potential to impact several departments within the Company. Therefore, it is essential that all emergency situations be quickly assessed and addressed. The Company has considerable resources that can be, if necessary, mobilized to provide direction and support to personnel during emergency situations.

In addition, the Emergency Preparedness and Response Program provides guidance and direction in the areas of training and competency, exercise development and conduct, post incident reviews and overall plan evaluation to ensure that the plan continues to meet its primary goal of protecting people, the environment and property.

This manual provides:

- Guidelines for immediate investigation and reporting of Operational and Security emergencies
- Guidelines for immediate appropriate action to:
  - protect the public, our employees, company facilities, and the environment
  - prevent or minimize property damage
  - maintain continuity of supply
  - re-establish gas supply should an outage occur
  - protect the Enbridge and Union Gas brand
- Guidelines for effective internal and external information sharing
- Guidelines and instructions for exercise development and conduct
- The Emergency Response Organization structure, Roles and Responsibilities
- Training and competency requirements for emergency response personnel and duty managers
- Criteria for post incident reviews
2.2 Crisis Management


The organization is made up of the following:

- Enterprise Crisis Management Team (CMT)
- Incident Support Team (IST)
- Incident Management Team (IMT)
- Field Response Team
- Emergency Operations Center (EOC) - Incident Support to the District
- District Emergency Operation Center (DEOC)
- Incident Command Post (ICP)
2.2.1 Incident Command System (ICS)

ICS is a command and control system delineating job responsibilities and organizational structure for the purpose of managing day-to-day operations for all types of emergency incidents. The benefits of ICS are as follows:

- Meets the needs of incidents of any kind or size (i.e. flexible and scalable)
- Allows personnel from a variety of agencies to meld rapidly into a common management structure
- Provides logistical and administrative support to operational staff
- Is efficient and effective by avoiding duplication of efforts
- Is interdisciplinary and organizationally flexible

The following ICS features and principles are included in this Emergency Preparedness and Response Plan:

- Standardization
  - Common terminology
- Command
  - Establishment and transfer of command
  - Chain of Command and Unity of Command
- Planning/Organizational Structure
  - Management by Objectives
  - Incident Action Plan
  - Modular organization
  - Manageable span of control
- Facilities and Resources
  - Comprehensive resource management
  - Incident locations and facilities
- Communications/Information Management
  - Integrated communications
  - Information and intelligence management
- Professionalism
  - Accountability
  - Dispatch/Deployment
2.2.2 Incident Action Plan

The incident action planning process provides a tool to synchronize operations at the incident level and ensures that incident operations are conducted in support of incident objectives. The Incident Action Plan (IAP) formally documents incident objectives and the response strategy defined by incident command during response planning. It contains general tactics with assigned accountabilities to achieve goals and objectives within the overall strategy, for a given operational period.

For Union Gas, there are five primary objectives that are relevant to most of the emergency incidents we encounter:

- Protect the public, employees, property and the environment
- Maintain continuity of gas supply
- Safely re-establish gas supply
- Protect the Union Gas and Enbridge brand
- Prevent or minimize property damage

In addition to these primary objectives, other objectives may be developed as necessitated by an emergency incident. IAP templates are available for reference during an emergency incident and can be found on the Source (Emergency Preparedness and Response page). A prefilled template has also been provided that includes the common primary objectives described above, along with the various strategies and tactics to accomplish the objectives. IAP's are required to be uploaded to the Incident Management Tool (IMT) when completed and as they are updated.

2.2.3 Incident Management Tool (IMT)

The IMT is an application/communication tool that provides senior leadership and other affected individuals (internal) with both summary and detailed information regarding an incident, as well as the communications required to keep affected customers and stakeholders informed. The IMT contains the following tabs/pages:

- Incident Summary
- Incident Status
- Resources
- Communications
- Agency/Regulatory Notifications
- Media/Stakeholder Inquiries
- Incident Files

Access to the IMT is controlled and managed by the Supervisor, Emergency Response Planning and System Security.
2.3 Enbridge Health and Safety Principles
2.4 Integrated Management System (IMS)

**Scope:** The Integrated Management System (IMS) provides the governance structure for Union Gas Operational and Environmental Health and Safety Programs. As a disciplined comprehensive system, the IMS encompasses all aspects of design, procurement, construction, operation, maintenance and decommissioning of our assets. The IMS Programs apply to all functions within the Distribution Operations, Engineering, Construction, and Storage Transmission Operations and associated stakeholders. The Environment, Occupational Health and Personal Safety Programs apply to all functions within the Union Gas organization.

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<td>8.0 Documents &amp; Records</td>
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*Figure 2.4.1 Integrated Management System Framework*
2.5 Program Maintenance

The Supervisor, Emergency Response Planning and System Security, will review the Emergency Preparedness and Response Program processes and procedures a minimum of once per year. Any suggestions for changes can be submitted through the Distribution Operations Action Request (DOAR) Form. The DOAR Process will be followed to resolve all issues.

The Supervisor, Emergency Response Planning and System Security, will also seek input from various sources, such as the Utility Services Field Supervisor Committee and Utility Services Committee, as well as consider post incident and exercise reviews to identify improvements to the Emergency Preparedness and Response Program.

All changes to the manual are documented and retained by Technical Documentation Support (TDS). TDS provides a change log (What’s New and Updated) to each manual holder for each manual distribution.

2.6 Manual Distribution

Each Emergency Preparedness and Response Program is numbered and assigned to an individual manual holder. Manual holders are responsible for updating their manual and ensuring supersede information is recycled. Manuals that reside in the EOC and DEOCs must be updated when the update is distributed. The Supervisor of Emergency Response Planning and System Security is responsible for the assignment and distribution of all manuals, and reviews the distribution list annually.
2.7 Exercise Program

The purpose of the exercise program is to validate emergency plans and training; familiarize personnel with roles and responsibilities; practice the skills of emergency response; test equipment, procedures and protocols; identify opportunities to improve emergency plans; develop working relationships with other emergency response organizations; create confidence in the emergency response organization and the plan; maintain awareness of the plan with Company personnel.

There are four basic types of emergency response exercises:

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<th>Purpose</th>
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<td>Drill</td>
<td>Practice certain skills with hands on activities that test specific elements of the emergency.</td>
<td>Regional Director/District Manager/STO Manager</td>
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<td>Table Top</td>
<td>Round table discussions of potential emergency situations developed to evaluate elements of the Emergency Response Plan and structured to meet the specific objectives.</td>
<td>Regional Director/District Manager/STO Manager</td>
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<tr>
<td>Functional Simulation</td>
<td>An actual incident is staged and the district or STO business unit is mobilized to test the interaction between the emergency operation center and incident command post and to test the adequacy of response plans and resources.</td>
<td>Regional Director/District Manager/STO Manager</td>
</tr>
<tr>
<td>Full Scale Simulation</td>
<td>An actual incident is 'staged' and the organization mobilized to test as many elements of the Company's emergency response organization. <em>Note: Exercise may include outside agencies and a Simulation Centre is used to emulate the outside world.</em></td>
<td>Supervisor, Emergency Response Planning and System Security</td>
</tr>
</tbody>
</table>

* All exercises will be followed up with a documented post-exercise review.

The Head Office Emergency Operating Centre and all District Emergency Operating Centres shall conduct at least one exercise annually. The Head Office Emergency Operating Centre shall conduct a Full Scale Simulation once every three (3) years.

At the start of each calendar year the Supervisor of Emergency Response Planning and System Security will meet with the Supervisors Regional Support to review the previous year’s exercise results and discuss the current years scheduled exercises.
The Supervisor or Sr Advisor, Emergency Response Planning and System Security will:

- Observe a minimum of three (3) District/STO exercises per year
- Review all district exercise plans prior to the execution of the exercise
- Review the action items from the exercise debrief and confirm with the relevant manager that items have been completed

The Sr Advisor, Emergency Response Planning and System Security will develop, maintain and publish an exercise schedule with a six (6) year continuing outlook. The schedule will include exercises for each District, STO, EOC and the Incident Support Team (IST). At least one Security related exercise will be assigned at the start of each year to be conducted by one of the work groups.

The Supervisor or Sr Advisor, Emergency Response Planning and System Security will review each final exercise report and update the Emergency Preparedness & Response Plan as required.

### Exercise Schedule

<table>
<thead>
<tr>
<th>Exercise Type</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
<th>2023</th>
<th>2024</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Functional Simulation</strong></td>
<td>Waterloo North East Bright</td>
<td>London Eastern Dawn</td>
<td>Hamilton North West Windsor Parkway</td>
<td>Hamilton North West Windsor Lobo</td>
<td>London Eastern Hagar</td>
<td>Hamilton North West Windsor Hagar</td>
</tr>
<tr>
<td><strong>Full Scale Simulation</strong></td>
<td>Corporate</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
2.8 Public Awareness and Continuing Education Program

The recipients of our Public Awareness and Continuing Education (PACE) program are Fire Departments, Municipalities, Local Authorities and the general public that reside within an Emergency Planning Zone (EPZ) of our 30% SMYS pipelines. These groups are educated, using the training aids listed below, on the location of the pipelines, potential emergency situations involving the pipelines, and the safety procedures to be followed in case of an emergency.

### Public Awareness Continuing Education (PACE) Program

The recipients of our PACE program are Fire Departments, Police, Local Authorities, Municipalities, and the general public that reside within an Emergency Planning Zone (PZ) of a 30% SMYS pipeline. These groups are educated, using the training aids listed below, on the location of the pipeline, potential emergency situations involving the pipeline, and the safety procedures to be followed in case of an emergency.

<table>
<thead>
<tr>
<th>Training Aids</th>
<th>Length</th>
<th>Intended Audience</th>
<th>Frequency</th>
<th>Program Delivery Accountability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Gas Awareness for Firefighters Presentation</td>
<td>1 1/2 hour</td>
<td>Fire, Municipalities</td>
<td>Every 3 years</td>
<td>Regional Director/Field Supervisor Manager</td>
</tr>
<tr>
<td>Critical Facilities Map</td>
<td>n/a</td>
<td>Local Authorities</td>
<td>Every 5 years</td>
<td>Regional Director/Field Supervisor Manager</td>
</tr>
<tr>
<td>Emergency Communication meetings</td>
<td>1 hour</td>
<td>Residents Within EPZ</td>
<td>Every 5 years</td>
<td>Regional Director/Field Supervisor Manager</td>
</tr>
<tr>
<td>Safety &amp; Emergency Information for Residents adjacent to pipelines Booklet</td>
<td>n/a</td>
<td>Fire, Municipalities</td>
<td>Every 1-3 years</td>
<td>Sr Advisor, Emergency Response Sr Advisor, Emergency Response</td>
</tr>
</tbody>
</table>

1. The Supervisors Regional Support and the System Operation and Compression Manager (STO) are accountable for the overall completion of the PACE Program within their areas.
2. Districts and STO should work together to determine which work group will complete awareness sessions in areas of overlap.
3. Field Supervisor Advisor STO Manager: Ensure the PACE Database is updated after completion of awareness training to ensure tracking and reporting is effective and program is compliant.
4. Maps of 30% SMYS pipelines should be provided to the Municipal Certified Emergency Management Coordinator - CEMC (in some municipalities it may be the Fire Chief)
5. Emergency Communication meetings with Local authorities should include Municipal officials, Police, MTO, MNR, MOE, Local Conservation Authorities and TSSA
6. Requests for training aids can be made to the Sr Advisor, Emergency Response Planning & System Security.
7. EPZ Resident information for NEB regulated pipelines is provided annually to local fire departments who would respond to a pipeline incident.
2.9 CGA Mutual Assistance Agreement

The purpose of this agreement is to provide a ready mechanism for Canadian natural gas industry companies to assist each other during emergencies.

This assistance could include personnel support, equipment and consumable supplies, or other services. The Agreement is available for assistance in all types of emergencies including those caused by natural disasters, equipment failures or wilful damage. The Agreement is intended to improve the timeliness and/or effectiveness of response to emergency events by clarifying the terms, conditions, and availability of mutual assistance in advance of potential emergencies.

A copy of the CGA Mutual Assistance Agreement (CGAMutual AsstFinal) can be found on the Emergency Response Fileshare, in the folder titled Mutual Aid. Union Gas also has a Mutual Assistance Agreement with Energy Fundamentals Group (Rainy River, ON). In addition, Union Gas is a participant of the American Gas Association (AGA) and Northeast Gas Association (NGA) Mutual Assistance Agreements.
2.10 Training and Competency

2.10.1 Utility Services

Union Gas utilizes a Competency and Assessment Program (CAP) for all employees and contractors who perform a covered task related to the full lifecycle of a pipeline e.g., design construction, operation, maintenance and abandonment. The frequency of the assessments is based on a risk assessment. With respect to contractors, Union Gas will conduct the competency assessment for welding, plastic fusions, and tapping and stopping. All other tasks are assessed by qualified assessors of the contractor. The Union Gas Quality Assurance department will audit the contractors for compliance to CAP annually.

The responsibilities and qualifications for the primary and secondary responder for the Utility Services Representative role are described below:

Primary Responder Responsibility:

- To assess the situation, perform whatever duties are required to bring the incident under control, and determine repair requirements

Qualified Individuals:

- Fully qualified USRs
- USR in progression who has acquired both the G2/GUT2 and GPI certifications and has successfully completed the USR training program
- HVAC contractor trained in emergency response by Union Gas
  - Limited scope and ongoing competency assessments (CAP)

Secondary Responder Responsibility:

- To provide assistance to the primary responder
- To perform all tasks they are qualified to perform

**NOTE:** A secondary responder cannot take the place of a primary responder unless they are qualified to do so

Qualified Individuals:

- Anyone qualified as a primary responder
- USR in training who has acquired either the G2/GUT2 or GPI certification and has successfully completed the associated training and progression exam
- Fire Department
2.10.2 District Duty Manager

Duty Manager Criteria

- The Duty Manager is on call 24 hours/day, seven (7) days/week and must be available by cell phone.
- The Regional Director/District Manager must approve the District standby schedule to ensure an adequate number of qualified resources exist. The Duty Manager position is filled according to the standby schedule posted in London Dispatch / Dawn MCR.
- The Duty Manager resources are selected from the following, but not limited to Field Supervisors Utility Services, Advisors Regional Support, Field Supervisors Technicians, Construction & Growth Supervisors, District Engineers, Construction Superintendents, and Advisors Construction Project.

All Union Gas managers or supervisors who participate on the Duty Manager rotation must complete the following training.

**NOTE:** Exemptions are permitted based on previous training or roles and must be approved by the Regional Director/District Manager.

<table>
<thead>
<tr>
<th>Description</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Core Fundamentals – Topics include: Safety, Meters &amp; Regs, B149 Code basics; Mapping and Locating, Plant Damage Prevention; C&amp;M Planning, Valves, Pipeline Maintenance and Corrosion</td>
<td>5 days</td>
</tr>
<tr>
<td>Inside &amp; Outside Leak/Odour Investigation - Topics Include: Gas Scope, odour calls and inside/outside leak investigation protocol.</td>
<td>3 days</td>
</tr>
<tr>
<td>Utilization, B149 Code - Topics Include: Code inspections and infractions</td>
<td>1 day</td>
</tr>
<tr>
<td>Stopping &amp; Tapping - Topics include: Introduction to stopping and tapping equipment, processes, isolation procedures and safety practices. Includes use of T Machine, no-blow stop changer and Mueller D4.</td>
<td>3 days</td>
</tr>
<tr>
<td>GIS – Tutorial on the Union Gas mapping system</td>
<td>Computer Based Training</td>
</tr>
<tr>
<td>Emergency Response Plan (DEOC and ICP) - Topics include: the fundamentals of ICS as applied at Union Gas, an overview of the Emergency Preparedness Plan as well as roles and responsibilities.</td>
<td>2 days</td>
</tr>
<tr>
<td>Media Training - Topics include: preparation of managers to deal effectively with the media, acting as the spokesperson at an incident site.</td>
<td>1/2 day</td>
</tr>
</tbody>
</table>
2.10.3 Head Office Emergency Manager

Emergency Manager Criteria

- Must be a current Distribution Operations Process Manager/Supervisor/Advisor, Operations Support and Administration Manager/Supervisor/Advisor, or Operations Support Process Manager/Supervisor/Advisor. Other eligible roles are reviewed on an individual basis.

- Previous District or STO field or management experience

- Ability to effectively absorb and apply knowledge in a rapidly changing crisis management environment; able to think on their feet

- Strong leadership skills

- Demonstrated analytical and problem resolution skills

- Ability to participate on the Head Office Emergency Manager Standby rotation

All Union Gas managers/supervisors/advisors who participate on the Head Office Emergency Manager rotation must complete the following training.

<table>
<thead>
<tr>
<th>Description</th>
<th>Length</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inside &amp; Outside Leak/Odour Investigation</td>
<td>3 days</td>
</tr>
<tr>
<td>Security Management Awareness (CBT)</td>
<td>1/2 hour</td>
</tr>
<tr>
<td>Emergency Response Plan &amp; Media Training</td>
<td>3 days</td>
</tr>
<tr>
<td>EOC Training</td>
<td>2 hours</td>
</tr>
</tbody>
</table>
2.11 Program Evaluation and Performance Measurement

The Emergency Preparedness and Response Program will be audited by the Internal Audit department at least once every three (3) years.

There is an Ontario Energy Board requirement to respond to 90% of emergencies within 60 minutes. Union Gas has established a minimum internal requirement to respond to 95% of emergencies within 60 minutes with a target of 98%. All emergencies, Priority 1 calls, are reviewed with respect to response times and a follow up is required by the supervisor accountable for all responses that exceed 60 minutes. This information is tracked in a Priority One database for reporting purposes. In addition, priority one response is a key performance indicator on the Distribution Operations Scorecard.

Emergencies meeting the criteria to be reported to the Head Office Emergency Manager are captured in the EPASS database. These emergencies are reviewed quarterly by a committee chaired by the Supervisor, Emergency Response Planning and System Security. The committee is comprised of the following roles:

- Director, Distribution Operations
- Director, Engineering
- Manager, Workload Planning
- Supervisor, External or Internal Communications
- Senior Advisor, Emergency Response Planning and System Security
- All individuals participating on the Head Office Emergency Manager rotation

This committee also reviews a summary of all incident reviews and exercise results and makes recommendations for improvements to the Emergency Preparedness and Response Program as well as supporting processes.

2.12 Management Review

The Emergency Preparedness and Response Program is reviewed annually by the Integrated Management System (IMS) Steering Committee as well as by the Union Gas Executive Leadership Team. The purpose of this review is to ensure the EPRP remains suitable, adequate and effective.
Section 3 - Organization

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3.1 Union Gas Emergency Response Organization

This section describes the Emergency Response Organization for Union Gas. The Organization is made up of the following elements.

3.1.1 Enterprise Crisis Management Team (CMT)

The Enterprise Crisis Management Team will be notified whenever the Union Gas EOC is fully activated. The Business Unit Leader or designate is responsible for receiving incident notification and situation updates from the Union Gas Crisis Leader (IST). This information will be reported to Enbridge Senior Leadership. Functional Support will be activated depending on the nature of the incident.

3.1.2 Union Gas Incident Support Team (IST)

The Union Gas Crisis Incident Support Team (IST) will be activated when an incident warrants a Full Readiness Level. The primary responsibility of this group is to supply senior strategic decision making during an emergency situation. The Incident Support Team receives incident updates and recommendations from the EOC and communicates directly with the Business Unit Leadership. The group is led by the Union Gas Crisis Leader.

3.1.3 Union Gas Emergency Operations Centre (EOC)

The Union Gas Emergency Operations Centre (EOC) manages large scale emergency operations. It will be mobilized to provide senior decision-making and support to District level emergency operations.

3.1.4 District Emergency Operations Centre (DEOC)

The District Emergency Operations Centre serves as a management facility for District Level emergency operations. It will be mobilized to support field response activities.

3.1.5 Incident Command Post (ICP)

The Incident Command Post (ICP) controls all Union Gas field operations at an emergency site. The ICP is staffed by Union Gas personnel and contractors present at an emergency site. These individuals work under the direction and control of the Incident Commander, and work closely with emergency services personnel from the municipality in which the emergency is occurring.
Figure 3.1: Emergency Response Organization

**NOTE:** The Enterprise CMT will be notified when the Union Gas EOC is fully activated or when the incident dictates their notification. The Union Gas EOC Incident Response Team may be brought in to assist in emergency operations depending on the incident details.
Figure 3.2: Crisis Management Structure

Enterprise
CMT
Policy Advice & Support
Incident Notification
Situational Updates

Union Gas
Strategy Leader, Crisis Leader,
and Crisis Advisors
(IST)

EOC Director

DEOC
Policy Advice, Direction & Support
Incident Notification
Situational Updates

Core Team
EOC Leader
Operations Coordinator
Logistics Coordinator
Engineering Support Coordinator
Distribution Planning Coordinator
Communications Coordinator
Gas Control Coordinator
Planning & Dispatch Coordinator
Contact Centre Coordinator

Additional Resources
Sales & Marketing
Legal
Engineering Services
EHS Services
Human Resources/Labour Relations
Corporate Real Estate Services
Technology & Information Services (TIS)
Insurance Services
Security
Lands

Incident Response Team
Incident Response Team Leader
Technical Support
Municipal Relations
Media Relations
Logistical Support
Financial Support
Other SME’s as needed

Policy Advice,
Direction & Support
Incident Notification
Situational Updates

Union Gas
Strategy Leader, Crisis Leader,
and Crisis Advisors
(IST)
### 3.2 The Union Gas Incident Support Team (IST)

**Activation:**
- The IST will be activated in the event of a Full Readiness Level incident or whenever senior strategic decision making during an emergency situation is required.

**Function:**
- Understand and approve where necessary, the plans to ensure the immediate safety and security of the public, our employees, our contractors and the incident site, and the plans to sustain them.
- Set long term goals for incident response (1 to 5 days out)
- Make executive decisions, when required, for example the continuance of gas supply
- Provide advice and support to the EOC
- Protect the image of the Corporation i.e. approval of external media releases, ensure adequate communications to our senior external stakeholders, government officials, regulators, etc.
- Approve the issuance of the ONGA Natural Gas Shut-off and Restoration video to external media
- Liaise with Enterprise CMT

**Key External Contacts:**
- Senior Industry Leaders i.e., Trans Canada, CGA etc.
- Ontario Energy Board (OEB)
- President and CEO TSSA
- Senior Municipal, Provincial and Federal government contacts
- All levels of media as appropriate

**Equipment:**
The following equipment should be located in, or be quickly made available to the IST:
- Telephones including conference call phone
- Computer projector
- Network connections
- Whiteboard
- Copies of:
  - Union Gas Emergency Preparedness and Response Plan
  - Crisis Management Plan
- Basic stationery supplies
Set-up: The following procedure is to be followed when activating the IST:

- The Crisis Leader will ask their Admin Support to notify the members of the IST to report to the room or call in
- The Enterprise CMT will be notified of the incident as per the current criteria
  - A confirmed hostile action, or a suspect event(s) or threat against a Union Gas facility, the gas industry or a community within which Union Gas operates, which has been reviewed and found to be credible
  - An incident at or near a Union Gas facility which results in a significant threat to health or safety (whether it be employee or public) or to ongoing facility operations
  - An incident which has potential financial impacts of US$1 million dollars or more
  - An incident which will require unplanned resource support to Union Gas from other areas of the organization
  - An incident requiring significant interface with/or on-ground presence from regulatory/civil authorities
  - An incident which has or may result in activation of the Union Gas Incident Support Team crisis management organization or business continuity plans. Notification of this action must be made to the Business Unit Leader within sixty (60) minutes of the decision
  - An incident which may generate media interest beyond the local level/area
- Once the required conference call links have been established, the group will be updated by the EOC Director

Staffing:
3.2.1 **Strategy Leader (IST)**

**Assigned** - President, Utilities and Power Operations Enbridge Gas Inc.

**1st Alternate** – Vice President as assigned

**Role** - Approve the appropriate corporate strategy during a major emergency.

**Responsibilities**

- Provides strategic direction to the Incident Support Team.
- Primary contact for senior Federal or Provincial Regulators, senior commercial /industrial market customers and senior stakeholders involved in the emergency.
- Authorizes declaration of a Force Majeure.
- Ensures appropriate steps are taken to protect the corporate brand during the emergency.
- Ensures the Business Unit Leader is well informed of actions taken by the company and key issues.
- Approves any change in the company’s Security Threat Response Plan threat level based on recommendations from the SET Security Services.

3.2.2 **Crisis Leader (IST)**

**Location** - Incident Support Team meeting room

**Assigned** - SVP Operations

**1st Alternate** - VP Engineering

**2nd Alternate** - VP Storage and Transmission Operations

**Role** - Provide strategic leadership and policy guidance of the EOC

**Responsibilities (these responsibilities may be delegated as appropriate)**

- Decides when to activate/deactivate the Incident Support Team (IST).
- Decides on issues relative to the Emergency Response Plan.
- Approves Union Gas’ Crisis Management Strategy.
- Reports to Business Unit Leader for regular updates, as required.
- Approves EOC internal and external communications.
- Obtains updates from the EOC Director.
- Ensures post-incident critique is completed.
- Participates in periodic emergency response plan drills.
- Authorizes the release of the Emergency videotape “Natural Gas Emergency Shut Off and Restoration”.

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Emergency Preparedness and Response Program
Section 3 - Organization

Approver: Supervisor Emerg Resp Plng Syst Security

Issue Date: 2019-03
• Appoints an Incident Response Team Leader and other team members as required.
• Approves Incident Response Team scope, objectives, accountabilities, expected duration of deployment, and reporting relationships and communicates these details to the EOC Director.
• Conducts a transfer of command briefing for the incoming Crisis Leader.

3.2.3 Crisis Advisors (IST)

Assigned - VP Engineering,
  VP Energy Services
  VP Customer Care
  VP Business Development/ Regulatory
  VP Gas Law
  Director, Information Systems
  Director, HRBP Gas Distribution & Power
  VP Storage Transmission
  Other support leaders as deemed necessary

Role - Support the Crisis Leader

Responsibilities

• Supports the Crisis Leader in:
  • Development of longer term recovery strategies.
  • Development of external communications to large commercial and industrial market customers, senior Federal or Provincial regulators and financial institutions, etc.
  • Approval of internal communications.
  • Development of community relations communications plans.
  • Communication with the Ministry of Energy & Infrastructure if necessary.
3.2.4 Administrative Support

Role - Administrative support for the IST

Responsibilities

- Documents the events and key decisions agreed to by the IST.
- Activates conference calls between the IST and the Enterprise CMT
- Liaises with the EOC Documentation Coordinator (or designate) regarding status updates, summaries, etc.
3.3 Union Gas Emergency Operations Centre (EOC)

**Activation:**
- May be activated in the event of a Limited Readiness Level
- Activate in Full Readiness Level

**Function:**
- Understand and approve, where appropriate, the DEOC emergency response and recovery plans
- Set short-term goals for the incident response and recovery
- Coordinate Union Gas operations that may be directly involved in the emergency operation
- Provide resources and other support as needed to aid in Emergency Operations
- Serve in liaison capacity with the Union Gas IST
- Serve in a liaison capacity with specific industry or government agencies who may be involved in an emergency i.e., MOL, MOE, TSSA, Municipal officials, etc.
- Provide public and media relations resources
- Anticipate and plan for long term emergency operations i.e., additional internal support, implementation of mutual aid agreements, etc.

*Once the formal EOC is established, Gas Control will:*
- Try to maintain system integrity
- Participate in Load Shed situations

**Equipment:**
- Copies of:
  - Union Gas Emergency Preparedness and Response Plan
  - Enterprise Crisis Management Plan
  - Industry Mutual Aid Agreements
  - Loadshed Plans
  - Any other plans in support of External Communication and Media Relations, Human Resources, etc.
- Whiteboard/flip charts on easel/status board
- Network Connections
- Access to printer / fax machine / photocopier
- Battery radio and clock
- Television (cable)
- Projector
- Telephones, including conference phone/cell phones
- Basic stationery supplies, Emergency Event Log pads (Form 8216b)
- Mapping (Union Gas system map, MAOP maps, Loadshed maps, Dawn Plant piping, street maps) paper and/or digital versions.
Equipment – cont’d

- Sign for “EOC in Progress” in EOC kit
- Access to emergency forms:
  - 1071 - Report of Plant Damage
  - 2761 - Preliminary Incident Report
  - 8186 - Suspicious Telephone Call Report
  - 8216b - Emergency Event Log (8 x 11 size)
  - 8205 - Incident Logistics Log
  - 8311 - Vehicle Incident Report Form
  - 8312 - Injury & Illness Report Form
  - 8313 - Environmental Incident Report Form
  - 8418 - Emergency Warehouse Order Form

Set-up:

- Notify EOC staffing
- First person to arrive will establish communication with DEOC(s)
- Open an emergency event log
- Set up workstations
- Fill in event status board
- Brief arriving EOC members and record assigned roles
- Place “EOC in Progress” on door
- Fill in coordinator, weather, repair information on laminated flip charts

Staffing:

- Crisis Leader
- EOC Director

Core Team
- EOC Leader
- Operations Coordinator
- Logistics Coordinator
- Engineering Support Coordinator
- Distribution Planning Coordinator
- Communications Coordinator
- Documentation Coordinator
- Gas Control Coordinator
- Planning & Dispatch Coordinator
- Contact Centre Coordinator

Additional Resources
- Sales & Marketing
- Legal
- Engineering Services
- EHS Services
- Human Resources / Labor Relations
- Corporate Real Estate Services
- Tech & Information Services (TIS)
- Insurance Services
- Security
- Lands

Core Team
- Incident Response Team Leader
- Technical Support
- Municipal Relations
- Media Relations
- Logistical Support
- Financial Support
- Other SME’s as needed
3.3.1 EOC Director

Location - As per 3.3

Assigned - Director, Integrity & IMS
Alternates - Regional Directors, South East, South West & North

Role - Overall control and ensure compliance of Union Gas Emergency Response Operations

Responsibilities

- Develops the overall emergency response plan strategy and submits to the Crisis Leader for approval.
- Receives notification through a Preliminary Incident Report of internal threat/incident and consults with Crisis Leader on actions required.
- Receives information on security risks from Crisis Leader and takes appropriate actions. Threat conditions are described in Section 9, Security.
- As required, informs Crisis Leader upon notification of a crisis from the District/STO, Gas Control, or other source.
- Ensures that company-wide District Duty Managers and/or Dawn MCR are aware that the EOC or a DEOC has been activated, and advises of activation requirements.
- Ensures the appropriate DEOC and ICP are notified of the Incident Response Team’s formation, scope, reporting relationship and communication protocol.
- Authorizes mobilization of the Union Gas Incident Response Team.
- Reviews and provides assistance for internal and external communications.
- Communicates with the District Emergency Operations Centre (DEOC).
- Prepares briefings for the Crisis Leader
- Conducts a transfer of command briefing for the incoming EOC Director
- Deactivates the EOC as warranted.
- Ensures that incident reports and other industry incidents and drills are distributed.
- Increases internal and external awareness of Union Gas’ emergency response plan through articles, presentations, and other communication tools.
- Maintains written record of all activities for this position.
- Directs post-incident review as required.
- Participates in periodic emergency response plan drills.
3.3.2 EOC Leader

**Location** - As per 3.3

**Assigned** - Supervisor, Emergency Response Planning and System Security

**1st Alternate** - Sr Advisor, Emergency Response Planning and System Security

**2nd Alternate** - Head Office Emergency Manager

**Role** - Coordinates all activities in the EOC

**Responsibilities**

- Staffs the EOC for limited and full activation.
  - Assigns EOC coordinator roles accordingly
  - Includes subject matter experts (Additional Resources Section 3.3.12) as required
- Communicates incident information to the EOC staff.
- Manages the operations of the EOC.
- Monitors all activities in the EOC to ensure all support groups are completing their objectives.
- Sets agenda for the conference calls.
- Assists EOC Director in setting short term and long term goals for the operation and monitors progress for completion of those goals and reports results to EOC Director.
- Advises EOC Director of any change in Readiness Levels and advises EOC staff of any Security Level changes.
- Assumes role of EOC Director when they are not in the EOC.
- During smaller incidents, this role may be combined with the Operations Coordinator at the discretion of the EOC Director.
- Conducts a transfer of command briefing for the incoming EOC Leader
3.3.3 **Operations Coordinator**

**Location** - As per 3.3

**Assigned** - Sr Advisor, Emergency Response Planning and System Security

**1st Alternate** - Head Office Emergency Manager

**2nd Alternate** - Head Office Emergency Manager

**Role** - Coordinates all activities between the EOC and DEOC(s)

**Responsibilities**

- Coordinates technical investigation of the incident, with District management.
- Reviews District-prepared scope and cost estimate for repairs.
- Assists in providing personnel for the Union Gas Incident Response Team.
- Keeps the EOC Leader informed of current activities.
- Initiates EOC response post-incident review.
- Coordinates requests for assistance from outside sources.
- Provides direction as required to the District Management.
- Assists the DEOC in coordinating ongoing activities to restore service.
- Maintains written record of all activities for this position.
- Directs post-incident review as required.
- Participates in periodic emergency response plan drills.
3.3.4 Logistics Coordinator

Location - As per 3.3

Assigned - Head Office Emergency Manager
1st Alternate - Head Office Emergency Manager
2nd Alternate - Head Office Emergency Manager

Role - Coordinates procurement of resources and supplies.

Responsibilities

- Coordinates personnel requirements from other Districts.
- Coordinates material and supply requirements.
- Liaises with DEOC Logistics Section Chief to ensure timely procurement of resources required for emergency response and site remediation.
- Works with P&D Coordinator to determine field resource capabilities.
- Maintains a current record of allocated resources.
- Keeps the EOC Leader informed of current activities and the state of Union Gas resources.
- Attends regular briefings with other EOC personnel.
- Maintains written record of all activities for this position.
- Participates in post incident reviews as required.
- Participates in periodic emergency response plan drills.
3.3.5 Engineering Support Coordinator

Location - As per 3.3

Assigned - Director, Engineering

1st Alternate - Manager, Pipeline Engineering

2nd Alternate - Manager, Station Engineering

Role - Provide engineering support services to the EOC in terms of construction, design, management of pipeline and station contractors, and material specifications.

Responsibilities

- Mobilizes Pipeline and Station Engineering Department.
- Provides initial engineering assessment for repair.
- Coordinates repair solutions with Engineering Services.
- Ensures that Incident Response Team members are dispatched to the site, as required.
- Receives information from the field and verifies the action required to correct facilities failure.
- Ensures that the required pipeline/compressor contractors are mobilized and that specialized repair materials are procured.
- Communicates with the DEOC/Incident Response Team through regular communication channels and advises the EOC Director of the status of the emergency site, including time requirements.
- Monitors emergency progress.
- Approves the recommendations of the Distribution Planning Team.
- Maintains written record of all activities for this position.
- Participates in post-incident review as required.
- Participates in periodic emergency response plan drills.
3.3.6 Distribution Planning Coordinator

**Location** - As per 3.3

**Assigned** - Manager, Distribution Planning

**1st Alternate** - Senior Technician, Distribution Planning

**2nd Alternate** - Supervisor, Engineering Drafting

**Role** - Provide system information and support to the EOC regarding options for supply and system operation capabilities.

**Responsibilities**

- Estimates the loss in system capacity caused by impairment in distribution system/district areas only. Reference 3.3.9 “Gas Control Coordinator” for system capacity issues relating to storage or transmission.

- Estimates amount of load that needs to be shed and determines where it needs to be shed.

- Works with Gas Control to estimate system “failure” if no action is taken.

- Revises load shedding requirements as the situation changes.

- Participates in post-incident review as required.

- Participates in periodic emergency response plan drills.

- Develops a report which provides a summary of System Customer and Load Totals under various conditions.

- Provides Contract Customer information and Regular Rate Demands adjusted for specific conditions.
3.3.7 Communications Coordinator

**Location** - As per 3.3

**Assigned** - Supervisor, External Communication and Media Relations

**1st Alternate** - Supervisor, Internal & Executive Communications

**2nd Alternate** - Director, Public Affairs

**Role** - Internal and external media communications. The responsibilities described below are guided by the Corporate Crisis Communications Manual, which is retained in and maintained by the Public Affairs department.

**Responsibilities**

- Establishes and implements Corporate media relations strategy:
  - Obtains approvals for release of information to the media
  - Handles inquiries and interview requests
  - Conducts briefings/interviews
  - Provides media management at affected location
  - Monitors media communications

- Develops and delivers internal communications.

- Coordinates internal/external communications with the Joint Information Centre (JIC).

- Coordinates communications with Enterprise Media Relations and ensures that all media emergency activities comply with the Enterprise Media Relations process.

- Coordinates communications to government, media, and major customers.

- Assists company spokespersons who are on site at the event or the Union Gas offices.

- Ensures consistency in messages across Union Gas.

- Mobilizes a communications emergency team—appropriate for the situation.

- Coordinates release of *Emergency videotape “Natural Gas Emergency Shut Off and Restoration”* to the appropriate media in consultation with the EOC Director.

- Maintains written record of all activities for this position.

- Participates in post-incident review as required.

- Participates in periodic emergency response plan drills.
3.3.8 **Documentation Coordinator**

**Location** - As per 3.3

**Assigned** - Head Office Emergency Manager

**1st Alternate** - Head Office Emergency Manager

**2nd Alternate** - Head Office Emergency Manager

**Role** - Provides administrative support for the operation of the EOC.

**Responsibilities**

- Chairs conference calls.
- Ensures adequate administration support and e-mail support.
- Manages event documentation (event log).
- Maintains status boards.
- Assists in EOC Activation, setup, and initial notification of EOC staff.
- Documents, on the Status Boards, in chronological order, events as they occur during the emergency.
- Maintains written records of all EOC activities.
- Documents and distributes Preliminary Incident Report information.
- Keeps minutes of EOC meetings and briefings.
- Ensures EOC office supplies are replenished as they are consumed.
- Arranges for the gathering of information for use by EOC staff and for future use (by video, camera, etc.).
- Collects all records and logs of event for the purpose of post-incident review and debrief.
- Posts updates/status summaries of major developments in EOC as well as update the Incident Management Tool.
- Assists with arranging for financing if extraordinary funds are required and complete purchasing transactions as necessary.
- Enlists the assistance of additional administrative staff as required.
- Collects all documentation after conclusion of emergency operations.
- Records EOC roles as assigned and posts on Coordinator wall chart.
- Participates in post-incident review as required.
- Participates in periodic emergency response plan drills.
3.3.9 Gas Control Coordinator

Location - As per 3.3

Assigned - Director, Gas Control, Capacity Planning & GMS

1st Alternate - Supervisor, Gas Control

2nd Alternate - Sr Advisor, Gas Control

Role - Monitors and provides current and forecasted system operating conditions and capabilities to the EOC including scheduled flows and options for supply.

Responsibilities

- Monitors total storage and transmission systems operations and identify potential adverse impact or risk to the operation in the event of a supply or system failure.
- Monitors and interprets SCADA to help determine the precise location and nature of the impairment.
- Confirms the nature of a third party supply issue with the EOC and/or DEOC as applicable.
- Communicates in a timely fashion system demand and capability to the executive, field operations, affected sales groups and affected interconnecting pipelines and Union’s shippers.
- Implements action plans to contain and mitigate the effects of the system/supply failure e.g. re-route gas, bring on additional compression or storage volumes, request additional supplies from others, curtail interruptible service, etc.
- Works with field operators in determining which valves to close/open to contain the incident/failure.
- Reconfigures the system as necessary to maximize throughput capacity working with Planning Team (Capacity, System and Distribution Planning), as required.
- Advises counterparts at interconnecting pipelines of the emergency and requests short term assistance (e.g. shut-in Parkway) and keeps those parties informed on the status of impairment.
- Determines supply shortfall (the difference between available supply and firm system demand)
- Allocates supply shortfall between in-franchise and ex-franchise customers as set out by the contract.
- Notifies Districts/Areas of the affected transmission and/or distribution system when an interruption or resumption of gas service is required.
- Implements the decision to curtail deliveries to the customers through interruption and/or force majeure notices.
- Obtains confirmation of interruption and curtailment status.
- Coordinates activities of the Gas Control & Capacity Planning department as well as the Gas Control Emergency Team.
• Maintains written record of all activities.
• Participates in post-incident review as required.
• Participates in periodic emergency response plan drills.

3.3.10 Planning and Dispatch Coordinator

Location - Participation by conference call

Assigned - Manager, Workload Planning

1st Alternate - Supervisor, Emergency Services

2nd Alternate - Supervisor, Southwest Planning and Dispatch

Role - Central Dispatch mobilization and customer communication (as required).

Responsibilities

• Participates in EOC teleconferences.
• Initiates emergency dispatch staffing plans including shift requirements and call-outs.
• Provides regular updates to Dispatching and Call Centre staff with key messages e.g., status of repairs and service restoration timelines.
• In conjunction with the DEOCs, coordinates movement/staging of field personnel to and from incident.
• With DEOC’s approval, contacts all additional internal resources.
• Develops a plan for the re-commitment of committed work.
• Coordinates Central Dispatch activities:
  • Maintains a written record of all first responder status using the Priority 1 log and Dispatch Emergency Responder Contact List (e.g., available for regular work).
  • Script for customer contact and Advantex (internal resources).
  • Runs ESAL listings and exports file (as required).
• Coordinates field resource allocations with EOC Logistics Coordinator and DEOC Logistics Section Chief.
• Participates in periodic emergency response team drills.
• Participates in post-incident review as required.
3.3.11 Contact Centre Coordinator

**Location** - Participation by conference call

**Assigned** - On-Duty Dial Customer Contact Support

**1st Alternate** - Team Lead, Contact Centre Planning & Support

**2nd Alternate** - Manager, Contact Centre

**3rd Alternate** - Supervisor, Contact Centre Operations,

**Role** - Contact Centre & Dialer mobilization, IVR & Call Pilot update, manager and customer communications:
- Notified by Planning and Dispatch Coordinator, District Duty Manager or EOC

**Responsibilities**
- Participates in EOC teleconferences.
- Notifies Director of Customer Care when Customer Contact Support initiated and with EOC updates.
- Notifies Manager, Contact Centre Planning & Support when emergency staffing plans are required to initiate staff call-outs and shift requirements.
- Initiates Contact Centre Dialer support, Technology & Information Services (TIS) as required:
  - Initiate Predictive Dialer campaign at the request of EOC Director, using relevant GECA or ESAL information.
  - Initiate appropriate re-routing of emergency calls.
  - Initiate appropriate changes to Call Pilot greetings and information update messages on the Brantford and London phone systems, and to IVR recordings if required.
- Provides incident communication to the Customer Care Managers, Contact Centre and customers through:
  - Dialer campaigns.
  - Regular updates to Contact Centre staff with key messages provided by Communications Coordinator, with an emphasis on status of repairs and service restoration timelines together with the processes to be used for order issue or insurance claims.
  - Ensures appropriate announcements on Brantford and London PBX are updated.
  - Ensures update communications are sent to Director and Customer Care Managers.
- Ensures appropriate record keeping associated with the incident including call volumes, wages and other expenses, and copies of communications material (mailbox – ContactCenterEmergencySupport@uniongas.com).
- Initiates staff demobilization and return to normal technology configuration.
- Participates in Post-Incident review as required.
3.3.12 Additional Resources

**Location** - As per 3.3

**Assigned** - As required

**Role** - Additional resources from Union Gas Head Office that should be called to provide subject matter expertise during a crisis.

May include the following personnel:

- Sales & Marketing
- Legal
- Engineering Services
- EHS Services
- Human Resources/Labour Relations
- Corporate Real Estate Services
- Technology & Information Services (TIS)
- Insurance Services
- Security
- Lands
3.3.13 Activation of the Incident Response Team

**Location** - To be dispatched to the DEOC or Incident Command Post, as required.

**Assigned** - As assigned

**Role** - Provide direct support to the DEOC Coordinator or Incident Commander, at the location of the incident. The Union Gas Incident Response Team is activated and dispatched by the EOC Director to the location where required.

**Responsibilities**

- Supports local management or the Incident Commander in response and/or recovery activities.
- Represents Union Gas interests in wide scale emergencies in Ontario or where needed.

May include the following personnel:

- Technical Support
- Municipal Relations
- Media Relations
- Logistical Support
- Financial Support
- Other SMEs as needed

**Incident Response Team Leader**

**Responsibilities**

- Ensures any additional team members have accepted their roles and agreed to the terms and conditions of their deployment.
- Ensures team members have adequate PPE with them or arrange for it to be picked up at the emergency location.
- If required, ensures all team members' vaccinations are up to date.
- Ensures team members have adequate finances for initial activation and develops plans for supplemental needs for the duration of the deployment.
- Notifies the on-site contact regarding the logistics of arrival.
3.4 District Emergency Operations Centre (DEOC)

The Primary and Alternate DEOC locations (including maps and fax/phone number information) are identified in Section 6.10, “EOC and DEOC Phone Numbers”.

Activation:
- The DEOC will be mobilized whenever additional assistance is required to support District field emergency response operations.
- See Section 4.4, “Team Activation” for activation requirements.

Function:
- Maintain local control over all emergency operations within the District
- Manage or provide direct support to ICP or field resources
- Set short-term goals for each operational period
- Ensure strategies and tactics for make safe, repair, recovery and stand down phases are developed, understood and followed. Update the plans as needed.
- Establish and maintain communications with the Union Gas EOC
- Obtain resources as needed to aid in Emergency Operations
- Manage public and media relations activities within the District
- Anticipate and plan for long term emergency operations within the District

Equipment:
- Union Gas Emergency Preparedness and Response Plan
- All relevant Municipal Emergency Operations Plans if available
- Emergency Response Plans for other local utilities if available
- Current Contract Customer Database contact lists
- Loadshed Plans
- DEOC room layout
- Whiteboard for status documentation
- Flip charts on easel
- Network drops
- Projector
- Access to Printer
- Access to fax machines
- Access to a photocopier
- Battery radio (AM/FM)
- Battery clock
- Television (cable access if possible)
- Telephones for inbound/outbound calls
- Telephone directories
- Municipal directories
- Cell phones
- Batteries and chargers
Equipment (continued)

- GIS CDs
- Wall space for info displays/status boards, etc.
- Basic stationery supplies (log sheets, pens, markers, highlighters, etc.)
- ESAL CD
- Conference call and e-mail protocol
- Access to maps and drawings
  - Emergency maps
  - Local street maps
  - Schematics/station isometric drawings
- Emergency power for lights and electrical outlets
- Sign for “DEOC”
- Access to emergency forms:
  1071 - Report of Plant Damage
  2761 - Preliminary Incident Report
  8186 - Suspicious Telephone Call Report
  8216b - Emergency Event Log (8 x 11 size)
  8205 - Incident Logistics Log
  8311 - Vehicle Incident Report Form
  8312 - Injury & Illness Report Form
  8313 - Environmental Incident Report Form
  8418 - Emergency Warehouse Order Form

Set Up:

- First person to arrive will establish communication with Field Responders
- Contact the Head Office Emergency Manager to confirm activation of DEOC
- Open an emergency event log
- Set up workstations
- Fill in Event status board
- Brief arriving DEOC members and record assigned roles

Staffing
3.4.1 DEOC Coordinator

**Location** - As per 3.4

**Assigned** – Regional Director/District Manager or as assigned

1st Alternate - C&G Supervisor, Regional Support Supervisor/STO Duty Manager

2nd Alternate - Utility Services Field Supervisor/ Duty Manager

**Role** - Responsible for the overall operation of the DEOC and maintains direct communication with the EOC.

**Responsibilities**

- Coordinates communications between DEOC and EOC, and between DEOC and ICP.
- Directs the emergency operations, assigns duties to the appropriate personnel, and activates the DEOC if necessary.
- Sets the Districts short-term goals for each operational period.
- Understands and approves, where appropriate the District strategies and tactics leading to full recovery
- Accountable for ensuring that the TSSA, Crawford & Company, EHS, the Municipality, etc. and the appropriate authorities (e.g., police, fire department) are notified when necessary.
- Forwards all relevant details to the Head Office Emergency Manager or EOC, and provides regular updates as required.
- Ensures that media requests are dealt with by appropriate media spokespersons.
- Designates the local media spokesperson to provide media briefings on site.
- Liaises with Planning and Dispatch directly or arrange for the participation of the Planning and Dispatch Manager to lead the Planning and Dispatch response activities (arranging resources, acquiring locates, customer contact, etc.).
- Liaises with Gas Control.
- Requests assistance from local resources.
- Identifies additional resources to make safe/repair. If assistance is needed from personnel outside of the District, contact the Head Office Emergency Manager. Use the Dispatch Emergency Responder Contact List.
- Maintains written record of all activities for this position.
- Conducts a transfer of command briefing for the incoming DEOC Coordinator.
- Participates in post-incident review as required.
- Participates in periodic emergency response plan drills.
3.4.2 Operations Section Chief

Location - As per 3.4

Assigned - Supervisor

1st Alternate - Supervisor

2nd Alternate - Supervisor

Role - Reports to the DEOC Coordinator and manages the make safe and recovery plans to resolve the incident.

Responsibilities

- Communicates with the ICP regarding Company Policies and External Agency directives.
- Coordinates Activities of Municipal Emergency Response Organizations and other External Agencies.
- Coordinates with the Incident Response Team to provide technical expertise, consultation, design, etc. for the expedient return to normal operations.
- Reviews District prepared scope and cost estimate for repairs.
- Coordinates requests for assistance from outside resources.
- Provides advice and support as required to the DEOC Coordinator.
- Requests release of Emergency videotape “Natural Gas Emergency Shut Off and Restoration” to the appropriate media in consultation with the EOC Communications Coordinator and the Regional Director/District Manager.
- Assists the DEOC in coordinating ongoing activities to restore service.
- Assists the ICP in developing action plan for make safe and repair.
- Coordinates Post Incident investigation of the incident with District Management.
- Participates in post-incident review as required.
- Participates in periodic emergency response plan drills.
3.4.3 Logistics Section Chief

**Location** - As per 3.4

**Assigned** - Supervisor

**1st Alternate** - Supervisor

**2nd Alternate** - Duty Manager, or as assigned

**Role** - Coordinates procurement of vehicles, resources, and supplies, and coordinates evacuation of public to emergency facilities as required.

**Responsibilities**

- Provides vehicles/emergency equipment as required.
- Provides supplies, transportation and facilities support.
- Liaises with Regional Director/District Managers and Corporate Real Estate Services to maintain Administrative Facilities support.
- Makes provision for staging of equipment near emergency site.
- Liaises with EOC Logistics Coordinator to ensure timely procurement of resources required for Emergency Response and Site Remediation.
- Maintains a current record of allocated resources.
- Keeps the DEOC Coordinator and DEOC Operations Section Chief informed of current activities and the state of Union Gas resources.
- Coordinates evacuation procedures with local authorities to establish emergency shelters if required.
- Brings in additional resources as necessary (e.g., Sales and Marketing, TIS, Ops Services, etc.).
- Participates in post incident debriefings.
- Participates in follow up activities as required.
- Maintains written records of all activities related to the position.
- Participates in periodic emergency response plan drills.
3.4.4 Administration Section Chief

Location - As per 3.4

Assigned – Regional Support Supervisor/ Team Lead STO Administration

1st Alternate – Advisor District Support

2nd Alternate - Duty Manager or Clerical Support

Role - Coordinates the administration, documentation, and all financial tracking for the DEOC.

Responsibilities

- Documents, in chronological order, events as they occur during the emergency.
- Update the Incident Management Tool, including the uploading of the Incident Action Plan for each operational period.
- Keeps DEOC meeting minutes and briefings using the Emergency Event Log.
- Supplies and replenishes all DEOC equipment. See Section 3.4 for a complete list of this equipment.
- Provides overall accounting/financial needs with respect to billing, invoice tracking, and post-incident payment.
- Posts updates/status summaries of major developments in DEOC.
- Enlists the assistance of administrative staff as required.
- Records role assignments.
- Collects all records from DEOC and ICP Staff for the purpose of the post-incident review.
- Participates in post-incident review as required.
- Participates in periodic emergency response plan drills.
3.5 Incident Command Post (ICP)

The ICP will be located at or near the emergency site. ICP location and room layout considerations are as follows:

- Able to provide support for the recommended equipment including sufficient parking to support the incident, electrical outlets, bathroom facilities, data phone lines, cell phone coverage, etc.
- Additional space to accommodate a staging area, logistics log station, separate quiet area for conference calls, data centre, computers, and a display area for maps.

**Activation:**
- A fully staffed Incident Command Post will be at the discretion of DEOC Coordinator

**Function:**
- Follow the directions of the Union Gas Incident Commander in responding to the emergency
- Provide resources to assist in emergency operations
- Work as a team in dealing with aspects of emergency that are the responsibility of Union Gas
- Be scalable in nature, depending upon the scope of the incident
- Update DEOC when activated regarding situational status as required

**Equipment:**

**Incident Commander Basic Equipment**
- Hard hat
- Safety boots
- Flame Resistant Garments
- Safety vest
- “Incident Commander” vest
- Safety glasses
- Hearing protection
- Camera (Smart phone camera acceptable)
- Flashlight and batteries
- First-aid kit
- Measuring tape
- Preliminary Incident Report sheets
- Evidence Tags (Form 2106)
- Emergency Response Plan
Equipment - continued

Incident Commander Recommended Equipment
- Sunblock
- Bug Spray
- Rain Suit
- Gloves

Incident Command Post Basic Equipment
- Printer configured to Duty Manager laptops
- Paper, pens, pencil, marker, highlighters
- Clipboards (legal size)
- Identification badges for ICP staff
- Glossary of Badge of colours
- Magnetic sign with words “Union Gas Incident Command Post”
- Field Responder tools:
  - Tapers
  - Matches
  - Gloves
  - Telescoping Pilots
  - 24” universal thermocouple
  - Flashlight, batteries
  - Sunscreen
- All appropriate Corporate Forms:
  - Infraction forms
  - Evidence tags (Form 2106)
  - CGI cards
  - Meter Location Code cards
  - Incident Logistics Log (sign in sheets - Form 8205)

Incident Command Post Recommended Equipment
- ESAL CD
- Digital camera
- Access to Fax/Photocopy machine
- Extra cell phones
- Command post identification
Section 3 - Organization

Set-Up:
- First person to arrive will establish communication with Field Responders
- Establish communications with DEOC when activated
- Record and maintain key actions and decisions concerning the incident
- Brief arriving ICP members
- Assign roles to Union Gas personnel

Staffing: Incident Command Post (ICP)
Emergency Preparedness and Response Program

Section 3 - Organization

Approver: Supervisor Emerg Resp Plng Syst Security

Issue Date: 2019-03

*internal and external resources required to assist in emergency response operations*
3.5.1 Union Gas Incident Commander

**Location** - To be determined at time of incident

**Assigned** – Utility Services Field Supervisor, Advisor District Support, or Duty Manager

**Alternate** – Utility Services Field Supervisor, Advisor District Support, or Duty Manager

**Role** - The Incident Commander is responsible for all response activities undertaken by Union Gas personnel and contractors at the emergency site.

**Responsibilities**

- Ensures safety of all site personnel.
- Identifies them self as Incident Commander, utilizing the Incident Commander Vest.
- Manages, directs, and oversees all Union Gas operations at the emergency site.
- Requests and assigns additional ICP roles as required.
- Assumes the responsibilities for any vacant roles within the ICP staff.
- Advises DEOC Coordinator of emergency conditions.
- Assesses the incident and provide reports to the DEOC.
- Approves and authorizes the EPRP implementation.
- Conducts all site briefings.
- Initiates the incident command system.
- Briefs the incident command staff and section leads.
- Coordinates Union Gas activities with those of other response agencies present at an emergency site.
- Advises DEOC of resource requirements for field operations.
- Conducts planning meetings:
  - Determines information needs
  - Informs all command personnel of information needs
  - Coordinates all the staff activity
  - Manages the incident operations
  - Approves requests and release of additional resources
  - Reviews any site information releases to the media
  - Approves the plan for the demobilization
• Ensures written records of all field emergency operations are maintained.
• Conducts a transfer of command briefing for the incoming Incident Commander.
• Participates in post-incident review as required.
• Participates in periodic emergency response plan drills.
• Regarding critical injuries and fatalities:
  • Clears area of all nonessential personnel and ensure the area is cordoned off
  • Implements area shutdown or evacuation as situation warrants
  • Notifies DEOC Coordinator to ensure that Union Gas EHS Services has been advised of incident
  • Instructs any witnesses to record in writing what they saw
  • Collects statements of fact from those involved - do not speculate or offer opinions on the incident or its causes
  • Considers requirements for scene security/preservation of evidence

3.5.2 Operations Leads

Location - Incident Command Post

Assigned – Utility Services Field Supervisor, Advisor District Support, or Duty Manager

Role - The Incident Commander (IC) determines whether there is a need for a separate Operations Section at an incident or event. Until Operations is established as a separate action, the Incident Commander has direct control of tactical resources and oversees the functions of the Union Gas 1st Responders and Contractors. For guidance, use the ratio of 8-12 Utility Services Representatives or Contractors to one Operations Lead.

Responsibilities

• Directs and coordinates all tactical operations ensuring the safety of all operations section personnel.
• Sets up the organizational structure of the section.
• Determines the resources required by the section.
• Assists the IC in developing objectives and strategies for the incident.
• Implements the operational portion of the incident action plan.
• Maintains written record of all activities for this position.
• Requests (or release) resources through the IC.
• Keeps the IC informed of the situation and resource status within operations.
• For detailed responsibilities in a gas outage, refer to Section 4.6.7.
3.5.3 Planning Lead

**Location** - Incident Command Post

**Assigned** – Utility Services Field Supervisor, Advisor District Support, or Duty Manager

**Role** - The Incident Commander determines whether there is a need for a separate Planning Section at an incident or event. Until Planning is established as a separate action, the Incident Commander has direct control of planning functions.

**Responsibilities**

- Collects, evaluates and displays information about the incident.
- In consultation with the Incident Commander and the DEOC, develops incident action plans for each operational period, conduct long range planning, and develop plans for demobilization at the end of the incident.
- Maintains resource status information on all equipment and personnel assigned to the incident.
- Maintains incident documentation.
- For guidelines to respond to a gas outage, refer to Section 4.6.7.
- For additional responsibilities regarding information collection refer to Section 4.6.7.6.

3.5.4 Logistics Lead

**Location** - Incident Command Post

**Assigned** – Utility Services Field Supervisor, Advisor District Support, or Duty Manager

**Role** - The Incident Commander determines whether there is a need for a separate Logistics Section at an incident or event. Until Logistics is established as a separate action, the Incident Commander has direct control of these functions.

**Responsibilities**

- Using the Incident Logistics Log:
  - Distributes and records the assignments of all Identification Badges to entire Incident Command Post staff and all Field Responders.
  - Distributes and records the assignments of all additional documentation/equipment to all Operations Leads/Field Responders and provide instructions.
  - Ensures resource status information on all equipment and personnel assigned to the incident are documented.
  - Tracks and records the start/finish times for all Incident Command Post staff and Field Responders.
• Responsible for all services and support needs of an incident, including:
  • Maintaining essential personnel
  • Facilities
  • Equipment
  • Supplies

• Responsible for acquiring and maintaining the Emergency Services Address Listing (ESAL) Outage Report for significant outages.
  • Sorts the ESAL outage report at the request of the Incident Commander to efficiently dispatch the turn offs/ons. (Note: Moderate skill with Excel spreadsheets is required).
  • Identifies Priority customers (noted as a 1 in the Priority column) on the ESAL list and notify the Incident Commander and the DEOC Coordinator.
  • Tracks the completed turn offs and turn-ons on the Master ESAL Outage Report spreadsheet.
  • Ensures the final lists of CGIs are provided to Shift/Day Dispatcher so that DSON orders can be created.

• The Incident Commander (IC) determines the need for a Logistics Lead based on:
  • Size of the incident
  • Complexity of support required
  • Likely duration of the incident

• For guidelines to respond to a gas outage refer to Section 4.6.7.

3.5.5 Union Gas Field Responders

Location - Incident Command Post

Assigned - Field Personnel (e.g., USR, STO Maintenance, Fieldman, Welders, Technicians)

Role - Operational response to emergency situation

Responsibilities
• Makes safe
• Reports to Dispatch/Dawn Control the status of the following items:
  • Arrival time.
  • Is natural gas involved?
  • Is the gas off?
  • What is the extent of personal property damage?
  • Is there media coverage?
3.5.6 Contractor

Location - Incident Command Post

Assigned - Contractor (e.g., Channel Partners, Pipeline Contractors)

1st Alternate - N/A

2nd Alternate - N/A

Role - Provide operational assistance to emergency situation

Responsibilities

- Signs-in with the Logistics Lead upon arrival at the Incident Command Post.
- Reports to Union Gas Operations Lead for work requirements.
- Maintains clear, concise records; recording all discrepancies.
Section 4 - Incident Response

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## 4.1 Emergency Response Matrix

The following table represents the minimum Union Gas response requirements in the event of an emergency.

<table>
<thead>
<tr>
<th>Emergency Description</th>
<th>Union Gas Primary Responder</th>
<th>Union Gas Secondary Responder</th>
<th>Tech</th>
<th>Notify District Duty Manager</th>
<th>Emergency Type Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Damaged Customer Meter Set-up</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>EMBG</td>
</tr>
<tr>
<td>• Blowing gas</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>EMBG</td>
</tr>
<tr>
<td>• Not blowing</td>
<td>Y</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>EMPD</td>
</tr>
<tr>
<td>• Fire</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>EMPD</td>
</tr>
<tr>
<td>Damaged Regulation Station (distribution, production or transmission)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Blowing gas</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>EMBG</td>
</tr>
<tr>
<td>• Not blowing</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>N</td>
<td>EMPD</td>
</tr>
<tr>
<td>• Fire</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>EMPD</td>
</tr>
<tr>
<td>Hit Main or Service</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Blowing gas - Damages that include:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Reports of blowing gas</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Reports of pinched off plastic mains/services and services with Excess Flow Valves (EFVs)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Reports of pulled steel mains or services and services with Excess Flow Valves (EFVs)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Not blowing gas – Reports of damaged coating requiring wraps or damaged tracer wires</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>EMPD</td>
</tr>
<tr>
<td>• Fire</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>EMPD</td>
</tr>
<tr>
<td>Leak or Odour (Inside or Outside)</td>
<td>Y</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>EMOO/EMOI</td>
</tr>
<tr>
<td>Carbon Monoxide - Fire Dept. requests assistance</td>
<td>Y</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>EMCO</td>
</tr>
<tr>
<td>Explosion</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>EMFP</td>
</tr>
<tr>
<td>Fire at Customer Premises</td>
<td>Y</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>EMFP</td>
</tr>
<tr>
<td>Iced Over Regulator</td>
<td>Y</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>EMIC</td>
</tr>
<tr>
<td>High/Low Pressure</td>
<td>Y</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>EMPR</td>
</tr>
<tr>
<td>Natural Disasters Affecting Union Gas’ Natural Gas System</td>
<td>Y</td>
<td>N</td>
<td>N</td>
<td>Y</td>
<td>EMPD</td>
</tr>
<tr>
<td>Aerial Patrol</td>
<td>Y</td>
<td>N</td>
<td>N</td>
<td>Y</td>
<td>EMPD</td>
</tr>
</tbody>
</table>

- **EMBG**: Emergency Management Branch Gas
- **EMPD**: Emergency Management Branch Pipeline
- **EMOO/EMOI**: Emergency Management Branch Odour/Over Inspections
- **EMCO**: Emergency Management Branch Carbon Monoxide
- **EMFP**: Emergency Management Branch Fire
### Section 4 - Incident Response

#### Emergency Preparedness and Response Program

<table>
<thead>
<tr>
<th>Emergency Description</th>
<th>Union Gas Primary Responder</th>
<th>Union Gas Secondary Responder</th>
<th>Tech</th>
<th>Notify District Duty Manager</th>
<th>Emergency Type Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee Injury Requiring Health Care or Vehicle Accident</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>Y</td>
<td>n/a</td>
</tr>
<tr>
<td>Emergency Provider Assistance</td>
<td></td>
<td></td>
<td>Y</td>
<td>N</td>
<td>EMFP</td>
</tr>
<tr>
<td>Call involving Fire or Police or other 1st responding agencies or TSSA requiring immediate assistance and not covered by any other emergency description</td>
<td></td>
<td></td>
<td>N</td>
<td>Y</td>
<td>EMPD</td>
</tr>
<tr>
<td>Report of Protestors at a Company Station</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>EMFD</td>
</tr>
</tbody>
</table>

**Notes:**

<table>
<thead>
<tr>
<th>Emergency Response Matrix</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Primary Responder</strong></td>
</tr>
<tr>
<td><strong>NOTE:</strong> Contacting the USFS/District Duty Manager shall be done as soon as possible and prior to the Responder leaving the site</td>
</tr>
<tr>
<td><strong>Carbon Monoxide</strong> - upon investigation if any of the scenarios below are identified, the District Duty Manager must be notified:</td>
</tr>
<tr>
<td>- Equipment serviced in the last 6 months by service provider</td>
</tr>
<tr>
<td>- An abnormal safety condition exists which may be the result of a product defect or an installation error</td>
</tr>
<tr>
<td>- Equipment failure in a rental property, where the occupant is not responsible for the maintenance of the equipment</td>
</tr>
<tr>
<td>- CO related injury as a result of problems with the equipment</td>
</tr>
<tr>
<td><strong>Fire</strong> - upon investigation if any of the scenarios below are identified, the District Duty Manager must be notified:</td>
</tr>
<tr>
<td>- Natural gas or a gas appliance is suspected as the cause of the fire or explosion</td>
</tr>
<tr>
<td>- A gas appliance is directly involved in the fire</td>
</tr>
<tr>
<td>- Meter or service is damaged by the fire or explosion</td>
</tr>
<tr>
<td>- Can’t shut gas supply off at the meter</td>
</tr>
<tr>
<td>- USR needs a physical assist</td>
</tr>
<tr>
<td>- An injury or fatality occurs as a result of the fire or explosion</td>
</tr>
<tr>
<td>- Fire Department requests USR to conduct an investigation</td>
</tr>
<tr>
<td><strong>Media is on site</strong> - Notify the District Duty Manager</td>
</tr>
<tr>
<td><strong>Protestors at a company site</strong> – Notify the District Duty Manager</td>
</tr>
<tr>
<td>- Observe the activists/protestors from a distance and document your observations</td>
</tr>
<tr>
<td>- Do not approach or confront the group</td>
</tr>
<tr>
<td>- Call 911 or designate someone to call 911</td>
</tr>
<tr>
<td>- If threatened leave the area immediately</td>
</tr>
<tr>
<td>Notes:</td>
</tr>
<tr>
<td>----------------</td>
</tr>
<tr>
<td>Dispatcher:</td>
</tr>
<tr>
<td>Day &amp; After Hrs</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Dispatcher:</td>
</tr>
<tr>
<td>Day only</td>
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<tr>
<td></td>
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<tr>
<td></td>
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<tr>
<td></td>
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<tr>
<td></td>
</tr>
<tr>
<td>District Duty</td>
</tr>
<tr>
<td>Manager</td>
</tr>
<tr>
<td>(or alternate)</td>
</tr>
<tr>
<td></td>
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</tbody>
</table>
4.2 Union Gas Definition of Emergency Readiness Levels

Union Gas operates within one of four readiness levels at all times. These readiness levels are as follows.

4.2.1 Normal

The IST Crisis Leader and the crisis/emergency organization are seeking out and monitoring internal incident status and external threats. No situation has been identified as a potential crisis requiring an elevated level of response or preparedness. Pandemic influenza threats are being monitored and the pandemic plans are updated as required.

4.2.2 Alert

An incident has been identified which represents a potential crisis for Union Gas. The situation warrants a heightened level of readiness to respond to potential consequences. Actions may be taken to mitigate the threat, disseminate information and personnel and other resources may be placed on standby. Pandemic influenza threats are being monitored, plans updated and additional PPE preparation is being made.

4.2.3 Limited

A crisis has occurred that has the potential for negative consequences. The incident may require the support, oversight and involvement of select members of the EOC/DEOC. This partial Team activation will include selected Team members dependent upon the specific event. Pandemic influenza threats are being monitored with specific operational and medical responses being activated.

4.2.4 Full

A crisis has occurred that has negative consequences. The full support of the entire EOC/DEOC may be required to ensure a comprehensive response to protect the business unit and provide proper support and assistance to other affected business units and communities. Pandemic influenza threats are being monitored with full operational and medical responses being activated.
4.3 Emergency Readiness Levels

<table>
<thead>
<tr>
<th>NORMAL</th>
</tr>
</thead>
</table>

*Normal Readiness Level will require no immediate activation of any ICP/DEOC/EOC.*

The conditions to determine this level include but are not limited to:

- Controlled Emergency Shut Down (ESD) of compressor plant
  - Emergency Shut Down (ESD) of a compressor plant which cannot be reasonably reset or restarted with no system impacts
- Short term compressor outage with no system delivery impact
- Any communication system or control system failures (STO/GC) with little to no impact with maintaining system integrity
- A communication system failure of a Call Centre or Emergency Call Handling centre that is manageable with normal business practices and does not have a significant impact on field response times
- Incident typical of what employees on site have been trained to deal with and normal operating procedures
- A contained release of product other than natural gas that does not impact the environment and can be cleaned up using internal resources
- Any call received by Gas Control that may be deemed to be outside of normal operating procedures, i.e., Emergency Response Services
- Non critical injury (requires medical aid)
- High water levels and flood warnings are issued
- General new virus monitoring information issued by World Health Organization through the Ministry of Health. Unconfirmed threats with non-specific information. Union Gas experiencing normal levels of absenteeism

**Actions To Be Taken:**

- Dispatch personnel to location
- Notify Duty Manager if applicable
- Notify the Gas Control Team Lead where required (Gas Control only)
- Other notifications if required
- Documentation as required
- Update Pandemic Plan as required
**ALERT**

*Alert Readiness Level will require activation of the ICP.*

The conditions to determine this level include but are not limited to:

- External agencies arrive at incident site
- Community Emergency Response Services have been called by Union Gas i.e., fire department, ambulance, police
- A spill or major spill of product other than natural gas requiring regulatory notification (see section 7.2.1 and refer to EHS programs, processes and procedures)
- A hazard resulting from Union Gas incident that has potential impact on surrounding property or the community
- Critical injury to employees
- Critical injury to citizens as a result of Union Gas involvement
- A loss of service to 60 customers or more
- An evacuation of 10 or more houses, any large complex, school or public building
- CO exposure due to hydrocarbon fuel appliance where:
  - Work was performed on the equipment in the past 6 months by a Service Provider
  - Equipment failure in a rental property, where the occupant is not responsible for the maintenance of the equipment
  - An abnormal condition due to product defect or installation error
  - CO related injury as a result of problems with the gas fired equipment
- Widespread communication system or control system failure (STO/GC) providing insufficient data to maintain system integrity
- A communication system failure of a Call Centre or Emergency Call Handling for an extended period that significantly impacts field response times or activities
- Fire or Explosion (including those involving equipment/appliances) where natural gas is suspected as the cause or where the resulting fire caused leakage or damage to the meter set
- Gas quality alert isolated to a single District
- Emergency Shut Down (ESD) of a compressor plant which cannot be reasonably reset or restarted affecting system operations
- Short term mainline compressor outage with potential of system delivery impact
- Notification of a gas interruption to in-franchise interruptible contract customers
- Failure to meet contractual obligations (pressure, flow, gas quality) where there is a transfer of gas to/from Union
- Minor flooding in areas served by natural gas but service has not been interrupted and flood waters are expected to rise
- More than 20 odour calls are received in one area
- An iced over regulator, over pressuring house piping by more than 2 psig
- A virus or disease has none or very limited human to human transmission. Union Gas sites are located within the epidemic area and experiencing limited levels of absenteeism
### ALERT

**Actions To Be Taken:**

- Notify District Duty Manager
- The Duty Manager will:
  - Activate ICP (staffing levels will be incident dependent)
  - Notify External agencies as required
  - Notify Head Office Emergency Manager
- All actions listed under NORMAL
- Activate the Gas Control Emergency Team where required (Gas Control incidents only)
- Ensure Pandemic Plan is current if required and order additional Pandemic PPE if required

### LIMITED

*Limited Readiness Level will require activation of the DEOC and possibly the EOC.*

The conditions to determine this level include but are not limited to:

- Bomb threat involving company property
- Peaceful protest at a Union Gas facility (See ERPP Section 9 for additional guidance)
- Resources from another District or non-company resources required to respond to an incident once all local resources have been deployed
- Major fire or explosion due to acts of nature, vandalism, etc.
- Local/Regional media involvement as a result of an incident
- Company property damage > $10,000 < $50,000
- Damage or leakage to a major lateral
- Damage or leakage on a pipeline operating above 30%SMYS
- Pressure in a transmission or distribution system has exceeded its MOP by 10% or greater for any duration.
- High/Low odourant occurrence or gas quality alert affecting more than one District
- Report of a gas leak on any pipeline operating at 30% SMYS or greater, or any transmission* pipeline
- Significant flooding requiring natural gas service interruption in a localized area
- A virus or disease has evidence of increased or significant human to human transmission. Union Gas sites are located within the affected areas and experiencing significant levels of absenteeism

**Actions To Be Taken:**

- Activate DEOC
- Possibly activate EOC
- All actions listed under NORMAL and ALERT
- Follow specific instructions and warnings from the Ministry of Health and Health Canada
- In a pandemic situation, antiviral medication to be dispensed if deemed effective
## FULL

**Full Readiness Level will require activation of the EOC, and possibly the IST.**

The conditions to determine this level include but are not limited to:

- Any incident that will require a re-allocation of gas supply (i.e., ECMAP (Eastern Canadian Mutual Assistance Plan)/TSSAP (Trafalgar System Shortfall Allocation Procedure) or activation of Load Shed procedures
- Any confirmed and credible hostile action, suspect event or threat against Union Gas’ facilities or a community which Union Gas serves
- Multiple critical injuries or fatality
- Damage to Union Gas’ reputation resulting from an incident
- Wide spread media interest as a result of an incident
- Any incident causing potential financial impacts of $1 million or greater
- Unplanned long term compressor/transmission* pipe outage resulting in system delivery impacts
- Loss of storage or compression resulting in system delivery impacts
- Activation of any Union Gas Business Continuity Plan
- High level of damage to public or environment as a result of an incident involving company operations
- Severe wide-spread flooding requiring natural gas service interruption for a large number of customers
- A virus or disease has efficient and sustained human-to-human transmission. Union Gas sites are located within the affected areas and experiencing severe levels of absenteeism

### Actions To Be Taken:

- Notify the CMT (refer to Section 6.4 for Notification Criteria)
- Activate EOC
- All actions listed under NORMAL, ALERT and LIMITED
- Follow specific warnings from Ministry of Health and Health Canada
- In a pandemic situation, the Pandemic Plan is fully implemented

---

* Transmission pipe: This definition applies to Gas Control and the pipe they monitor, e.g., storage fields, interconnects.
4.4 Team Activation

4.4.1 Normal Operations

The Union Gas Incident Commander may initiate activation of ICP members and appropriate support personnel after consultation with the DEOC Coordinator. When activating the ICP organization, the Union Gas Incident Commander and DEOC Coordinator will designate a time and confirm the location for the team meeting. Members of the DEOC may be reassigned to the Core Team or to the Incident Command Post.

4.4.2 Alert Activation

DEOC members are notified of an incident and placed on standby, and asked to be available to respond should the situation escalate. The DEOC Coordinator may, at their discretion, decide to staff the DEOC if the situation warrants a heightened level of readiness.

4.4.3 Limited Activation

EOC members are notified of an incident and placed on standby, and asked to be available to respond should the situation escalate. The EOC Director may, at their discretion, decide to staff the EOC if the situation warrants a heightened level of readiness.

4.4.4 Full Activation

EOC Director will notify the Union Gas Crisis Leader of an incident. The Union Gas Crisis Leader will notify the Union Gas president. For further information regarding the notification protocol, refer to section 6.2 in this manual.

4.4.5 Team Deactivation

EOC, DEOC, and ICP will remain activated until the incident has been addressed and the business recovery actions become routine. The decision to de-escalate the incident is the accountability of the Incident Commander. Factors to be considered in making this decision include but are not limited to:

- Affected area has been isolated (gas not blowing).
- Repairs have been completed and recovery is underway.
- Resources provided by neighbouring districts are no longer required.
- Source of odour has been determined (not natural gas).
- Source of the odour has been determined (natural gas) and the area has been made safe (may include on-site monitoring).
- Supply of gas to the premise/building has been shut off, or affected gas appliance(s) have been shut off.
- The Security Threat Level status has been reduced to Low (Blue) and scheduled monitoring activities are in place.
4.5 Preliminary Incident Report

The Preliminary Incident Report # 2761 must be completed in its entirety. The Checklist below will assist Duty Managers and Head Office Emergency Managers in completing the Report.

**NOTE:** Head Office Emergency Managers must submit the Report or call into Distribution Operations Support Admin staff the day of the incident or before 8:30 a.m. on the next business day if the incident occurred after hours, including weekends.

**INCIDENT TYPE**

**Carbon Monoxide**
- Ensure compliance to current CO policy.
- Has the TSSA been contacted (if required)?
- Was anyone sent to hospital, admitted or released?
- What appliances were involved?
- Were infractions written as required?
- If gas was turned off, where (at appliance valve or meter)?

**Damaged Meter Set (or first stage cut/farm tap)**
- How was damage caused (e.g., vehicle or vandalism)?
- Did the damage cause a gas release?
- How was the damage isolated?
- Has the Spills Action Center been notified (if required)?

**Fire**
- Is natural gas involved?
- Are there any injuries to the public or employees?
- Is the Fire Marshall involved?
- Did the fire cause damage to the gas meter/riser or gas service?
- What is the extent of the damages?
- Was Company property taken as evidence? By Who?
- Has the TSSA been contacted (if required)?

**Explosion**
- Is natural gas involved?
- Are there any injuries to the public or employees?
- Is the Fire Marshall involved?
- What is the extent of the damages?
- Is there damage to Union Gas property or equipment?
- Was company property taken as evidence? By who?
- Is bar holing or soil purging required?
- Were gas odour levels taken?
- Is Hetek required on site?
- Has the TSSA been contacted (if required)?
Environmental Spill
- Is Union Gas involved?
- What type of substance?
- Was the spill contained?
- What amount was spilled?
- Did the spill occur on our property? Has it spread off of the property?
- Are there any injuries to public or employees?
- What type of substance? Has EHS been notified?
- Has the Spills Action Center been notified (If required)?

Flooding
- Are meter sets or stations affected and how?
- Are customer appliances affected?
- How many customers and type (e.g., residential, commercial, hospital, day care)?
- What is the approximate depth of flooding?
- When will the flood water peak?
- What is the approximate duration of flooding, if known?

Gas Leak
- Is the leak inside or outside – buried or above ground?
- Have there been any evacuations? How many?
- Are there any frost conditions?
- Is bar holing or soil purging required?
- Have manholes or other structures been checked for gas?
- Is a gas analysis required?
- Is the leak on a pipeline operating at >30 SMYS (contact Pipeline Engineering immediately for direction)?
- Has the TSSA been contacted (if required)?

Iced Regulator - Over Pressure
- What is the estimated pressure in the house line?
- Is there damage to the equipment? (furnace, water heater etc.)
- Have infractions been written?
- Has the regulator and or meter been taken as evidence? By who?
- Is the regulator and or meter still intact (still frozen)?
- How was the problem detected?
- Have photos been taken?
- Has the problem been corrected and how?
Iced Regulator – Under Pressure
- Has the regulator and or meter been taken as evidence? By who?
- Is the regulator and or meter still intact (still frozen)?
- How was the problem noticed?
- Have photos been taken?
- Has the problem been corrected and how?

Relief Valve Blowing or System Overpressure
- Has system MOP been exceeded by 10% or greater for any duration? Contact Pipeline Engineering immediately for direction.
- What equipment malfunctioned?
- What caused the equipment malfunction?
- What was the peak pressure? Has the pressure returned to normal?
- How long did the relief valve blow?
- How was the problem detected?

Line Break
- Have any priority or large customers been affected?
- Were locates provided? Are they accurate?
- Describe the pipe details. (e.g. Size, pressure, material)
- Who caused the damage (e.g. person or company)?
- Has the damaged area been isolated? How (e.g. valves or pinched off)?
- Has the Spills Action Center been notified?
- Is the damaged pipeline operating at >30 SMYS (contact Pipeline Engineering immediately for direction)?

Lightning Strike
- Describe the pipe details (e.g. size, pressure, material).
- Is there damage to our equipment (e.g. meter set/station/plant/facilities)?
- Have manholes or other structures been checked for gas?
- Has a leak survey been completed along the service and main?
- For plastic piping systems, has the damage affected the tracer wire or insulation?
- Has the Spills Action Center been notified (if required)?
- Has above ground piping been investigated for possible arc burns?

Odour Call
- Is the odour inside or outside?
- Is natural gas involved – if not, what is the cause of the odour?
- Are other agencies involved (e.g. Fire Department)?
- If the odour is a leak, is the leak upstream or downstream of the meter?
- If caused by a spill, damage or a leak – what is the wind direction?
- What is downwind that may be effected?
- Were gas samples taken?
GAS CONTROL INCIDENTS

Interruption
❑ What district(s) are affected?
❑ What is the cause of the interruption?
❑ Have any large or priority customers been affected?
❑ Do we know the duration?

System Pressure Problem
❑ What district(s) are affected?
❑ What is the cause of the pressure problem?
❑ Have any large or priority customers been affected?
❑ Do we know the duration?

HYDRATE ALERT

Trafalgar / Panhandle / TCPL / Laterals
❑ What is the cause?
❑ What is the moisture content?
❑ What district(s) or areas are affected?
❑ Is there a need to bypass filters?
❑ Do we know the duration?
4.6 Gas Outage

Whenever there is an incident and or gas outage due to impairment of Union’s system which threatens the ability of Union to supply its customers with gas, there are levels of customer curtailment, in level of escalating severity:

**Interruptible Load Interruption** - A planned or unplanned event that occurs before a Force Majeure is being considered, with notification to affected customer(s) to curtail usage of any interruptible contract volumes.

**Load Shed (Voluntary Curtailment of Firm Load)** - A planned event or unplanned event that occurs before Force Majeure declaration occurs, with cooperation by the affected contract customer to voluntarily reduce usage of their firm contract volumes.

**Force Majeure** - Instructing customers to curtail/turn-off their gas, due to an inability to deliver their firm contracted gas supply.

4.6.1 Gas Supply Failure (including Pipe and Station emergencies)

- If there is an outage over a wide area, then determine the bounds of the problem very carefully to ensure that all customers who are out of gas have been identified.
- Generate a customer listing.
- Use the load shed and emergency valves or other valving to isolate and shutdown the affected system.
- Obtain sufficient people to shut off meter stops of affected customers.
- Reactivate and purge the mains.
- Resume service to affected customers.

4.6.2 Minimizing Curtailment

When there is a major reduction in gas supply that will affect either Union Gas’ in-franchise or ex-franchise customers, or both, the Crisis Leader and the Incident Support Team (IST) must consider the following:

- Minimize damage to property
- Maintain service to the maximum number of customers

The tool used to determine where curtailment is required and which customers should curtail their gas is called load shed. Refer to the EPRP Section 12 for District Specific Load Shed information.

Before Force Majeure is enacted, Union Gas will attempt to obtain emergency supplies from other interconnecting pipelines, Canadian and or U.S. sources when possible.

4.6.3 Curtailment Policy

In a major gas supply emergency, Union Gas will proactively minimize impacts to all communities by providing priority system supply to critical community infrastructure.
4.6.4 Curtailment Allocation Policy

If Union’s Trafalgar system is impaired, then Union’s ex-franchise customers will be curtailed proportionally, according to the S&T contracts. Supply to Union’s in-franchise customers downstream of the impairment will also be curtailed proportionately in accordance with the S&T contracts.

4.6.5 Force Majeure Declaration

4.6.5.1 Force Majeure Declaration (Gas Supply Initiated)

In a major gas emergency and once the following are confirmed:

- All interruptible loads are off
- Any voluntary downturn in firm usage is exhausted
- No additional emergency supplies via interconnecting pipelines can be obtained

And therefore, curtailment is the only way to maintain all or a portion thereof Union Gas’ transmission and distribution facilities, the decision to shed load via Force Majeure is made by the Crisis Leader in the IST. Once the decision to declare Force Majeure is made, use the following list (in order of priority) as a guideline to shed load on the system.

- A request for all classes of customers to reduce space heating demand, and identify unused demand requirements
- Firm Contract/Industrial Loads – provided that there will not be significant damage to plant operations or equipment (beyond solely commercial considerations)
- Residential/Commercial/Industrial load shedding areas, with consideration given to minimize impacts to:
  - Major care and detention facilities (e.g., hospitals, nursing homes, prisons)
  - Major community gathering places (e.g., schools, recreational halls, churches)
  - Number of customers that will be impacted
  - Isolated communities or a single large community

4.6.5.2 Force Majeure Declaration (Gas Delivery Initiated)

In the event of a gas outage resulting from a pipeline or station incident affecting in-franchise contract customers, the decision to declare Force Majeure is made by the Crisis Leader in the IST.

Declarations of Force Majeure will require consideration of all applicable facts as well as the legal terms of applicable contracts. A portion of the applicable language appears below.
A Force Majeure cannot be declared if any one or more of the following circumstances prevail:

- The Force Majeure was caused by the negligence of the party claiming Force Majeure.
- The party claiming Force Majeure failed to make all reasonable efforts (not including litigation, if such remedy would require litigation) to remedy the Force Majeure.
- The Force Majeure was caused by lack of funds.
- The party claiming Force Majeure did not give Notice required, as soon as reasonably possible after the Force Majeure occurred.

4.6.6 Force Majeure Response

For roles and responsibilities in a Force Majeure, see Figure 4.1: Incident Based Interruptions and Force Majeure Process which outlines the notification procedure.
Figure 4.1: Incident Based Interruptions and Force Majeure Process
Figure 4.2: Interruption or Return to Service Process
4.6.7 Responding to a Gas Outage

During a major emergency in a large center, there may be hundreds of people involved to assist in the operation. Identification of all personnel becomes critical. The following system shall be predetermined and tags are to be kept in the ICP Kit. Each District should retain enough badges to service their area, based on the gas outage tables.

4.6.7.1 Identification Badges

<table>
<thead>
<tr>
<th>Badge Color</th>
<th>Assigned</th>
<th>I.D. No.</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Red</td>
<td>Incident commander</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>White</td>
<td>Incident command post staff</td>
<td>1 to 25</td>
<td>25</td>
</tr>
<tr>
<td>Blue</td>
<td>Gas Tech I</td>
<td>1 to 100</td>
<td>100</td>
</tr>
<tr>
<td>Green</td>
<td>Gas Tech II, Gas Tech III, IMT, GP</td>
<td>1 to 200</td>
<td>200</td>
</tr>
<tr>
<td>Orange</td>
<td>Partner (HVAC) Tech I</td>
<td>1 to 100</td>
<td>100</td>
</tr>
<tr>
<td>Purple</td>
<td>Partner (HVAC) Tech II</td>
<td>1 to 100</td>
<td>100</td>
</tr>
<tr>
<td>Yellow</td>
<td>Drivers/Turn offs only</td>
<td>1 to 50</td>
<td>50</td>
</tr>
<tr>
<td>Aqua</td>
<td>STO/Compressor sites only</td>
<td>1 to 50</td>
<td>50</td>
</tr>
</tbody>
</table>

4.6.7.2 Meter Turn-Offs/Turn-Ons

This section describes the total time that is required to shut down and to relight a customer’s gas service. It takes into consideration loss of heat, and the number of USRs required to handle large outages. Figure 4.3: Rate of Cooling Curve shows the rate of cooling in a typical house (i.e., a single storey dwelling with a basement) without gas service. Heat loss equals 55,000 BTUH over 900 square feet.

1. Use the Emergency Service Address Listing (ESAL) to generate a report listing the gas customers and their priority (this application is on the Source). In the PRI column, regular customers are “blank” and only the priority customers have a “1” displayed.

   (Intranet Location: http://dos/Esal/Home.aspx )

2. Determine the shutdown requirements, e.g., time required for repairs, shutdown, and available resources.

3. Determine the light-up requirements, e.g., time required, hours, and available resources.
4.6.7.3 Shut Down/Meter Turn Offs

When it is necessary to shut down, you must:

- Determine the amount of time required for repairs.
- Determine the amount of time required for shut down.
- Determine the number of people available to assist in shutting off meters.

Assumption – One (1) USR can turn off 15 meters per hour, if there is access to the meter.

NOTE: In areas where access to meters may be difficult, the number of meters that can be shut off per rep, in an hour will be lower.

Once you have determined the required time for repairs, you can determine the amount of time required for shut down, and the staffing levels you will require. The following table describes how to determine the requirements for meter turn offs, using the example of 1200 affected customers and 8 available USRs.

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Calculation</th>
<th>Example</th>
</tr>
</thead>
<tbody>
<tr>
<td>Person-hours for shutdown</td>
<td>Divide number of customers by 15 (since 15 meters can be turned off in an hour)</td>
<td>1200/15 = 80 hours/USR</td>
</tr>
<tr>
<td>Limited number of hours</td>
<td>Divide shutdown person-hours by time to make repairs (e.g. 3 hours to repair)</td>
<td>80/3 = 26.6 USRs</td>
</tr>
<tr>
<td>Limited number of resources</td>
<td>Divide shutdown person-hours by available USRs (e.g. 8 Reps available)</td>
<td>80/8 = 10 hours</td>
</tr>
</tbody>
</table>

NOTE: This is dependent on a maximum ratio of 1 Team Lead per 15 USRs.

Turn off Guidelines

- Follow the assigned order found on the ESAL Outage Reports. If a customer around the corner approaches, advise them that work is being done on a street-by-street basis.
- Priority 01 customers indicated on the ESAL Outage report receive priority.
- Before turning off large customers (such as restaurants, hotels, production facilities), advise them that the gas will be turned off.
- Put an asterisk beside these customers so that they take priority for turn-ons.
- When the turns offs are complete, return the ESAL Outage Report to your Operations Lead.
4.6.7.4 Light Up/Meter Turn On

Light up cannot begin until all meters have been shut off, since there may be standing pilots and or failed pilot safeties in customers’ homes. To control this risk, all meters must be shut off before any meters are turned back on.

**IMPORTANT:** Gas cannot be re-introduced into the distribution system until you are certain all meters have been shut off.

**Assumption** – One (1) USR can turn on and light up 5 meters per hour.

The following table describes how to determine the requirements for meter turn-ons, using the example of 1200 affected customers and 8 available USRs.

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Calculation</th>
<th>Example</th>
</tr>
</thead>
<tbody>
<tr>
<td>Person-hours for turn on and light up</td>
<td>Divide number of customers by 5 (e.g. Since 5 meters can be turned on and relight in an hour)</td>
<td>1200/5 = 240 hours</td>
</tr>
<tr>
<td>Staffing Levels (dependent on the rating of cooling curve)*</td>
<td>Divide turn-on person-hours by available time (e.g. 4 hours based on cooling rate)</td>
<td>240/4 = 60 USRs</td>
</tr>
<tr>
<td>Limited number of resources</td>
<td>Divide turn-on person-hours by available USRs (e.g. 8 Reps available)</td>
<td>240/8 = 30 hours</td>
</tr>
</tbody>
</table>

*The Rate of Cooling Curve is found in Figure 4.3.

4.6.7.5 Relight Responsibilities

<table>
<thead>
<tr>
<th>Title</th>
<th>Task</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gas Tech I</td>
<td>● Relight any size and class of customer</td>
</tr>
<tr>
<td></td>
<td>● Additional customers with specialized equipment</td>
</tr>
<tr>
<td>Gas Tech II; Gas Tech III; Gas Utility Tech II</td>
<td>● Relight customer’s gas under 400,000 BTUH</td>
</tr>
<tr>
<td>ROT (Record of Training)</td>
<td>● Dwelling unit appliance relights. See Section 8, Glossary</td>
</tr>
<tr>
<td></td>
<td>● Under 400,000 BTUH</td>
</tr>
</tbody>
</table>
Turn On Guidelines

- Light ups should not be completed to premises without electrical power. In situations where electricity and natural gas supply are both effected e.g., tornado, coordination of light ups will need to be arranged with the local hydro utility.

- If the meter is already turned on, the house and appliances must be checked (as the customer may have turned the meter on themselves).

- If the meter is not accessible, notify your Operations Lead.

- If the meter has been locked off, do not turn it on. Note the following on the ESAL Outage Report – Meter Locked Off.

- CGI cards should be left at inaccessible premises on the final light up sweep.

- Ensure Emergency Call Handling or Day Dispatch is aware that CGI cards are being left.

- Consider the following factors when determining the number of light up sweeps:
  - Size of the outage
  - Number of reps on site
  - Time of day
  - Weather conditions, etc.

- Note all CGIs (Can’t Get In) in the ESAL Outage Report. Please note any comments regarding the address e.g., talked to neighbours; or house for sale; or appear vacant, etc.

- When the turn-ons listed on the ESAL Outage Report are complete, return the report to your Operations Lead.

- Advise Emergency Call Handling or Day Dispatcher of CGI addresses so they can create DSON orders.

Additional Information

Before sending the field responders for turn-ons and turn-offs, communicate the following additional information to them:

- Establish a ratio of 1 Operations Lead to a maximum of 15 Field Responders. Under difficult conditions, a ratio of less Field Responders per Operations Lead may be established.
- Rest time is mandatory. Report back to the ICP before and after the rest period (for tracking purposes).
- All Field Responders must report back to the ICP before going home.
- Advise the field responders of available places for eating lunch/dinner, hotel, etc.
- Hand out copies of local street maps to all “out-of-District” personnel.
- Ensure all field responders have matches, tapers, pens, etc.

Figure 4.3: Rate of Cooling Curve

Conversion Chart

<table>
<thead>
<tr>
<th>Deg. F</th>
<th>Deg. C</th>
</tr>
</thead>
<tbody>
<tr>
<td>70</td>
<td>21</td>
</tr>
<tr>
<td>65</td>
<td>18</td>
</tr>
<tr>
<td>60</td>
<td>16</td>
</tr>
<tr>
<td>55</td>
<td>13</td>
</tr>
<tr>
<td>50</td>
<td>10</td>
</tr>
<tr>
<td>45</td>
<td>7</td>
</tr>
<tr>
<td>40</td>
<td>4</td>
</tr>
<tr>
<td>35</td>
<td>2</td>
</tr>
<tr>
<td>30</td>
<td>-1</td>
</tr>
</tbody>
</table>
### 4.6.7.6 Planning Lead Responsibilities

As a planning lead, one of your responsibilities is to collect information about the incident. When on site, remember that you cannot take too many pictures. Date and sign all documentation as described in the following table.

<table>
<thead>
<tr>
<th>Type</th>
<th>Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Customer Premise</strong></td>
<td><strong>Photos of the incident in progress (if possible):</strong></td>
</tr>
<tr>
<td></td>
<td>• Exterior – all sides, proximity to adjacent buildings</td>
</tr>
<tr>
<td></td>
<td>• Appliances, equipment (whether involved or not)</td>
</tr>
<tr>
<td></td>
<td>• Other possible sources of ignition – tanks, debris, etc.</td>
</tr>
<tr>
<td></td>
<td>• Detailed photos of damage</td>
</tr>
<tr>
<td><strong>Sketches:</strong></td>
<td>• Layout of premise</td>
</tr>
<tr>
<td></td>
<td>• Location of equipment and appliances</td>
</tr>
<tr>
<td></td>
<td>• Layout of internal piping</td>
</tr>
<tr>
<td></td>
<td>• Location of mains, services, and meter</td>
</tr>
<tr>
<td></td>
<td>• Bar hole survey points</td>
</tr>
<tr>
<td><strong>Hit Line – Mains, Services, Stations</strong></td>
<td><strong>Photos:</strong></td>
</tr>
<tr>
<td></td>
<td>• Close up shots of damage in place with reference scale (e.g., tape measure)</td>
</tr>
<tr>
<td></td>
<td>• Field locates in area of hit (if applicable)</td>
</tr>
<tr>
<td></td>
<td>• Proximity to buildings, traveled portions of Road Allowance</td>
</tr>
<tr>
<td></td>
<td>• Equipment causing damage (in place where possible)</td>
</tr>
<tr>
<td><strong>Sketches:</strong></td>
<td>• Location of mains, services, valves and meter (do not include position of valves)</td>
</tr>
<tr>
<td></td>
<td>• Bar hole survey points</td>
</tr>
<tr>
<td></td>
<td>• Proximity to buildings, traveled portion of Road Allowance</td>
</tr>
<tr>
<td></td>
<td>• Topographical features, as well as wind and weather conditions</td>
</tr>
<tr>
<td><strong>Employee Injury, Vehicle Accidents</strong></td>
<td><strong>Photos:</strong></td>
</tr>
<tr>
<td></td>
<td>• All contributing factors, road conditions, visual inhibitors, weather conditions, lighting, other work conditions, etc.</td>
</tr>
<tr>
<td></td>
<td>• Detailed photos of damage, both company and private property</td>
</tr>
<tr>
<td><strong>Sketches:</strong></td>
<td>• Accident scene sketches, position of vehicles, skid marks, obstacles</td>
</tr>
<tr>
<td></td>
<td>• Include time of day, weather conditions, contributing factors, details and estimates of damage, investigating officers and details of all parties involved</td>
</tr>
</tbody>
</table>
4.7 Fire and Explosions

The procedures outlined below are meant as a guideline in an emergency, since each emergency is different. All actions must comply with Union Gas operating procedures.

4.7.1 Building Explosion

- Notify the Fire and or Police Department if necessary.
- Shut off the gas supply to the building.
- Evacuate the building and the surrounding area.
- Investigate the surrounding buildings for gas leaks.
- Perform barhole testing or F.I. survey for detecting gas near the buildings.
- Notify the appropriate people (Call Centre).
- Test for odourant levels.
- Call Hetek Consultants for third-party leak investigation if necessary.

4.7.2 Major Pipeline Explosion

- Notify appropriate Company personnel.
- Determine the exact location of the emergency.
- Plan and execute the isolation process.
- Develop and execute plan to supply gas to the maximum number of customers possible.
- Activate the appropriate emergency response plan.

4.7.3 Building Fire

- Notify the Fire and or Police Department if necessary.
- Shut off the gas supply to the building.
- Evacuate the building and the surrounding area.
- Investigate the surrounding buildings for gas leaks.
- Perform barhole testing or F.I. survey for detecting gas near the buildings if necessary.
- If you must dig, notify the appropriate utilities for locates.
- Notify the appropriate people.
- Call Hetek for third party leak investigation if required.
4.7.4 **Major Pipeline Fire**
- Notify appropriate Company personnel.
- Determine the exact location of the fire.
- Develop and execute the isolation process.
- Develop and execute the plan to supply gas to the maximum number of customers possible.
- Activate the appropriate emergency response plan.

4.8 **Gas Quality**
- Contact appropriate Company personnel for Districts affected:
  - During business hours - Contact the Field Supervisor Technicians
  - After business hours - Contact the On Call District Duty Manager or the On Call Technician
- The On Call Gas Control Coordination group e-mails **ONT UGL GAS QUALITY ALERT** – subject line will contain Gas Quality Alert – **Affected Districts**
- Review notification procedures for interconnects and interconnecting operators as appropriate.

4.9 **Spill**
- Assess the severity of the spill utilizing the Emergency Readiness Level table and Section Spill Severity Table in Section 12.1 - EHS programs, processes and procedures.
- Report all product releases (Leak, Spill or Major Spill) to local EHS Coordinator or delegate
- Contact the MOE if required (Spill or Major Spill)
- Contact the appropriate spill responder, if the spill is an Alert Readiness Level or higher, contact Head Office Emergency Manager

Refer to *When to Notify the Ministry of Environment (MOE)* in Section 7.2.1, *When to Contact the Spills Action Centre*, for detailed information.

4.10 **Flooding**

Ensure a District relationship is established with local authorities and municipalities having jurisdiction regarding any flooding in your area. This allows for timely communication during a flooding situation as all accountabilities are understood. Refer to Section 4.6.7, "Responding to a Gas Outage" when responding to a Flooding emergency. Additional guidelines have been provided below.
4.10.1 General Safety

DO NOT:

- Drive into a flooded area where there is fast moving water or where admittance is restricted by the local municipal authority having jurisdiction.
- Walk into a flooded area where there is fast moving water or the water level is 15cm deep and rising. (If it appears the meter sets may become covered with flood water, the meters must be shut off. If USRs are unable to enter the flooded area to shut meters off, develop an isolation plan.)
- Enter a flooded area of a building.
- Enter a premise where it appears the structural integrity has been compromised.
- Approach appliances that have water pooled around them.
- Touch cables, cords, or equipment that may have been in contact with water.

4.10.1.1 Entering a Premise that has been Flooded:

- Do not enter a premise until electricity has been restored by the local utility and it has been determined it is safe to enter.
- If a strong sewage odour is present and the gas cannot be shut off from the outside, ensure all biohazard PPE is worn, including two pairs of Nitrile gloves underneath work gloves before entering the building.
- Notify the Dispatcher that you are entering a previously flooded premise.
- Touch as few surfaces as possible. When required, only kneel on a large plastic garbage bag.

4.10.1.2 Exiting a Premise that has been Flooded:

- Carefully remove biohazard PPE if utilized. Ensure PPE does not come in contact with bare skin / hands.
- Place all PPE in a biohazard bag and place in a safe storage location, label the contacts and notify local EHS to dispose.
- Wipe down all tools used in antibacterial wipes.
- Clean hands with antibacterial wipes before entering vehicle.

4.10.2 Working on the Pipeline System after a Flood

- Assess any damage to the system.
- Replace meters and regulators, if it is suspected that they have been submerged under water (utilize Plant Damage Report).
- If a meter is shut off and an “A” infraction is issued due to flooded appliances, do not lock off the meter. This allows the customer-called HVAC contractor to clear the “A” tag and turn the gas back on.
• If a meter is shut off and an “A” infraction is issued due to the meter and regulator being submerged in water, lock off the meter with a do not tamper/touch tag until a rebuild can be completed. This prevents the customer-called HVAC contractor from turning the gas back on before Union Gas has replaced the meter and regulator.

• If water has entered the pipeline system, isolate the affected area. PIG the system or use hydrovac if required. Inject slugs of alcohol if determined necessary to dry out the pipeline. Once water has been removed, purge and return system to service.

• Inspect stations and repair if required.

• Leak survey the affected pipe.

4.10.3 Customer Communication

• Contact an approved HVAC Contractor to inspect any appliance that has come in contact with water to determine if the controls need to be replaced. The Contractor will also be able to check the chimney liner to ensure it is clear and drain any water that may have entered the system.

• Remove standing water, mud, or any debris from rooms that our rep may need to enter from all areas, including basement.

• Remove any chemicals / cleaning agents that may have spilled.

• Ensure electricity to premises has been restored.

4.11 Building Evacuation

When a fire alarm sounds or an evacuation decision is made, the procedure will be to evacuate the affected building immediately and completely. Floor plans indicating exits and fire extinguishers are posted throughout the Buildings.

4.11.1 Evacuation

In the event of an evacuation, occupants must do the following:

• Notify the Head Office Emergency Manager or Head Office Security (applicable to Chatham Corporate office only)

• Move calmly and quietly to the nearest exit or stairway to exit. Follow the closest exit path out of the building and proceed to the assigned assembly area.

• Escort any visitors, customers, or contractors in the area out of the building.

• Do not delay evacuation to gather personal belongings or finish work in progress.

• Do not use elevators as a means of exit. They may become inoperative during such evacuations.

• Exit through a stairway by descending except from below ground level. Walk quickly - DO NOT RUN. Exercise caution on stairs and at entry points where additional evacuees may be entering.
• In the event special assistance is required, it is the responsibility of the employee, **BEFORE** an emergency arises, to notify the “Fire Captain”. The “Fire Captain” will then make the appropriate arrangements.
• Do not smoke during an evacuation.
• Close doors which are located convenient to the evacuation path, but do not take extra time to perform this task.
• Upon exiting the building, proceed directly to assembly areas. Employees shall not leave their assembly areas without approval of management.
• At assembly areas, report to person designated to perform employee head count.
• Report the names of any visitors, customers, or contractors escorted out the building for accountability.
• Do not re-enter a building until a local authority has given the order to return.

### 4.12 External Communication and Media Relations

At Union Gas, it is our policy to be proactive in our dealings with the news media and to respond to requests for information in a prompt, co-operative and factual manner. In this way, we help to foster good public awareness and understanding of our operations, achievements and policies as well as maintaining our reputation as a responsible corporate citizen in the communities we serve. The following table lists the designated Company spokesperson for different issues.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Chief Spokesperson</th>
</tr>
</thead>
</table>
| Corporate, Company-wide    | - Supervisor, External Communications and Media Relations, on behalf of the President, CEO, and senior Management.  
                             | - Management spokesperson from specific areas (e.g., Sales and Marketing, Finance, Regulatory, etc.) are designated in consultation with the appropriate Vice-President. |
| District Operations        | - Regional Director/District Manager or Director STO – may delegate responsibility to Utility ServiceField Supervisor, Construction & Growth Supervisor, or other media trained spokespersons, as required. |

#### 4.12.1 Training

Designated spokesperson must have received company approved media relations training. Exceptions will be approved by the Supervisor of External Communication and Media Relations. It is assumed that the designated spokesperson will speak only on issues in which they have expertise. Questions beyond the spokesperson’s areas of expertise should be referred to the Supervisor of External Communication and Media Relations for follow-up.
4.12.2 Supervisor, External Communication and Media Relations

The Supervisor of External Communication and Media Relations or delegate is available at all times for consultation, assistance, or additional information required by designated spokesperson for interviews with the media. However, in the case of a local issue, a media representative should never be referred to the Supervisor of External Communication and Media Relations for comment before the Supervisor is briefed on the particulars of the issue.

Employees making public presentations or giving evidence before regulatory bodies may respond at that time to news media queries related to that particular presentation or evidence.

4.12.3 Referring Media to Company Spokesperson

In areas of the Company’s operation where emergency policies are in place to refer media requests to a specific spokesperson in the event of an incident, the following response may be useful for anyone receiving the initial media call:

“I can confirm that an incident has taken place at _________. For more information, you can call __________ __________, who is our spokesperson, at (xxx) xxx-xxxx. They have the information on the incident at this time and can respond to your questions as well as provide you with updates when more information becomes available.”

Get the reporter’s name and media affiliation (radio station, newspaper, or TV station) and phone number so that you can call your spokesperson to let them know that a media call is on the way. Ensure the spokesperson is sufficiently briefed on the circumstances of the incident prior to the media referral being made.

Employees who have not received media training and are not a designated spokesperson should politely decline to respond to media inquiries while at the same time offering to arrange for a spokesperson with the necessary expertise to contact the media representative. The employee would then promptly contact their spokesperson to respond.

Any request from the news media for information is to be relayed to management immediately in order to be dealt with in a timely manner. Failure to do so will leave the company at risk of the publication or airing of inaccurate information resulting from the absence of the Company’s perspective.

4.12.4 Media Advisory

All official information to be released to the news media is prepared, approved, and disseminated through appropriate channels by the Union Gas Public Affairs department.

For further information on dealing with media requests, call the Supervisor of External Communication and Media Relations.
4.13 Emergency Warehouse

The purpose of Emergency Inventory is to have pipe and fittings set aside in District Warehouses in order to “make safe” in emergency situations. For more details on Emergency Warehouse procedures, refer to the Emergency Warehouse Process Manual.

Materials are maintained and stored in staffed and unstaffed warehouses. The staffed warehouses have warehouse personnel who select the materials required for an Emergency and ship out those materials to the Emergency site. Unstaffed warehouses do not have Warehouse personnel and the District Duty Manager (or delegate) is responsible for selecting and shipping the material(s) to the Emergency site. The Warehouses are as follows:

1. London Warehouse (staffed): emergency materials generally sized NPS 2 through NPS 12, for Southern Ontario
2. Dawn Warehouse (staffed): emergency materials sized NPS 16 and above for all Ontario
4. Sudbury Warehouse (staffed): emergency materials for North Eastern Ontario
5. Thunder Bay Warehouse (unstaffed): emergency materials for North Western Ontario

These locations can provide Emergency Inventory materials, given a three-hour lead. The following table describes the process for requesting and returning material from a warehouse.

**NOTE:** Approval from the Head Office Duty Manager must be received prior to any materials being released.
### Section 4 - Incident Response

<table>
<thead>
<tr>
<th>Step</th>
<th>Details</th>
</tr>
</thead>
</table>
| **Request for Emergency Inventory**  
(after business hours) | The District Duty Manager (or delegate) will contact Emergency Call Handling and provide the following information:  
- Emergency Warehouse location that will receive the request (see the Warehouse List)  
- Material Number  
- Size and description  
- Quantity  
- Location for delivery or pick up details  
- Contact’s name, phone number (cell or office), and relevant details  
The Emergency Call Handler will contact the Head Office Emergency Manager. |
| **Receipt of Request by the Emergency Warehouse** | Upon receipt of the request for Emergency materials, the material must be issued from the Emergency Warehouse and charged to one of the following:  
- London Emergency Warehouse: 210454  
- Dawn Emergency Warehouse: 312702  
- Kingston Emergency Warehouse: 214737  
- Sudbury Emergency Warehouse: 214737  
- Thunder Bay Emergency Warehouse: 214737 |
| **Delivery of Emergency Materials** | Once the material is picked, arrangements must be made to deliver the materials to the Local Warehouse or to the Emergency site.  
At the requesting Manager’s discretion, a vehicle may be sent to pick up the materials. If not, the Emergency Warehouse personnel will make the transportation arrangements. If unsure about transportation arrangements, contact Materials Management for help. |
| **Confirmation** | After the materials leave the Emergency Warehouse, the Warehouse person will phone the Manager requesting the material to confirm that the material is on the way. |
| **Returns** | Return materials not used in the emergency or materials that were used but are no longer needed to the local Warehouse as soon as possible. Arrangements will be made to transfer the material to the Emergency Warehouse.  
Indicate the job account number on the transfer so that refurbishing costs can be charged accordingly. |
4.13.1 Emergency Inventory Process

4.13.1.1 Process Definition

An emergency is defined as “an incident that threatens human life, health, property and or environment if not controlled or eliminated promptly.” The purpose of Emergency Inventory is to have pipe and fittings set aside in Regional Warehouses in order to “make safe” any emergency situations that may occur. Pipe lengths and transition pieces will be required to sufficiently replace one joint of any pipe in Union’s distribution system (all pipe to be pre-tested). Materials will be maintained and stored in four (4) Emergency Warehouses: London, Kingston, Sudbury and Thunder Bay. These locations will be able to provide Emergency Inventory materials where an estimated three (3) hour lead is acceptable.

The physical control of the Emergency Inventory will be the responsibility of:

- District Managers for the unstaffed Warehouses in Kingston and Thunder Bay
- Warehouse Team Leads for the staffed Warehouses in London and Sudbury

4.13.1.2 Team Members

Emergency Call Handling: Responsible for handling the Emergency call and contacting the Head Office Emergency Manager, District Duty Manager, and the appropriate Warehouse Personnel.

Head Office Emergency Manager: Responsible for authorizing the removal of the emergency materials from any of the Emergency Warehouses.

Warehouse Personnel: Responsible for getting the requested emergency materials from the Emergency Warehouse and making arrangements to have materials shipped to the Emergency. Responsible to ensure that any materials being returned to the Emergency Warehouse for inventory is in useable condition.

Logistics Manager: Accountable to ensure that Emergency Materials are stored, maintained and counted once per year. They are also accountable to verify the quality and integrity of all materials in the Emergency Warehouse annually. The Warehouse Process Coordinator along with District Engineers and Pipeline Engineering will assist as required.

Pipeline Engineering and District Engineer: Will support the Emergency Inventory Warehouse Process.

Procurement: Responsible for purchasing the Emergency materials as requested by Warehouse personnel.

Warehouse Analyst: Will support the Emergency Inventory Warehouse process.
Section 4 - Incident Response

Emergency Preparedness and Response Program

Section 4 - Incident Response

Approver: Supervisor Emerg Resp Plng Syst Security

Issue Date: 2019-03

<table>
<thead>
<tr>
<th>Inputs</th>
<th>Process Steps</th>
<th>Responsibility</th>
<th>Output</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Contact:</td>
<td>• In the event of an emergency for which Emergency materials are required, a call must be made to Emergency Call Handling (1-800-699-0633).&lt;br&gt;• The requestor (District Duty Manager or delegate) must provide the following information:&lt;br&gt;1. Emergency Warehouse Location&lt;br&gt;2. Material Number&lt;br&gt;3. Size and description&lt;br&gt;4. Quantity&lt;br&gt;5. Location for delivery or pick up details&lt;br&gt;6. Contact’s name, phone number (cell or office) and relevant details</td>
<td>Requesting Manager</td>
<td>Emergency Call Handler</td>
</tr>
</tbody>
</table>

The Emergency Call Handler will contact the Head Office (HO) Emergency Manager to notify them that a request for Emergency materials is expected. The Emergency Call Handler will also contact the appropriate Warehouse person (as per the call-out process) who is responsible for getting the Emergency materials out of the Warehouse.

**NOTE:** After hours, Emergency Call Handling calls-out Warehouse personnel. Upon arrival, Warehouse personnel reports to Emergency Dispatch. Warehouse Personnel receives instructions and executes instructions.

The HO Emergency Manager will ensure that the Call Handler has the phone, cell, and fax number that they can be reached at. Upon receipt of the request, the HO Emergency Manager must evaluate the request for materials and approve or deny as required.
<table>
<thead>
<tr>
<th>Inputs</th>
<th>Process Steps</th>
<th>Responsibility</th>
<th>Output</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Request for Emergency Inventory:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• An Emergency Warehouse Order Form #8418 must be filled out by the Requesting Supervisor or delegate either on-line or manually and must be approved by the Head Office Emergency Manager.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• If the form is completed on-line, the requesting Supervisor will indicate the Emergency Warehouse Location that is to receive the notification. The Name of the HO Emergency Manager that has approved the request must be included on the document or the request will not be filled.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• When a verbal authorization by the Head Office Emergency Manager is utilized, the completed Emergency Warehouse Order Form must still be forwarded to the Head Office Emergency Manager for approval and filing, and then forwarded to the appropriate Emergency Warehouse within two (2) business days.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• If the Emergency Warehouse Order Form was completed manually (paper copy), scan it and send as an e-mail attachment to the Head Office Emergency Manager for approval. A copy will also need to be sent to the appropriate Emergency Warehouse.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Section 4 - Incident Response

### Emergency Preparedness and Response Program

<table>
<thead>
<tr>
<th>Inputs</th>
<th>Process Steps</th>
<th>Responsibility</th>
<th>Output</th>
</tr>
</thead>
</table>
| **Receipt of Request by the Emergency Warehouse:** | Upon receipt of the approved request for Emergency materials, the material must be issued out (Movement # 261) from the Emergency Warehouse and charged to one of the following:  
   - London Emergency Warehouse……………….210454  
   - Dawn Emergency Warehouse………………...312702  
   - Kingston Emergency Warehouse…………….……214737  
   - Sudbury Emergency Warehouse………………..214737  
   - Thunder Bay Emergency Warehouse…………….214737 | Warehouse Personnel | |
|  | Where it indicates Material Slip #, the address of the Emergency will be filled in and on the subsequent screen, the Requestors name must be filled in as well in order to track the costs properly. | | |
|  | These IO numbers are temporary until a Project number or IO number is received for the emergency to charge the parts to. Once the Project/IO Number is received, all the charges will be reversed (Movement # 262) from the IO numbers above and issued to the Emergency Project/IO Number. | | |
|  | **NOTE:** In the event that the material being requested is quarantined, the Warehouse Person will contact the Head Office Emergency Manager. The Head Office Emergency Manager will contact an Engineer (from the Engineering Contact on Emergency List) for approval for use. | | |
| **Delivery of Emergency Materials:** | Once the material is picked, arrangements must be made to deliver the materials to the Local Warehouse or to the Emergency site. | Warehouse Personnel | |
|  | At the requesting Supervisor's discretion, a vehicle may be sent to pick up the materials. Otherwise, the Emergency Warehouse personnel will make transportation arrangements. | | |
| **Confirmation:** | After the materials leave the Emergency Warehouse, the Warehouse person will phone the Supervisor requesting the material confirming that the material is on the way. | Warehouse Personnel | |

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**Emergency Preparedness and Response Program**  
**Section 4 - Incident Response**  
Approver: Supervisor Emerg Resp Plng Syst Security  
Issue Date: 2019-03
### Inputs | Process Steps | Responsibility | Output
--- | --- | --- | ---
**Inputs**

<table>
<thead>
<tr>
<th>Replenishment of Emergency Materials:</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Two (2) business days after the issue of the materials from the Emergency Warehouse, the Warehouse person will contact the requesting Supervisor in order to determine if any of the materials will be returned back to the Emergency Warehouse.</td>
</tr>
</tbody>
</table>

| The Warehouse Person will email Pipeline Engineering and Procurement of what materials are being returned to the Emergency Warehouse and what materials are to be ordered. If the Warehouse Person does not receive any notice back from either party within one (1) business day, the materials will be ordered. |

<table>
<thead>
<tr>
<th>Returns:</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Materials not used in the emergency or materials that were used but are no longer needed, must be returned to the local Warehouse and then arrangements will be made to have the material transferred back to the Emergency Warehouse.</td>
</tr>
</tbody>
</table>

| All material returned to the Emergency Warehouse must be inspected by any one of the following people: District Engineer, Pipeline Engineering, (or someone from that Group) or by someone who has a working knowledge of whether a material is still in proper working order. |

| The Emergency Warehouse will be responsible for restoring used material to good working condition. Expenses incurred in refurbishing will be charged to the Emergency Project/IO Number. |

| Return of materials should be done as soon as possible after the Emergency is contained so that any materials that have been ordered for replacement in the Emergency Warehouse can be cancelled. |

| The account number of the job must be indicated on the return paperwork so that refurbishing costs can be charged accordingly. |

| Warehouse Personnel |
| Pipeline Engineering / Procurement |
| Warehouse Personnel |
| Engineering / TSM Group |

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4.13.1.3 Changes to the Current Process

- Addressed the issue of the quarantine of Emergency Warehouse materials.


Each Emergency Warehouse will have an Emergency Inventory Process Manual that contains the following:

1. The process for getting Emergency materials out of the warehouse as well as stock replenishment.
2. Mill Test Records (MTRs)
3. Pressure Tests
4. A listing of the materials in the Emergency Warehouse
5. Blank Emergency Warehouse Order Forms
6. Completed Emergency Warehouse Order Form 8418
7. Annual count sheet verified, signed, and dated by all count participants

**NOTE:** A master binder will reside in Pipeline Engineering, Chatham Corporate that will contain (the above list) from each Warehouse. When any materials with corresponding MTR or Pressure Tests are removed from inventory (used in an Emergency) the associated paperwork will be sent to the Mapping Department for filing.

4.13.1.5 Regional Warehouse Emergency Materials

Each Regional Warehouse will have a binder set up with blank Emergency Warehouse Order Forms.

The Pipeline Engineering Group will determine the materials required to be kept by each Regional Warehouse, for example:

- London Warehouse (P104/A001) will house emergency materials generally sized NPS 2 through NPS 12, for Southern Ontario.
- Dawn Warehouse (P107/Z001) will house emergency materials sized NPS 16 and above for all Ontario. As an alternative, Pipe may be listed in SAP as P107/B001 and identified in the pipe log maintained by Procurement (MM) as “security” pipe.
- Kingston Warehouse (P302/Z078) will house emergency materials for Eastern Ontario.
- Sudbury Warehouse (P301/Z032) will house emergency materials for North Eastern Ontario.
- Thunder Bay Warehouse (P300/Z002) will house emergency materials for North Western Ontario.
4.13.1.6 Notes

Each Warehouse location will paint red lines on the shelving units surrounding the Emergency materials. In addition, a sign is to be posted stating “Emergency Inventory”. The process for issuing Emergency materials should be posted on the wall or shelf unit close to the Emergency materials.

Each pipe transition piece will be tagged at each end indicating the respective matching wall thickness.

In order to issue materials from the Emergency Warehouse, authorization must be given by the Head Office Emergency Manager either verbally and or by approving the Emergency Warehouse Order Form.

All inventory held in the Emergency Warehouses will be counted once per year. District Staff familiar with the materials (e.g. Pipeline Engineering / SM & C Ops), will verify the quality, and a Warehouse person, will do the count every February/March. The Warehouse Analyst will also participate in the annual count.

During the quality check if it is found that the Emergency material needs to be replaced or refreshed, a request will be made to the Warehouse person to order the appropriate material.

Approved for use, material will be transferred from the Emergency Warehouse to the Main Warehouse. Material deemed to be Obsolete, will be disposed of immediately to ensure that it does not become part of our plant.

In the event that a Quarantine Notice is sent out, and it affects material in the Emergency Warehouse, the Warehouse Process Coordinator will advise the Engineer involved. The reason for this is to advise the Engineer that in the event of an Emergency, the Engineer will receive a call for approval to use or to provide a substitute material. Warehouse Personnel will attach one of the pink quarantine cards to the part and leave it on the Emergency Warehouse shelf. On the pink card, the name and phone number of the Quarantining Engineer will be added.
### 4.13.2 Emergency Material List

The following material quantities will be available in the Emergency Warehouses. You must fill out the Emergency Warehouse Order Form #8418 to order the material you need. An image of Form 8418 is shown after the Emergency Material List tables and is available online on the Source.

#### 4.13.2.1 Emergency Material List for London Warehouse

<table>
<thead>
<tr>
<th>Material Number</th>
<th>Description for London Warehouse</th>
<th>Material Number</th>
<th>Description for London Warehouse</th>
</tr>
</thead>
<tbody>
<tr>
<td>138855</td>
<td>BAG,STOPPING,12 IN</td>
<td>113777</td>
<td>FLANGE,BLIND,10 IN,PN100,RF,CS,GR 248</td>
</tr>
<tr>
<td>107625</td>
<td>BAG,STOPPING,6 IN,POLYESTER</td>
<td>113304</td>
<td>FLANGE,BLIND,12 IN,PN100,RF,CS,GR 248</td>
</tr>
<tr>
<td>107599</td>
<td>BAG,STOPPING,C, GAS,2 IN,POLYESTER</td>
<td>113727</td>
<td>FLANGE,BLIND,12 IN,PN100,RF,CS,GR 248</td>
</tr>
<tr>
<td>107606</td>
<td>BAG,STOPPING,C, GAS,4 IN,POLYESTER</td>
<td>113712</td>
<td>FLANGE,BLIND,2 IN,PN100,RF,CS,GR 248</td>
</tr>
<tr>
<td>107615</td>
<td>BAG,STOPPING,C, GAS,4 IN,POLYESTER</td>
<td>113719</td>
<td>FLANGE,BLIND,3 IN,PN100,RF,CS,GR 248</td>
</tr>
<tr>
<td>138854</td>
<td>BAG,STOPPING,D, GAS,10 IN</td>
<td>112917</td>
<td>FLANGE,BLIND,4 IN,PN100,RF,CS,GR 248</td>
</tr>
<tr>
<td>138853</td>
<td>BAG,STOPPING,D, GAS,8 IN</td>
<td>113761</td>
<td>FLANGE,BLIND,6 IN,PN100,RF,CS,GR 248</td>
</tr>
<tr>
<td>108569</td>
<td>CAP,PIPE,10 IN,BW,9.3 MM,GR 290,CAT I</td>
<td>113767</td>
<td>FLANGE,BLIND,8 IN,PN100,RF,CS,GR 248</td>
</tr>
<tr>
<td>108355</td>
<td>CAP,PIPE,12 IN,BW,12.7 MM,GR 290,CAT I</td>
<td>112373</td>
<td>FLANGE,WELDNECK,10 IN,RF,PN100,9.3 MM,CS</td>
</tr>
<tr>
<td>108465</td>
<td>CAP,PIPE,2 IN,BW,3.9 MM,GR 241,CAT I</td>
<td>112508</td>
<td>FLANGE,WELDNECK,12 IN,RF,PN100,9.5 MM,CS</td>
</tr>
<tr>
<td>10898</td>
<td>CLAMP,PIPE REPAIR,2 IN,STL</td>
<td>128907</td>
<td>GASKET,FLG,10 IN,RW,PN100,RAISED,CS</td>
</tr>
<tr>
<td>118810</td>
<td>CLAMP,PIPE REPAIR,3 IN,STL</td>
<td>128908</td>
<td>GASKET,FLG,12 IN,RW,PN100,RAISED,CS</td>
</tr>
<tr>
<td>118901</td>
<td>CLAMP,PIPE REPAIR,ECONOMY,10 IN,STL</td>
<td>128903</td>
<td>GASKET,FLG,2 IN,RW,PN100,RAISED,CS</td>
</tr>
<tr>
<td>118871</td>
<td>CLAMP,PIPE REPAIR,ECONOMY,4 IN,STL</td>
<td>128904</td>
<td>GASKET,FLG,4 IN,RW,PN100,RAISED,CS</td>
</tr>
<tr>
<td>118879</td>
<td>CLAMP,PIPE REPAIR,ECONOMY,6 IN,STL</td>
<td>128905</td>
<td>GASKET,FLG,6 IN,RW,PN100,RAISED,CS</td>
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<tr>
<td>118885</td>
<td>CLAMP,PIPE REPAIR,ECONOMY,8 IN,STL</td>
<td>128906</td>
<td>GASKET,FLG,8 IN,RW,PN100,RAISED,CS</td>
</tr>
<tr>
<td>118847</td>
<td>CLAMP,PIPE REPAIR,NARROW ECONOMY,10 IN</td>
<td>131507</td>
<td>GASKET,S3,PN100,STYLE RW,RF,CS,CS</td>
</tr>
<tr>
<td>118826</td>
<td>CLAMP,PIPE REPAIR,NARROW ECONOMY,4 IN</td>
<td>136213</td>
<td>NIPPLE,PURGE,FLAT,THD-O-RING,2 IN,STL</td>
</tr>
<tr>
<td>118835</td>
<td>CLAMP,PIPE REPAIR,NARROW ECONOMY,6 IN</td>
<td>139099</td>
<td>NIPPLE,PURGE,FLAT,THD-O-RING,3 IN,CS</td>
</tr>
<tr>
<td>118842</td>
<td>CLAMP,PIPE REPAIR,NARROW ECONOMY,8 IN</td>
<td>121574</td>
<td>NIPPLE,PURGE,SAVE-A-VLV,1 IN,WE X THD</td>
</tr>
<tr>
<td>119550</td>
<td>CLAMP,PIPE REPAIR,STYLE 96,10 IN</td>
<td>121582</td>
<td>NIPPLE,PURGE,SAVE-A-VLV,2 IN,WE X THD</td>
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<tr>
<td>119557</td>
<td>CLAMP,PIPE REPAIR,STYLE 96,12 IN</td>
<td>137216</td>
<td>PIPE,CS,10 IN,9.3 MM,GR 290,CAT I</td>
</tr>
<tr>
<td>119534</td>
<td>CLAMP,PIPE REPAIR,STYLE 96,12 IN</td>
<td>137217</td>
<td>PIPE,CS,12 IN,9.5 MM,GR 290,CAT I</td>
</tr>
<tr>
<td>119542</td>
<td>CLAMP,PIPE REPAIR,STYLE 96,8 IN</td>
<td>137211</td>
<td>PIPE,CS,2 IN,3.9 MM,GR 290,CAT I</td>
</tr>
<tr>
<td>117914</td>
<td>COUPLING,STYLE 38 AG,10 IN X 10 3/4 IN</td>
<td>137212</td>
<td>PIPE,CS,3 IN,4.8 MM,GR 290,CAT I</td>
</tr>
<tr>
<td>118012</td>
<td>COUPLING,STYLE 38 AG,10 IN,CS,7 CTR</td>
<td>137213</td>
<td>PIPE,CS,4 IN,4.8 MM,GR 290,CAT I</td>
</tr>
<tr>
<td>117966</td>
<td>COUPLING,STYLE 38 AG,12 IN,CS,7 CTR</td>
<td>137214</td>
<td>PIPE,CS,6 IN,7.1 MM,GR 290,CAT I</td>
</tr>
<tr>
<td>120467</td>
<td>COUPLING,TRANSITION,2 IN X 2 IN,STUPE</td>
<td>137215</td>
<td>PIPE,CS,8 IN,8.2 MM,GR 290,CAT I</td>
</tr>
<tr>
<td>120467</td>
<td>COUPLING,TRANSITION,3 IN X 3 IN,STUPE</td>
<td>137216</td>
<td>PIPE,CS,10 IN,9.5 MM,GR 290,CAT I</td>
</tr>
<tr>
<td>120487</td>
<td>COUPLING,TRANSITION,4 IN X 4 IN,STUPE</td>
<td>114614</td>
<td>REDUCER,PIPE,12 IN,10 IN,WE,WE,CONC,CS</td>
</tr>
<tr>
<td>120411</td>
<td>COUPLING,TRANSITION,6 IN X 6 IN,STUPE</td>
<td>114295</td>
<td>REDUCER,PIPE,12 IN,10 IN,WE,WE,CONC,CS</td>
</tr>
<tr>
<td>109525</td>
<td>ELBOW,PIPE,CS,BW,12,12.7 MM,GR 290,CAT I</td>
<td>130903</td>
<td>REDUCER,PIPE,3 IN 2 IN,WE,WE,CONC,CS</td>
</tr>
<tr>
<td>110265</td>
<td>ELBOW,PIPE,CS,BW,12,12.7 MM,GR 290,CAT I</td>
<td>114459</td>
<td>REDUCER,PIPE,4 IN 3 IN,WE,WE,CONC,CS</td>
</tr>
<tr>
<td>109355</td>
<td>ELBOW,PIPE,CS,BW,2,2.3 MM,GR 241,CAT I</td>
<td>114491</td>
<td>REDUCER,PIPE,6 IN 4 IN,WE,WE,CONC,CS</td>
</tr>
<tr>
<td>110014</td>
<td>ELBOW,PIPE,CS,BW,2,2.3 MM,GR 241,CAT I</td>
<td>114779</td>
<td>REDUCER,PIPE,8 IN 6 IN,WE,WE,CONC,CS</td>
</tr>
<tr>
<td>130893</td>
<td>ELBOW,PIPE,CS,BW,3,4.8 MM,GR 10,405 KPA</td>
<td>115327</td>
<td>SADDLE,PIPE,10 IN 2 IN,STL</td>
</tr>
<tr>
<td>130894</td>
<td>ELBOW,PIPE,CS,BW,3,4.8 MM,GR 10,405 KPA</td>
<td>115501</td>
<td>SADDLE,PIPE,10 IN 3 IN,STL</td>
</tr>
<tr>
<td>109410</td>
<td>ELBOW,PIPE,CS,BW,4,4.8 MM,GR 241,CAT I</td>
<td>115341</td>
<td>SADDLE,PIPE,12 IN 2 IN,STL,REINF</td>
</tr>
</tbody>
</table>
Material Number | Description for London Warehouse | Material Number | Description for London Warehouse
--- | --- | --- | ---
109402 | ELBOW, PIPE, CS,BW,4.6 MM,45.LG,CSA Z245. | 115232 | SADDLE,PIPE,3 IN,2 IN,STL
109419 | ELBOW, PIPE, CS,BW,6.7 MM,45.LG,CSA Z24 | 115256 | SADDLE,PIPE,4 IN 2 IN,9.5 MM,STL,REINF
109485 | ELBOW, PIPE, CS,BW,6.7 MM,90.LG,CSA Z24 | 115428 | SADDLE,PIPE,4 IN 3 IN,STL
109447 | ELBOW, PIPE, CS,BW,8.12 MM,45.LG,CSA Z2 | 115281 | SADDLE,PIPE,6 IN 2 IN,12.7 MM,STL,REINF
110178 | ELBOW, PIPE, CS,BW,8.8 MM,90.LG,CSA Z24 | 115452 | SADDLE,PIPE,6 IN 3 IN,STL
109509 | ELBOW,CS,BW,10.9 MM,45.LG,CSA Z245.11 | 115305 | SADDLE,PIPE,8 IN 2 IN,STL
110244 | ELBOW,CS,BW,10.9 MM,90.LG,CSA Z245.11 | 115474 | SADDLE,PIPE,8 IN 3 IN,STL
131635 | FASTENER,STUDS,1/4 IN,8 1/2 IN,BT7,A193 | 102027 | SLEEVE,REPAIR,CLAMP, SPLIT,4 IN,STL
108684 | FASTENER,STUDS,1/4 IN,9 IN,ALLOY STL,2 | 118613 | SLEEVE,REPAIR,CLAMP, SPLIT,3 IN,STL,STD
108653 | FASTENER,STUDS,1/8 IN,7 1/2 IN,BT7,A193 | 102224 | SLEEVE,REPAIR,CLAMP, SPLIT,6 IN,STD
108617 | FASTENER,STUDS,1 IN,7 IN,ALLOY STL,B7 | 102256 | SLEEVE,REPAIR,CLAMP, SPLIT,8 IN,CS
108473 | FASTENER,STUDS,3/4 IN,5 IN,ALLOY STL,B7 | 102288 | SLEEVE,REPAIR,SPLIT,10 IN,1000 PSIG WP
108373 | FASTENER,STUDS,5/8 IN,4 IN,ALLOY STL | 101217 | SLEEVE,REPAIR,SPLIT,2 IN,1000 PSIG WP
108553 | FASTENER,STUDS,7/8 IN,6 IN,ALLOY STL,B7 | 102187 | SLEEVE,REPAIR,SPLIT,4 IN,STD
121926 | FITTING,STOPTAP,2 IN,CL600,WE,STD,CS | 119380 | SLEEVE,REPAIR,STYLE 220,10 IN
122085 | FITTING,STOPTAP,BTMT,OUT,10 IN,CL400,WE | 119391 | SLEEVE,REPAIR,STYLE 220,12 IN
122093 | FITTING,STOPTAP,BTMT,OUT,12 IN,CL400,WE | 119376 | SLEEVE,REPAIR,STYLE 220,8 IN
136508 | FITTING,STOPTAP,BTMT,OUT,4 IN,CL400,WE | 116073 | TEE,PIPE,10 IN,STR,WE,X COMP,9.3 MM,CS
137612 | FITTING,STOPTAP,BTMT,OUT,4 INX 3 IN,CS | 116091 | TEE,PIPE,12 IN,STR,WE,X COMP,9.5 MM,CS
139637 | FITTING,STOPTAP,BTMT,OUT,6 IN,CL400,CS | 115925 | TEE,PIPE,2 IN,STR,WE,X COMP,3.9 MM,CS
136509 | FITTING,STOPTAP,BTMT,OUT,6 IN,CL400,WE | 115937 | TEE,PIPE,3 IN,STR,WE,X COMP,5.5 MM,CS
139638 | FITTING,STOPTAP,BTMT,OUT,8 IN,CL400,CS | 115946 | TEE,PIPE,4 IN,STR,WE,X COMP,6 MM,GR 241
136510 | FITTING,STOPTAP,BTMT,OUT,8 IN,CL400,WE | 116024 | TEE,PIPE,6 IN,STR,WE,X COMP,7.1 MM,CS
116046 | TEE,PIPE,8 IN,STR,WE,X COMP,8.2 MM,CS

**4.13.2.2 Emergency Material List for Kingston Warehouse**

Material Number | Description for Kingston Warehouse | Bin Location | Material Number | Description for Kingston Warehouse | Bin Location
--- | --- | --- | --- | --- | ---
108473 | BOLT STUD 3/4 X 5 HEX NUT | Cube 4 | 107599 | GAS BAG 2" SAFETY MAIN TYPE C | Cube 8
108373 | BOLT STUD 5/8 X 4 1/2 HEX NUT | Cube 4 | 107606 | GAS BAG 3" SAFETY MAIN TYPE C NLAS | Cube 8
108553 | BOLT STUD 7/8 X 6 HEX NUT | Cube 4 | 107615 | GAS BAG 4" SAFETY MAIN TYPE C | Cube 8
108617 | BOLT STUD 1 X 7 HEX NUT | Cube 4 | 107625 | GAS BAG 6" SAFETY MAIN TYPE C | Cube 8
131835 | BOLT STUD 1 1/4 X 8 1/2 HEX NUT | Cube 4 | 138853 | GAS BAG 8" SAFETY MAIN TYPE D | Cube 8
108684 | BOLT STUD 1 1/4 X 9 HEX NUT | Cube 4 | 138854 | GAS BAG 10" SAFETY MAIN TYPE D | Cube 8
108653 | BOLT STUD 1 1/8 X 7 1/2 HEX NUT | Cube 4 | 138855 | GAS BAG 12" SAFETY MAIN TYPE D | Cube 8
108465 | CAP 2 BW 3.9MM 241 | Cube 7 | 128903 | GASKET 2 PN100 RF GRAPHOIL RW CS | Door
130892 | CAP 3 BW 4.8MM 241 | Cube 7 | 131507 | GASKET 3 PN100 RF GRAPHOIL RW CS | Door
108510 | CAP 4 BW 6.0MM 241 | Cube 7 | 128904 | GASKET 4 PN100 RF GRAPHOIL RW CS | Door
108298 | CAP 6 BW 7.1MM 290 | Cube 7 | 128905 | GASKET 6 PN100 RF GRAPHOIL RW CS | Door
108551 | CAP 8 BW 8.2MM 290 | Cube 7 | 128906 | GASKET 8 PN100 RF GRAPHOIL RW CS | Door
108569 | CAP 10 BW 9.3MM 290 | Cube 7 | 128907 | GASKET 10 PN100 RF GRAPHOIL RW CS | Door
108355 | CAP 12 BW 12.7MM 290 | Cube 7 | 128908 | GASKET 12 PN100 RF GRAPHOIL RW CS | Door
118810 | CLAMP 2 SKINNER | Cube 7 | 121574 | NIPPLE 1 SAVE A VALVE H17491 | Cube 7
118818 | CLAMP 3 SKINNER | Cube 7 | 121582 | NIPPLE 2 SAVE A VALVE 9930 H17491 | Cube 7
118826 | CLAMP 4 SKINNER NARROW ECONOMY | Cube 7 | 137211 | PIPE 2 BJ 3.9 290 | Outside
118871 | CLAMP 4 SKINDER WIDE ECONOMY | Cube 7 | 137212 | PIPE 3 BJ 4.8 290 | Outside
118835 | CLAMP 6 SKINNER NARROW ECONOMY NLAS | Cube 7 | 137213 | PIPE 4 BJ 4.8 290 | Outside
118879 | CLAMP 6 SKINNER WIDE ECONOMY | Cube 7 | 137214 | PIPE 6 BJ 7.1 290 | Outside
118842 | CLAMP 8 SKINNER NARROW ECONOMY | Cube 7 | 137215 | PIPE 8 BJ 8.2 290 | Outside
118885 | CLAMP 8 SKINNER WIDE ECONOMY NLAS | Cube 7 | 137216 | PIPE 10 BJ 9.3 290 | Outside
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### Emergency Material List for Sudbury Warehouse

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## Section 4 - Incident Response

### 4.13.2.4 Emergency Material List for Thunder Bay Warehouse

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<th>Description for THUNDER BAY Warehouse</th>
<th>Material Number</th>
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Emergency Preparedness and Response Program

Section 4 - Incident Response

Approver: Supervisor Emerg Resp Plng Syst Security

Issue Date: 2019-03
### Material Numbers and Description for THUNDER BAY Warehouse

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4.13.3 Emergency Warehouse Order Form

The following is an example of the Emergency Warehouse Order Form 8418 located on the Source.

**NOTE:** The Emergency Warehouse Order Form 8418 replaced the Emergency Material Request Form 8203.

---

**Emergency Warehouse Order Form**

- Request Date: 
- Requesting Manager: 
- Phone/Cell: 
- JO/Project #: 
- Location of Emergency (Address): 

**Head Office Duty Manager Approved (Name):**

**Emergency Warehouse**

- Unmanned:
  - Thunder Bay P300 Z002
  - Kingston P302 Z078
- Manned:
  - London P104 A001
  - Sudbury P301 Z032

**WAREHOUSE USE ONLY**

- Verbal Instructions Received:
  - Date: 
  - Time: 
  - Contact: 

- Date: 
- Time: 
- Material Shipped: 
  - Completed by: 

**London Manned Warehouse Order Sheet**

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<tr>
<td>106510</td>
<td>CAP 4 BW 6.0MM 241</td>
<td>$5.80</td>
<td></td>
</tr>
</tbody>
</table>
4.14 Emergency Aircraft

During a large-scale emergency, additional resources may be required to assist in the operation. The charter aircraft (Chartright Air Group) used by Union Gas may be required to transport resources to and from the emergency location.

Prior to requesting the aircraft, good business judgment should be applied and the following considerations reviewed.

4.14.1 Passengers

The charter aircraft can accommodate up to nine passengers and cargo depending on airport runway length and weather. The weight restriction for passengers and cargo is based on the number of passengers, weight of the cargo and the destination (fuel load).

4.14.2 Approval

Flights must be approved by the President or a Vice President.

4.14.3 Information required at the Time of Charter Aircraft Bookings

- Passenger List – including cell and telephone numbers
- Cargo – weight of tools and equipment
- Date and Time of departure
- Destination
- Duration of stay – does the aircraft need to stay with the passengers
- All flights should be directed to ONT UGL Travel or Daylene Turner and Willow Kelly

4.15 Fire Department Role and Responsibilities

4.15.1 Incident Response

4.15.1.1 Do:

- Set up a safety perimeter
- Evacuate all individuals within the perimeter if necessary
- Keep all people and equipment upwind
• Control all sources of ignition.
  • Shut off vehicles
  • Do not operate electrical devices

• Ensure all building openings are closed if the source of the outside leak is near the building.
• Check adjacent buildings, sewers and other structures for migration of natural gas.

4.15.1.2 Do not:
• Attempt to extinguish outdoor natural gas fires unless there is an immediate threat to life or property.
• Enter excavations.
• Attempt to stop the flow of gas from a broken pipe.
• Enter into any fenced-in gas company facility unless accompanied by a company employee.

4.15.2 Termination of Gas Supply
The fire department should only shut off gas supply to a building or residence if:
• Safety is an issue and you cannot wait for the gas company to respond
• Responders are trained and knowledgeable on how to shut off the gas meter valve
• Responders have the proper tool to shut off the gas meter valve (a wrench not to exceed 12 inches in length)
• Responders know the force required and what to look for when shutting off the gas meter valve

If the Gas supply is shut off by the fire department:
• Document the following and provide to the gas company:
  • The condition of the gas meter when the supply was shut off
  • The time the gas meter was shut off
  • The address (or addresses) of meters that have been shut off
• Once the supply has been shut off, it must remain off. Only a gas company employee or designate can turn the gas meter back on.
# Section 5 - Incident Recovery and Investigation

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<th>Title</th>
<th>Page</th>
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<td>5-1</td>
</tr>
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<td>Public Relations</td>
<td>5-1</td>
</tr>
<tr>
<td>5.3</td>
<td>Employee &amp; Family Assistance</td>
<td>5-2</td>
</tr>
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<td>5.4</td>
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## 5.5 Business Continuity

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- 5.5.2 Purpose
- 5.5.3 Criticality Definitions and Criteria
- 5.5.4 Business Continuity Plan Development
- 5.5.5 BCP Development Timeline
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## 5.6 Post Incident Investigations

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- 5.6.4 Gathering and Preserving Evidence
- 5.6.5 Tips on Conducting Interviews
- 5.6.6 Conducting an Investigation
- 5.6.7 Critical Injury/Fatality Investigations
- 5.6.8 Insurance and External Agencies Investigations
- 5.6.9 Incident Response Team Reporting
5.1 Clean Up

Post incident recovery activities should be initiated as soon as possible, preferably while response operations are still underway, under the direction of the Incident Commander.

Actions taken during response operations should be decided, whenever possible, with post incident recovery in mind.

- Recovery operations include:
- Inspections and investigations
- Repair of damaged structures
- Restoration of services such as power, heat and communications
- Clearing of access routes
- Restore damaged units to production
- Remediation.

Should further investigations be required it will be necessary to wait until the Inspector/Investigator releases the site.

5.2 Public Relations

When an incident results in off-site impacts, the Regional Director/District Manager or designate and the EOC Communications Coordinator will ensure that public relations activities are carried out in the appropriate manner. The priority is to demonstrate to the public that Union Gas is concerned for the safety of its neighbours. The Public should be directed to the Union Gas Emergency Number (877) 969-0999 for more information. Public relations activities may include:

- Clean up of debris
- Communicating Meetings to inform the public about the incident's causes and what the company is doing to prevent a recurrence
- Counselling services to company personnel and public affected by the incident.
5.3 Employee & Family Assistance

Employees affected by an incident may experience delayed/long term reactions.

Employee and Family Assistance Program is provided to Union Gas by Homewood Health. They would be used to hold sessions informing employees about the long-term implications of the incident. It is necessary to establish the company's position on the issue of job loss and retention of employees as early in the recovery phase of the operation as possible.

For first time appointments and counselling, refer to the EFAP page on ELink, online through Homewood.ca or by phone (800-663-1142).

5.4 Litigation

A legal firm may be retained to address the issue of post-incident litigation.

The firm will be contacted by the Legal or Insurance Services Department as early as possible following an incident where a Union Gas product or action has threatened or harmed a third party.

The contact names and numbers for the Internal Legal contacts are kept at Legal Services.

5.5 Business Continuity

5.5.1 Overview

Enbridge Inc. has a responsibility to its investors, customers, employees and the communities it serves to ensure measures are taken to prepare for the continuation of critical and essential business operations in the event of an emergency or significant business interruption.

The following Business Continuity Plans currently exist:

- Gas Control and Capacity Planning (critical)
- Gas Management Services (critical)
- Gas Supply and Business Development Sales & Services (essential)
- Regulatory Affairs Projects and Lands (deferrable)
- Payroll (essential)
- Accounts Payable (essential)
• Billing Support Centres (essential)
• Contact Centres and Credit Centre (critical)
• Contract Billing and Operational Support (essential)
• Customer Accounting (essential)
• Engineering, OMS, Major Projects and EHS (critical)
• Operations Administration (critical)
• P&D Centres (critical)
• STO sites (Dawn and Parkway) (critical)
• Information Technology (critical)
• Public Affairs (essential)
• Facilities (critical)
• Finance (deferrable)
• Human Resources (deferrable)
• Legal (deferrable)
• Procurement and Supply Chain Management (deferrable)

5.5.2 Purpose

The purpose of business continuity planning (or BCP) is to:

• Protect employees, contractors, customers, the public, information assets, physical assets, reputation and goodwill
• Minimize and mitigate losses from unexpected interruptions
• Ensure cost-effective measures are taken to prepare for continuation of critical and essential operations as quickly as possible after an interruption
• Assist in providing a coordinated and consistent approach to restoring critical infrastructure in the aftermath of a disaster
• Orient employees to their roles and responsibilities in accomplishing all of the above

5.5.3 Criticality Definitions and Criteria

Critical Process – considered mission critical and absolutely necessary for the organization to remain operational. Critical processes can include those that are key to supporting the operation of a critical asset, including those deemed as energy critical infrastructure.

Essential Process – required for maintaining control and smooth operation of the organization and without it, the organization would suffer a significant impact. Essential processes can include those that are key to supporting an essential asset.
Deferrable Process – recovery can be delayed since the loss of the process poses limited near-term impacts to the organization. However, the resumption of deferrable processes, in addition to critical and essential processes, does enable the organization to more effectively resume normal business operations.

A process that meets any of the four criteria below for the category will be considered either critical or essential. Note that any process that does not meet the criteria below could still be designated as critical or essential by senior management.

<table>
<thead>
<tr>
<th>Process</th>
<th>Critical</th>
<th>Essential</th>
</tr>
</thead>
<tbody>
<tr>
<td>A process that protects/prevents</td>
<td>Loss of life</td>
<td>Significant injury or destruction</td>
</tr>
<tr>
<td>A process that if lost or impaired for the time specified, would cause widespread hardship on the organization, staff, and/or the public</td>
<td>1-7 day outage</td>
<td>8-14 day outage</td>
</tr>
<tr>
<td>A process that if lost or impaired would result in the reduction of equity, cash or earnings in one of the following periods: Per 7 day period</td>
<td>≥ $1,000,000</td>
<td>≥ $500,000</td>
</tr>
<tr>
<td>On an annual basis</td>
<td>≥ $50,000,000</td>
<td>≥ $25,000,000</td>
</tr>
<tr>
<td>A process that if lost or impaired, would erode and negatively impact Enbridge’s image, brand or reputation</td>
<td>Significantly</td>
<td>Moderately</td>
</tr>
</tbody>
</table>
5.5.4 Business Continuity Plan Development

Step 1 – Process Risk and Ranking

- Confirmation of processes included in the BCP, their criticality, their owners and their relative ranking of importance in terms of recovery (in the event recovery resources are constrained)
- Executive and current plan owners are polled for changes in the business
- The process risk and ranking document is approved by the executive

Step 2 – Risk Assessment

- The identification and measurement of known threats to an organization
- Identifies and documents site or facility and business process risks
- Identifies actions for managing these risks using the:
  - Likelihood of occurrence (high, medium, low)
  - Effects/consequences of the occurrence (high, medium, low)
- Risk management options include mitigate, eliminate, transfer or accept

Step 3 – Business Impact Analysis

- A foundation for the plan; supports recovery time objectives
- Develops both financial (quantitative) and operational (qualitative) estimates of impacts from a disruption
- Identifies internal and external business dependencies
- Determines recovery times for critical and essential business processes
- Provides part of the foundation for determining recovery requirements, recovery strategy and the plan

Step 4 – Recovery Strategy

- Gathers detailed recovery needs and costs
- Develops recovery options, weighs advantages and disadvantages and associated costs
- Assists in the selection of the best strategy and alternate site
- Determines the potential for alternate operations, manual “work-arounds” and documents the procedures
- Coordinates with each supported and supporting area to ensure plans align with each area’s expectations
- Documents process recovery time objectives
• Documents reliance on critical applications (supported by the Disaster Recovery Plan) as well as necessary applications (not covered by the DRP) and stand-alone applications/technology
• Documents facility, computer and equipment requirements

Step 5 – Plan Development
• The documented, actionable plan with duties, roles and responsibilities for employees
• Identifies initial response actions
• Indicates disaster declaration and plan activation specifics
• Details vital records, recovery needs and assumptions
• Process call lists and call tree
• Other supporting documentation

Step 6 – Maintenance, Training and Testing
• Training helps management and staff to understand BCP concepts, their roles and responsibilities, recovery time objectives etc.
• Tests are designed to determine whether the plan will work, identify any gaps and/or enhancements
• Brings business/operating unit groups and support groups together in a “preparedness partnership”

Step 7 – Self-Assessment
• Process owners attest to the readiness of their planning activities (the plan itself, training, testing etc.)
• Typical BCP assessments include:
  • Related risks and corresponding impacts to the operating group have been validated
  • The recovery strategy is orderly, detailed and actionable
  • The support groups being relied upon will be there when called upon
  • The plan has been validated by appropriate testing (including the DRP where applicable)

NOTE: All BCP documentation, templates and reference material are stored on the BCPlan sharepoint site, including 7 years of historical documents
Section 5 - Incident Recovery and Investigation

Business Continuity Planning
“A Continuous Process”

- Verify Status in Program
- Analyze/ Mitigate Risk
- Analyze Business Impact
- Choose Business Partners
- Define Needs/ Assess Options
- Select/ Approve Strategy & Solution

- Reporting
- Tracking
- Self Assessment
- Test the plan, exercise the people
- Train Staff
- Document BCP (Plan)
- Implement Solution
5.5.5 BCP Development Timeline

A chronological view of the program:

5.5.6 Key Roles and Responsibilities

BCPC – Business Continuity Program Coordinator – responsible for maintaining the business continuity program, tools, templates, procedures and related resources by monitoring and applying industry best practices, working with operating unit personnel and other business unit BCPC’s. This role is filled by the Manager, Emergency Response Planning and System Security at Union Gas.

Plan Administrator – the employee appointed by the operating group process owner to guide all aspects of business continuity planning associated with that group (plan development, training, testing etc.)

Process Owner – the senior operating unit manager/director/VP who is accountable for the process, function or department covered by the plan.
5.5.7 Linkage with the Emergency Management Program

Emergency Management is a mandatory program covered by Enbridge’s Management System Framework and includes the following components: Crisis Management, Business Continuity, and Emergency Response (refer to section 1.8 in the Management System Framework). As such, Business Continuity is included in the annual review of the Emergency Management Program by both the Integrated Management System Steering Committee and the Integrated Management System Leadership Group.

In the event of a BCP activation, the Emergency Response Readiness Level will be declared as Full, requiring the activation of the Emergency Operations Centre (EOC) and potentially the Incident Support Team (IST). Refer to section 4.3 Emergency Readiness Levels in this manual.

5.6 Post Incident Investigations

5.6.1 Overview

An incident meeting one of the criteria listed in section 5.6.5 will be investigated or reviewed as soon as possible after the incident, based on the current Incident Review Process. Employees are to be instructed to leave the incident site as is following the incident. Unless items must be moved for safety reasons, all vehicles, equipment, tools and material are to be left exactly in their place when the incident occurred.

5.6.2 Emergency Response Evaluations and Post Incident Review / Investigation Criteria

Emergency Response Plan quality assurance should include drill evaluations and reviews of response to actual incidents. Properly conducted, these evaluations provide critical information on the value of the planning process, the quality of planning products and priorities for future improvements to the Union Gas Emergency Preparedness and Response Plan. These evaluations represent an opportunity to evaluate actual personnel performance, training program effectiveness, plan and procedure adequacy, and equipment and facility adequacy. Performance evaluations should be undertaken as soon as possible after a drill or incident. The recommendations from these reviews will be communicated as appropriate.

The criteria below indicate when an incident review or investigation will be conducted. Incident investigations will be conducted by Emergency Response Planning (Supervisor or Sr Advisor). The investigation will be done using the Systematic Cause Analysis Technique (SCAT). Incident reviews are less robust that investigations and are led by a designate from the impacted department – generally the manager responsible for the work/employee involved. The target completion timeframe for investigations and reviews is 10 business days. It is important to note that the completion timeframe is only a guideline in that there may be extenuating circumstances that could cause the investigation or review to extend beyond the target (e.g. Fire Marshall or TSSA investigation, availability of employees/witnesses).
### Criteria

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Who</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Incidents with an A3 or P3 severity or higher (Enbridge Incident Severity Matrix)</td>
<td>Emergency Response Planning</td>
<td>Investigation</td>
</tr>
<tr>
<td>Incidents caused by or influenced by a Union Gas employee or contractor</td>
<td>Emergency Response Planning, Construction &amp; Growth, STO Responsible Supervisor/Manager</td>
<td>Investigation or Review</td>
</tr>
<tr>
<td>Plant damage resulting from an inaccurate locate</td>
<td>Plant Damage Prevention, STO Responsible Supervisor/Manager</td>
<td>Review</td>
</tr>
<tr>
<td>Any plant damage on a 30% SMYS pipeline</td>
<td>Emergency Response Planning</td>
<td>Investigation</td>
</tr>
<tr>
<td>Incident where a cross-bore has been verified</td>
<td>Plant Damage Prevention, STO Responsible Supervisor/Manager</td>
<td>Review</td>
</tr>
<tr>
<td>Station relief valve activation (when required) or over-pressurization</td>
<td>Technician Manager, Station Engineering, STO Responsible Supervisor/Manager</td>
<td>Review</td>
</tr>
<tr>
<td>Station Emergency Shutdown (ESD)</td>
<td>STO Responsible Supervisor/Manager</td>
<td>Review</td>
</tr>
<tr>
<td>Incident at a customer premise where Union Gas had responded within the previous three months for the same reason</td>
<td>Utility Services Field Supervisor</td>
<td>Review</td>
</tr>
<tr>
<td>Security incidents that have impacted or could have impacted the safety of employees, contractors, or the public, or results in a significant adverse affect on property or the environment</td>
<td>Corporate Security</td>
<td>Review</td>
</tr>
<tr>
<td>At the discretion of</td>
<td>Director, Distribution Operations, Director STO or Supervisor, Emergency Response Planning</td>
<td>Investigation</td>
</tr>
</tbody>
</table>

**NOTE:** The results of all incident reviews must be communicated to the Supervisor or Sr Advisor, Emergency Response Planning & System Security.

For third party plant damages resulting from no locates or imprudent excavations, a formal review is not conducted. However, it is important to note that the following process is in place:

- All plant damages are reported to the TSSA for their follow-up as they determine necessary.

- On an annual basis, all contractors who caused damage to our plant are sent a letter from Union Gas with an offer to conduct an information session to review the Ontario One Call process, the TSSA guidelines for excavation, and a Dig Safe brochure.

If it is decided as a result of an incident review that a formal investigation is required, it will be passed on to Emergency Response Planning to schedule and conduct the investigation.
5.6.3 Investigation Preparation

When an incident occurs that is likely to result in an incident investigation (e.g. incidents caused or influenced by a Union Gas employee), it is critical that the accountable supervisor or designate initiate the investigation promptly. Speed and thoroughness are both essential to an effective investigation, since memories fade and evidence and witnesses can disappear. It is advisable for the accountable supervisor to ask another supervisor to accompany them to the incident site to assist in the gathering of evidence and documentation, and the conducting of interviews. It is understood that the timing and sequence of tasks associated with the investigation are secondary to the health and safety of our employees and the public.

5.6.3.1 Investigation Kit and Checklist

The following list of items to be included in the investigation kit is not exhaustive but serves as the minimum required:

- Interview forms
- Camera/Cell Phone
- Measuring tape & ruler
- Flashlight & batteries
- Large envelopes
- Note paper
- Graph paper
- Pens and pencils
- Investigation Checklist

The following checklist is intended to guide the investigator through the sequential steps necessary to conduct an effective investigation. If a second manager is present, the tasks can be divided up to make the investigation more efficient.
### Section 5 - Incident Recovery and Investigation

<table>
<thead>
<tr>
<th>Item</th>
<th>Action</th>
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</table>
| Survey the scene | • Make a list of the people who are/were present and should be interviewed  
• Scan the entire scene and itemize things that need to be explained  
• Make an initial sketch of the scene |
| Interview Witnesses | • If there are eye witnesses (non-employees), they should be interviewed first  
• All interviews are to be conducted individually |
| Collect physical evidence | • Take photographs and draw diagrams (where appropriate)  
• Identify equipment, tools and material being used  
• Gather meter and regulator information when required  
• Gather appliance information (name, model and serial number) when required  
• Detail the damage to equipment and tools if applicable  
• Note the housekeeping and general site conditions  
• Note weather conditions  
• Note lighting levels  
• Note noise conditions |
| Gather relevant background or supporting information (this is a sample and will vary depending on the type and scope of the incident) | • Procedure of Work  
• Hazard Assessment  
• C&M Procedure(s)  
• Training records  
• Competency assessments  
• Tool inspection forms  
• CGI identification number and calibration report  
• Other |
| Consultation with Experts | • Technical experts can be of assistance in technically complicated investigations  
• If material or equipment needs to be tested, contact Materials Engineering for direction |

### 5.6.4 Gathering and Preserving Evidence

Particular care must be exercised to ensure that all evidence is preserved in its original state. Where loss or damage to Union Gas property or loss of revenue has occurred, evidence will not be disturbed until permission has been received from any government agencies involved.
If an incident is being investigated by an outside agency, no person shall interfere with or disturb any wreckage, article or thing at the scene of an occurrence that is connected with it except in the interest of public safety, continuity of service or preservation of property until such time as an inspector has given permission to do so. – Investigative agencies may include: TSSA, MOL, MOE, Fire Marshal and Police. When preserving evidence, ensure that you:

- Do not withhold evidence or factual information from the authorities.
- Do not remove, alter, or disturb physical evidence without authorization from the investigating authority.
- Do not express personal opinions, however obvious they may appear, to investigating authorities or to anyone other than the senior investigating company authority, and then only in circumstances where such conversation is completely confidential. Be particularly cautious when using cellular phones or radio communications.
- Record the following pertinent information on the appropriate company form:
  - The setting of valves - open or closed
  - The name and address of any witnesses
  - The name and authority requesting removal, date removed, time, location, and description of the object
  - Any test carried out at the request of the investigating authority and note any changes or alteration to the physical evidence.
- Removing Evidence

If you need to remove evidence, you must:

- Photograph the object in place and after removal
- Complete the Evidence tag, Form 2106, and securely fasten it to the object. Evidence tags can be found in stationery supply or ICP kit.

5.6.5 Tips on Conducting Interviews

To obtain as untainted a version of the story as possible, employees/witnesses should be interviewed as soon as practicable after the incident. It is also critical that interviews are conducted individually. If employees/witnesses have the opportunity to discuss the incident among themselves, individual perceptions may be lost or altered in the normal process of accepting a consensus view where doubt exists about the facts. It is also important to consider the emotional state of employees/witnesses. Be aware of each person’s physical and emotional state and proceed with empathy and understanding to put each interviewee at ease. Put the person at ease by assuring them that the goal is fact finding to prevent a recurrence. Common causes for discomfort include:

- Fear (e.g. of being blamed, evaluated, disciplined)
- Past wrong doings – or perceptions thereof
- Concern about release of information
Interviewer not at ease

Incomplete knowledge of the topic

The interview location (e.g. lack of privacy)

If interviewees are under stress or you cannot speak to each one immediately, ask each one to write out what they saw happen during the incident in their own words. Interview each employee/witness afterwards, clearing up uncertainties or gaps as necessary.

Use open-ended questions as much as possible. The W5 method can be very useful when conducting an interview:

- What happened? What did you see or hear? What procedure was being used?
- Who was involved?
- Where did the incident happen? Where were you at the time? Where were the other employee’s? Consider asking the interviewee to draw a sketch showing their location and the location of others
- When did the incident occur?
- Why (or how) do you think the incident happened?

Pitfalls to avoid during the interview include:

- Don’t ask leading questions (e.g. “didn’t you think that…..”)
- Don’t intimidate the interviewee (be aware of your tone and body language)
- Don’t interrupt the interviewee or put words in their mouth
- Don’t make judgemental statements or jump to conclusions

End the interview on a positive note. Thank the interviewee for their time and candor, and ask them for their ideas on how the incident could be prevented in the future, or for process improvements.

NOTE: Follow up interviews may be required once all of the interviews are complete and as more evidence, such as photographs, becomes available.

5.6.5.1 Tips on Sketching

Sketch the scene as you found it upon your arrival. Ask and make note of anything that was moved prior to your arrival. Note and map the positions of workers, witnesses, tools and equipment, machinery and vehicles. The following tips are useful when drawing a sketch:

- Place the important information in the center of the sketch and draw the rest around it (don’t worry about artistic perfection)
- Take measurements and provide scale where appropriate
- Use direction arrows
- Attempt to draw each item relative to its location to other items as best you can
- Label items and individuals correctly
- Cross reference the sketch with pictures that are taken or the sketches of witnesses (be sure to reconcile any differences)

5.6.5.2 **Tips on Taking Photographs**
Photographs and video recording can prove to be invaluable when conducting an investigation. They should always be taken as soon as possible. Following are some techniques useful in taking photographs at incident scenes:

- Start by photographing the general area and then move to the specific scene of the incident
- Take photos from all sides and several angles, as well as close up and isolation shots
- Take photos from the location/perspective of workers/witnesses
- Include measurements and a reference scale where applicable
- Create a photo log which includes when the shot was taken (date and time of day), by whom, location, lighting conditions, what the shot contains, and identifying the photo number on a sketch of the incident scene

Cross reference the photos with the location of physical evidence and relevant notes

5.6.6 **Conducting an Investigation**

Prior to conducting the formal investigation, gather all evidence and relevant information (where applicable):

- Incident Overview document (who, what, when, where, weather, sequence of events/summary – template?)
- Interview notes
- sketches, photographs and photograph log
- Procedure of Work
- Hazard assessment
- Applicable C&M procedure(s)
- Training and competency assessment records
- Tool inspection forms
- DEOC documentation
- Other relevant information

The amount of evidence and relevant documentation will vary depending on the scope and nature of the incident. It is critical that whatever evidence and information is gathered is provided to the incident investigator as soon as possible following the incident, given the target of completing the
investigation within 10 business days on the incident. Technical or subject matter experts will be included in incident investigations where their expertise is warranted.

All incident investigations will be conducted using the Systematic Cause Analysis Technique (SCAT). A summary of this methodology is as follows:

- Identifying the Event Type (e.g. Abnormal Operation, Loss of Containment/Environmental Release, Equipment Failure).
- Determination of potential Immediate/Direct Causes (e.g. defective tools/equipment/material, failure to follow a procedure, inadequate instructions/communications, inadequate procedures)
- Determination of Basic/Root Causes

All incident reviews, including corrective actions will be documented in the Encompass application. Corrective actions will be tracked until completion and the incident investigation will remain open until all corrective actions have been completed. Where appropriate, High Value Learning Events (HVLE) will be prepared and distributed across the enterprise to increase awareness and leverage learnings.

### 5.6.6.1 Review Recommendations

Approved recommendations from an Incident Review will be added to the Emergency Response Program or other company procedures as appropriate. The results from the Post Incident Review will be under an internal controlled circulation for the individuals assigned with action items.

### 5.6.6.2 Solicitor / Client Privilege

A Post Incident Investigation will be performed after an incident where circumstances require protection under solicitor/client privilege. The initiation of this type of investigation must be requested by the Legal Department and approved by the EOC Director or Crisis Leader.

### 5.6.6.3 Investigation Results

The results from this Investigation are restricted and will be forwarded to the designated external council. Internal and external email communications concerning this event must also be controlled and restricted.
5.6.7 Critical Injury/Fatality Investigations

Following an incident where a fatality or a critical injury has occurred, notify appropriate government parties and EHS immediately. Government agency representatives will likely decide to carry out an investigation into either the extent or cause of the injury/fatality. The scene must be preserved, except for the purpose of; saving a life or human suffering, maintaining essential utility service or preventing unnecessary damage to equipment or other property. Specifically, work at the scene of the injury/fatality may not be resumed until permission has been obtained from the external agencies with jurisdiction. In these cases where change occurs, pictures should be taken where possible to capture the specifics of the scene.

When a government agency arrives on site and after presenting their credentials, the representatives are to be afforded full co-operation in the performance of their duties.

5.6.8 Insurance and External Agencies Investigations

Insurance companies and Government agencies may wish to conduct investigations of their own into an incident. Once they have shown their credentials, either the designated contact for the location or his alternate must accompany them.

5.6.9 Incident Response Team Reporting

During the course of a major incident investigation, written reports, statements, notes, photographs, videotapes, audiotapes, etc. are often generated. External cause and effect consultants and investigators may also be utilized as part of the investigation process. The distribution of the results will be coordinated through the designated legal counsel and/or lead investigator.
Section 6 - Notification and Contact Information - Internal

Redacted. This section contains internal contact information to be used in the case of an emergency, such as conference bridge numbers, satellite phone numbers, employee cell phone numbers and pager numbers. It is protected from publication under Clause 1(a) of Order MO-006-2016 because it discloses information about identifiable individuals and because there is a real and substantial risk that its disclosure will impair the security of Union Gas’ pipeline system, buildings, structures or systems.
Section 7 - Notification and Contact Information – External

7.1 Public Notification ........................................................................................................... 7-1
   7.1.1 IVR and Predictive Dialer ...................................................................................... 7-1
   7.1.2 Emergency Videotape “Natural Gas Emergency Shut-off and Restoration” .... 7-1
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7.3 External Agencies ............................................................................................................ 7-8

7.4 Redacted. This section contains the names and confidential direct dial phone numbers of staff members at external agencies, such as the Ministry of Energy, Ministry of Natural Resources etc. It is protected from publication under Clause 1(a) of Order MO-006-2016 because it discloses information about identifiable individuals.
7.1 Public Notification

7.1.1 IVR and Predictive Dialer

Incoming Voice Response (IVR) and the Predictive Dialer systems are available to pro-actively notify customers of an incident that has a wide spread community impact.

Normal or Alert readiness level events:

- The P&D supervisor has the option to use a standard script to notify customers via the predictive dialer.

Limited and Full readiness level events:

- Incident specific IVR and Predictive Dialer messages will be developed to communicate to the community. The use of these communication tools and the scripting will be decided at the time of the incident through discussions between the EOC Director and the EOC Communications Coordinator.

7.1.2 Emergency Videotape “Natural Gas Emergency Shut-off and Restoration”

In the event of a mass natural gas outage within a major community, the Crisis Leader (IST) may authorize the release of the Emergency Videotape “Natural Gas Emergency Shut-off and Restoration”.

In conjunction with the release of the video, the area impacted as a result of the outage, must be communicated to the media.

7.1.3 Contacting Municipal/Government Officials

In the event of a significant incident, local municipal representatives and government officials may be contacted by the Regional Directors/District Managers to demonstrate that Union Gas is concerned for the safety of the public. If there is no success in reaching the appropriate party, ensure that a message informing of the incident is left with a designate.
Section 7 - Notification and Contact Information – External

7.2 Contacting External Agencies

Notification to external agencies will be required for specific types of incidents. The following section outlines which external agency to notify in specific situations.

The District Duty Manager or DEOC Coordinator shall contact external agencies for the ICP, and where required notify the Head Office Emergency Manager of these contacts.

7.2.1 When to Contact the Spills Action Centre (SAC)

The Spills Action Centre must be contacted as soon as time allows during the early stages of an incident. Use 60 minutes from the onset of the incident as a guideline. The Spills Action Centre line enables notification to the TSSA (Technical Standards and Safety Authority) and the MOECC (Ministry of Environment and Climate Change).

- All pipeline damages resulting in a natural gas release must be reported to the Spills Action Center. This includes:
  - Plant damages to gas mains
  - Plant damages to services with or without an EFV installed
  - Damages to first stage cuts or meter sets (risers, regulators or meter)
  - Damages to stations
- Spills of product must be reported to the Spills Action Center. A spill is considered a Reportable Spill when:
  - There is an uncontained release of a product to water, land or air or
  - There is potential for local or extensive media attention or
  - There is environmental impact
    - confined to a small area onsite or minimal offsite (Spill) or
    - substantial onsite and extensive impact offsite (Major Spill)

Refer to Section 12 - EHS Programs, Processes and Procedures for additional detail.
7.2.1.1 Technical Standards and Safety Authority (TSSA) Specific Reporting

Contact the Spills Actions Centre, regarding an incident involving natural gas with the following situations:

1. **Injuries**
   - A pipeline incident resulting in a critical injury

2. **Natural Gas Leaks that result in**
   - An evacuation of 4 or more houses, a school, a care center, a public building or any large complex
   - A loss of service to 60 or more customers

3. **Media**
   - Any media coverage or potential coverage of a pipeline or natural gas related incident.

4. **Carbon monoxide** exposure has occurred due to a malfunction by a hydrocarbon fuel appliance under the following conditions:
   - Work was performed on the equipment in the past six (6) months by a service provider.
   - An abnormal safety condition exists which may be a result of a product defect OR an installation error.
   - Equipment failure in a rental property, where the occupant is not responsible for the maintenance of the equipment.
   - CO related injury as a result of problems with the equipment.

5. **Fires or explosions where**
   - Natural gas is suspected as the cause.
   - Natural gas or a gas appliance is directly involved in the fire or explosion or
   - The resulting fire has caused leakage at the meter set.
   - An injury or fatality occurs as a result of the fire or explosion.

6. **Iced over Regulator**
   - Resulting in an over pressure of the house piping by more than 2 psig.

If it is determined TSSA must come to the site, state that to the Spills Action Centre and that message will be passed on.
7.2.2 Roles and Responsibilities

7.2.2.1 Transportation Safety Board (TSB)

The Transportation Safety Board of Canada’s mandate is to advance transportation safety in the marine, pipeline, rail and air modes of transportation by

- Conducting independent investigations, including public inquiries when necessary, into selected transportation occurrences in order to make findings as to their causes and contributing factors
- Identifying safety deficiencies, as evidenced by transportation occurrences
- Making recommendations designed to eliminate or reduce any such safety deficiencies
- Reporting publicly on investigations and on the findings in relation thereto.

7.2.2.2 National Energy Board (NEB)

The NEB’s top priority in any emergency is to make sure that people are safe and secure, and that property and the environment are protected. Any time there is a serious incident; NEB Inspectors may attend the site to oversee a company’s immediate response. The NEB will require that all reasonable actions are taken to protect employees, the public and the environment. Further, the NEB will verify that the regulated company conducts adequate and appropriate clean-up and remediation of any environmental effects caused by the incident.

And/or

As lead regulatory agency, the NEB:

- Monitors, observes and assesses the overall effectiveness of the company’s emergency response in terms of:
  - Emergency Management
  - Safety
  - Security
  - Environment
  - Integrity of operations and facilities; and
  - Energy Supply
- Investigates the event, either in cooperation with the Transportation Safety Board of Canada, under the Canada Labour Code, or as per the National Energy Board Act or Canada Oil & Gas Operations Act (whichever is applicable).
- Inspects the pipeline or facility.
- Examines the integrity of the pipeline or facility.
- Requires appropriate repair methods are being used.
- Requires appropriate environmental remediation of contaminated areas is conducted.
- Coordinates stakeholder and Aboriginal community feedback regarding environmental clean-up and remediation.
• Confirms that a company is following its Emergency Procedures Manual(s) commitments, plans, procedures, and NEB regulations and identifies non compliances.
• Initiates enforcement actions as required.
• Approves the restart of the pipeline.

7.2.3 When to Contact the NEB/TSB

The Transportation Safety Board and the National Energy Board must be notified regarding incidents that involve the following facilities:

- Panhandle Eastern Pipelines (PEPL) River Crossing
- Blue Water pipeline crossing
- Vector
- St. Clair Pipeline Crossing

This notification will be made through the Head Office EOC, who will also complete the necessary NEB forms and documentation. For significant incidents, the TSB Hotline must be called immediately (refer to criteria below). For all other incidents, notification to the NEB is initiated through the Online Events Reporting System (OERS) which is found at https://apps.neb-one.gc.ca/ers. Notification must be made within 24 hours of the incident or discovery of the incident. For further information refer to the NEB Event Reporting Guidelines.

The following types of incidents for these facilities must be reported:

- Death or serious injury to a person
- Releases that may have a significant adverse impact on the environment
- Unintended fire or explosion
- Unintended or uncontrolled release of natural gas
- Operation of a pipeline beyond its design limits
- Any activity related to the construction of a facility across, on, along or under a pipeline, an activity that caused a ground disturbance within the prescribed area or the operation of vehicles or mobile equipment that the pipeline company considers could impair the safety or security of the pipe.

- All damage to a pipeline caused or identified during the construction of a facility across, on, along or under a pipeline, the operation, maintenance or removal of a facility, an activity that caused ground disturbance within the prescribed area or the operation of vehicles or mobile equipment across the pipeline
- The deterioration of facilities that could impair the safety or security of our pipelines (notification will be in writing to the Secretary of the Board)

Significant incidents are defined as a:

- Death or serious injury
- Missing person
- Fire or explosion that causes a pipeline or facility to be inoperative
- Pipeline rupture
- A toxic plume as defined in CSA Z662
Notification of the NEB only is required for:
- Any finding of significant Stress Corrosion Cracking

### 7.2.4 When to Contact the Ministry of Ontario Labour (MOL)

Refer to Section 8, Glossary for the definition of a critical injury or death.

For a critical injury or death,
- A local manager will contact the Head Office Emergency Manager immediately. The local manager will not contact the MOL.
- The Head Office Emergency Manager will contact EHS.
- EHS will contact the MOL immediately, and will provide a detailed report to the MOL within 48 hours.

### 7.2.5 When to Contact the Ministry of Natural Resources (MNR)

Notify the MNR any time that there is an uncontrolled release of product or waste from a wellhead.

### 7.2.6 When to Contact the Ministry of Energy

In the event that a natural gas supply emergency causes actual or potential loss which significantly impacts Ontario’s energy systems and its economy, the provincial or federal government may need to be involved. The decision to contact the Ministry of Energy will be made by the Crisis Leader and the contact will be made by the Director of Government Affairs or delegate. All Emergency Notifications should be directed to: EnergyNaturalGasNotifications@ontario.ca. Notifications to this address will be directed to the Minister’s staff, Deputy Minister, Assistant Deputy Minister, Senior Managers, Communications Staff and Emergency Management Unit Staff.

Notify the Ministry of Energy of a major gas supply outage in the following situations:
- There are substantial negative impacts on the health, safety, welfare and property of Ontario (e.g., during cold winter weather).
- A major portion of the entire natural gas distribution system is down.
- There is, or a potential exists for, a severe long term natural gas supply outage.
- The emergency is expected to be sustained for a period of time.
The ministry’s notification hierarchy is as follows:

<table>
<thead>
<tr>
<th>Level of Supply Interruption</th>
<th>Ministry Notification</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Local Gas Supply Interruption</td>
<td>At the discretion of the Director, External Affairs</td>
</tr>
</tbody>
</table>
| 2. Medium Scale Gas Supply Interruption           | • Notification of the Ministry should occur (who would then alert Emergency Management Ontario (EMO) accordingly)  
|                                                   | • Such emergencies may require a coordinated response from others in the sector.       |
|                                                   | • Exploration of options in averting an emergency situation may be considered.        |
| 3. Major Gas Supply Interruption                  | • The Ministry must be notified and supplied with adequate information for appropriate decision making by the Ministry in conjunction with EMO/Provincial Emergency Operations Centre (PEOC).  
|                                                   | • Occurs when the magnitude, duration, and frequency of the gas supply interruption could result in widespread health and safety concerns. |

Information to be requested by the Ministry on notification of a potential or actual energy supply interruption:

- Cause of the impending or actual energy supply interruption
- Location of gas supply interruption (which municipality and market participant are affected)
- Number of customer affected
- Restoration timetable
- Is there a potential for the incident to become a major energy supply shortage emergency
- Have emergency operations centres of affected energy stakeholders been placed on standby or activated?
- Communication plan with customers and media
- Who will be the designated communications spokesperson?
- Is provincial assistance required/anticipated?
- Contact name and phone number
- Other relevant information
7.3 External Agencies

External Agencies having legislation and regulations affecting emergency preparedness, response or recovery in Union Gas operations are listed below. Copies of relevant legislation and regulations are on file with the Legal Department.

- National Energy Board
- Environment Canada
- Ontario Energy Board (OEB)
- Ministry of Labour (MOL)
- Technical Standards Safety Authority (TSSA)
- Local Authorities
- Ministry of Environment & Climate Change (MOECC)
- Ministry of Natural Resources (MNR)
- Canadian Standards Authority (CSA)
- Canadian Gas Association (CGA)
7.4 External Contact Numbers

Redacted. This section contains the names and confidential direct dial phone numbers of staff members at external agencies, such as the Ministry of Energy, Ministry of Natural Resources etc. It is protected from publication under Clause 1(a) of Order MO-006-2016 because it discloses information about identifiable individuals.
## 8.1 Glossary

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alarms</td>
<td>Warning system put in place to notify people that an emergency has occurred or is about to occur. Can be used to mobilize Emergency Response Organization plus warn people of danger so that they can take steps to protect their own safety. See Section 4.3 for specific alarm descriptions.</td>
</tr>
<tr>
<td>Allocated Union downstream capacity</td>
<td>During a Trafalgar System curtailment, Union must share the remaining capacity with its ex-franchise customers supplied from this system. This allotment is based on Union Gas peak day demand compared to the total customer contract demand.</td>
</tr>
<tr>
<td>Briefings</td>
<td>Means used to pass information to selected groups. Can be used to address members of the Emergency Response Organization, the media, government and the public. Used to facilitate decision making within the Emergency Response Organization.</td>
</tr>
<tr>
<td>Business Continuity Planning</td>
<td>The objective of business continuity planning is to reduce the impact of a disaster or significant event on the company by providing a framework for restoring critical or essential business operations within a required timeframe and then maintaining them until normal operations are re-instituted.</td>
</tr>
<tr>
<td>Enterprise Crisis Management Team</td>
<td>A team comprised of senior level personnel who will carry our strategic crisis management response activities at the corporate level to address the implications of the problem and its potential on the Company’s viability, operability and credibility.</td>
</tr>
<tr>
<td>Crisis Leader</td>
<td>A member of the IST designated to oversee and coordinate the activities of the company during a full activation readiness level.</td>
</tr>
<tr>
<td>Crisis Management</td>
<td>A proactive operating philosophy that ensures that capabilities exist to mitigate, prepare for, respond to, and recover from a circumstance, event, or series of episodes that threaten to fundamentally affect or alter the way the organization conducts its business. It is broader in scope than emergency management and includes consideration of impacts on brand and image, legal liabilities and other business consequences.</td>
</tr>
<tr>
<td>Crisis</td>
<td>An event involving Union Gas facilities, products, services, policies, activities or employees that has the potential to threaten or affect the way the Enterprise does business. Crises may impact operations, employees or the communities in which Union Gas operates.</td>
</tr>
<tr>
<td>Incident Support Team</td>
<td>A group of business unit executives responsible for coordinating Union Gas’s response to a Force Majeure, coordinating resources to restore service and communications for public response.</td>
</tr>
<tr>
<td>Critical Incident Stress</td>
<td>Psychological and/or physical effects experienced by people who are involved in a crisis.</td>
</tr>
</tbody>
</table>
| **Critical Injury (as defined in the OHSA)** | An injury of a serious nature that:  
  a. places life in jeopardy  
  b. produces unconsciousness  
  c. results in substantial blood loss  
  d. involves the fracture of a leg or arm, but not a toe or finger  
  e. involves the amputation of a leg or arm but not a toe or finger  
  f. consists of burns to a major portion of the body  
  g. causes the loss of sight in an eye |
<p>| <strong>Curtailment</strong> | An unplanned suspension of gas deliveries caused by a physical failure or a high risk of failure on Union Gas system OR non-delivery of gas by a Union supplier into the system. |
| <strong>Customer Emergency Plan</strong> | A customer’s own plan by which a contract customer reduces its use of natural gas during a gas supply curtailment. |
| <strong>Declaring a Force Majeure</strong> | In compliance with the terms of the contract between Union and its customers, Union must advise the customer that a Force Majeure condition exists. Responsibility for making this declaration rests with the executive of Union Gas. |
| <strong>Delegates, Emergency Management</strong> | Individuals designated by management to act on their behalf in their absence during an emergency. |
| <strong>District Emergency Operations Centre (DEOC)</strong> | Facilities located in STO and each district office from which operating instructions are issued to the field staff and where the emergency is monitored. Local management staffs the center continuously during the emergency period. |
| <strong>Dwelling Unit</strong> | A housekeeping unit used or intended to be used as a domicile by one or more persons, and usually containing cooking, eating, living, sleeping and sanitary facilities. |
| <strong>ECMAP - Eastern Canada Mutual Aid Plan</strong> | The plan developed by the Local Distribution Center’s (LDC) with participation by TCPL where emergency supplies of gas are made available to each other. |
| <strong>Emergencies</strong> | Incidents that threaten human life, health, property and/or the environment, if not-controlled, contained, or eliminated promptly. Usually localized in scope and fast-moving, most emergency situations are addressed by facility plans and supplemented with business unit support, as needed. |
| <strong>Emergency Operations Centre (E.O.C.)</strong> | Facilities located in the Head Office from which operating instructions are issued to the field staff and where the emergency is monitored. Senior management employees from the Operations Administration, Gas Control Departments, Public Affairs and other groups relevant to the emergency staff the center continuously during the emergency period. |
| <strong>Emergency Operations</strong> | Actions taken to bring an emergency to an end. Descriptions of these actions are contained in the Emergency Response Plan. The goal of Emergency Operations is to protect the safety of the community and company personnel as well as to minimize any damage caused by an emergency. |</p>
<table>
<thead>
<tr>
<th><strong>Emergency Preparedness and Response Program (EPRP)</strong></th>
<th>Documented, structured approach to guiding company personnel through the steps of managing response to emergency situations.</th>
</tr>
</thead>
</table>
| **Emergency Repair** | An emergency repair is any repair that limits or stops the escape of gas, or that reduces the degree of hazard. Use emergency repairs only as a stopgap measure until additional help or equipment arrives. Then make a temporary or permanent repair.  
**NOTE:** Do not leave an emergency repair unattended, under any circumstance. |
<p>| <strong>Exercise</strong> | Examination of potential emergency situations for the purpose of evaluating Emergency Response procedures. |
| <strong>External Organization/Agency</strong> | A group who would have special knowledge or skills to assist in a specific area during an emergency. Not directly involved in Emergency Response. |
| <strong>Force Majeure</strong> | An unforeseen circumstance beyond the control of Union that will ultimately excuse it from its contractual obligation to supply gas to its customers. |
| <strong>Hazard Analysis</strong> | Subjective evaluation of factors that will create risk to Union Gas. |
| <strong>Hazard</strong> | A condition that exists which represents the potential to create danger. |
| <strong>Hazardous Materials (Haz-Mat)</strong> | Products and materials that can cause injury or death if they come in contact with a living organism. Usually chemical in nature, they can harm people, animals or vegetation. Harm is caused by means of direct contact, inhalation or ingestion. |
| <strong>Impaired Deliveries</strong> | This clause appears in the same contracts as the Priority of Service clause and requires that Union notify the customer if its ability to deliver the contracted demand is impaired. The buyer is entitled under the prior year’s contracts to their share of the available gas supply. The current clause only requires Union to notify the buyer of the impairment. |
| <strong>Incident Command Post (ICP)</strong> | The location where the management of site emergency operations is conducted. |
| <strong>Incident Response Team</strong> | A sub-team of the Incident Support Team, and is comprised of subject matter experts that are dispatched to the area of the crisis to assist in local response efforts. Members of the Incident Response Team are selected from the affected operating unit and appropriate support departments. |
| <strong>Incident</strong> | An event, series of events, or set of circumstances that impacts operations and requires a prompt, coordinated response beyond normal business processes. |
| <strong>Joint Information Center (JIC)</strong> | Managed by Public Affairs. JIC coordinates internal, external, and media communications. |
| <strong>Litigation</strong> | Legal action taken by a person or group of persons against Union Gas. Action may be for personal injury, loss of livelihood or damage to the environment. |
| <strong>Load Shedding Procedure</strong> | A company procedure implemented during a curtailment to balance demand with supply. |</p>
<table>
<thead>
<tr>
<th>Local Authorities</th>
<th>Government agencies that have responsibility over the area in which Union Gas operates.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major Customer</td>
<td>A customer that would attract the attention of Union Gas senior management in the event of an outage.</td>
</tr>
<tr>
<td>Make Safe</td>
<td>Upon arrival at an emergency situation the trained responder is to evaluate the scene; identify and mitigate visible hazards where possible; evacuate the scene as required; report back as needed to provide an update of the situation and advise if additional resources (people/tools/material) are required. After the scene has been made safe, repairs may be started.</td>
</tr>
<tr>
<td>MCR</td>
<td>Master Control Room located at the Dawn Operations Centre.</td>
</tr>
<tr>
<td>Minimum Required Demand</td>
<td>The daily rate required by large industrial customers during a curtailment to maintain a safe and viable operation.</td>
</tr>
<tr>
<td>Mitigation</td>
<td>To make an emergency less intense, serious or severe.</td>
</tr>
<tr>
<td>Mobilization</td>
<td>Transition from normal operations to emergency response. All resources needed to cope with the emergency situation are called out in this way.</td>
</tr>
<tr>
<td>Municipal Emergency Services</td>
<td>Fire, Police and Health agencies that provide protection to the community on an ongoing, daily basis supplemented by the Public Works Departments of the regional municipalities.</td>
</tr>
<tr>
<td>Nominated Volumes</td>
<td>Daily volumes required by Union Gas ex-franchise customers which are delivered by Union the following day through the Trafalgar system.</td>
</tr>
<tr>
<td>Non-essential Firm Market</td>
<td>The segment of Union Gas firm market that can be curtailed during a major gas supply emergency.</td>
</tr>
<tr>
<td>Peak Design Day</td>
<td>The maximum demand that a system is designed to deliver on the coldest winter day of –26 degrees Celsius.</td>
</tr>
<tr>
<td>Preparedness</td>
<td>A state of readiness for emergencies Union Gas maintains. Provides the capability to deal with emergencies when they arise.</td>
</tr>
<tr>
<td>Primary Responder</td>
<td>The responsibilities of this responder are to assess the situation, perform any initial duties required to make the situation safe from a natural gas perspective, and initiate the investigation and repairs.</td>
</tr>
<tr>
<td>Priority of Service</td>
<td>Union Gas' contracts state that: &quot;When required due to the curtailment or restrictions ordered by any authorized government agency, the buyer shall in accordance with the direction of Union, curtail or discontinue use of gas during the period in which Union Gas supply is jeopardized.&quot; Union is not liable for any loss of production or damage due to the curtailment or the length of advance notice given.</td>
</tr>
<tr>
<td>Program Coordinator</td>
<td>The role responsible for the creation and maintenance of the preparedness program of a specific discipline.</td>
</tr>
<tr>
<td>Re-allocation Procedure</td>
<td>A procedure used by the Gas Control Department for determining the magnitude of a supply shortfall on the Trafalgar system and to allocate the remaining capacity among the ex-franchise customers and Union itself for its in-franchise customers.</td>
</tr>
<tr>
<td><strong>Resources</strong></td>
<td>Materials, equipment and supplies used in Emergency Operations. Includes the skills and abilities of the people who will carry out Emergency Operations.</td>
</tr>
<tr>
<td>---------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Relocation Plan</strong></td>
<td>The alternate location (which could be an alternate DEOC or other location as applicable) that would be used if the primary building needs to be evacuated for any reason.</td>
</tr>
<tr>
<td><strong>SCADA</strong></td>
<td>Supervisory Control and Data Acquisition. This software program is used by Gas Control (Head Office and Dawn) to monitor and control gas supply within Union Gas pipelines.</td>
</tr>
</tbody>
</table>
| **Secondary Responder** | This responder has limited responsibilities and is dispatched to the site to assist the Primary Responder.  
  - The Secondary Responder will not initiate investigations or the repair.  
  - If first to arrive on site, they will make safe only and wait for qualified responder(s) to complete the investigation and repair. |
| **Security Threat Response Plan** | A system used to disseminate information regarding threat or security risks to company facilities and characterizes appropriate levels of vigilance, preparedness and readiness in a series of graduated threat conditions. |
| **Spills - Leak, Spill or Major Spill** | This does not refer to Natural gas releases.  
  A leak is defined as a contained release of a product from the system that has no environmental impact and can be cleaned up using internal resources. Leaks are reportable to the manager and EHS.  
  A spill is defined as an uncontained release of product to land or air that results in any of the following: actual or potential environmental impacts that are confined to site or minimal impact off site; and/or has the potential to draw minor or local public attention. All spills are reportable to the manager, EHS and the Spills Action Center.  
  A major spill is defined as an uncontained release of product to land, air or water, which results in or has the potential to result in any of the following; significant regulatory action; likely to cause significant adverse environmental impact beyond site; potential for extensive media attention and/or regulatory action. All Major Spills are reportable to the manager, EHS and Spills Action Center. |
| **State of Local Emergency** | The local authority of a municipality may, at any time when it is satisfied that an emergency exists or may exist, by resolution or, in the case of the Minister responsible for the Municipal Government Act, the Minister responsible for the Special Areas Act or a park superintendent of a national park, by order, make a declaration of a state of local emergency relating to all or any part of the municipality. |
| **Strategy** | The general plan or direction selected to accomplish incident objectives. |
| **Tactical Operations** | The operational methods by which the strategy will be implemented at the incident site. |
| **TSSAP – Trafalgar System Shortfall Allocation Plan** | A procedure used by Gas Control to determine and allocate shortfall in the event of a pipeline or compressor failure along the Dawn-Trafalgar transmission system during the operating season. TSSAP is used to predict the magnitude of the shortfall and provides guidance to minimize system impact. |
Section 9 - Security

Redacted. This section contains Union Gas’ internal Security Threat Response Plan for such things as bomb threats, suspicious mail/packages. It is protected from publication under Clause 1(a) of Order MO-006-2016 because it discloses information about identifiable individuals and because there is a real and substantial risk that its disclosure will impair the security of Union Gas' pipeline system, buildings, structures or systems.
Section 10 - Affiliates

10.1 Statement of Application .................................................................10-1

10.2 St. Clair Pipelines L.P.................................................................10-1

10.2.1 Redacted. This section contains the names and titles of Union Gas staff responsible for this affiliate organization. It is protected from publication under Clause 1(a) of Order MO-006-2016 because it discloses information about identifiable individuals.

10.2.2 Facilities.............................................................................10-1

10.2.3 Organization .......................................................................10-1

10.2.4 Alerting ..................................................................................10-1

10.2.5 Roles and Responsibilities.....................................................10-1

10.3 Market Hub Partners Canada L.P ..............................................10-2

10.3.1 Redacted. This section contains the names and titles of Union Gas staff responsible for this affiliate organization. It is protected from publication under Clause 1(a) of Order MO-006-2016 because it discloses information about identifiable individuals.

10.3.2 Facilities.............................................................................10-2

10.3.3 Organization .......................................................................10-2

10.3.4 Alerting ..................................................................................10-2

10.3.5 Roles and Responsibilities.....................................................10-2

10.4 Vector Pipeline L.P .................................................................10-3

10.4.1 Redacted. This section contains the name and title of a Vector staff member responsible for the operations of this organization. It is protected from publication under Clause 1(a) of Order MO-006-2016 because it discloses information about identifiable individuals.

10.4.2 Facilities.............................................................................10-4

10.4.3 Organization .......................................................................10-4

10.4.4 Alerting ..................................................................................10-4

10.4.5 Roles and Responsibilities.....................................................10-4

10.4.6 Emergency Notification Process........................................10-5
10.1 Statement of Application

Union Gas Limited provides operations and maintenance services to the Canadian pipeline portions of the following entities:

- St Clair Pipelines L.P. (Affiliate)
- Market Hub Partners Canada L.P. (Affiliate)
- Vector Pipeline L.P. (Non-Affiliate)

The Union Gas Emergency Preparedness and Response Program will be applied in accordance with Service Agreements with Union Gas Limited.

10.2 St. Clair Pipelines L.P.

10.2.1 Contact Information

Redacted. This section contains the names and titles of Union Gas staff responsible for this affiliate organization. It is protected from publication under Clause 1(a) of Order MO-006-2016 because it discloses information about identifiable individuals.

10.2.2 Facilities

St. Clair Pipelines L.P. is the owner of the following facilities operated by Union Gas Limited:

- Bluewater Pipeline System
- St. Clair River Crossing

10.2.3 Organization

Where the Incident Support Team (IST) is required during a major St. Clair Pipelines L.P. emergency situation, the following positions will be included in the IST (reference Section 3.2, “The Union Gas Incident Support Team”):

- Vice-President, St. Clair Pipelines Management Inc.

Manager, Business Development, St. Clair Pipelines Management Inc. will be available to the Emergency Operations Centre (EOC) as required.

10.2.4 Alerting

Manager, Business Development, St. Clair Pipelines Management Inc. will be notified of any incident regarding St. Clair Pipelines L.P. facilities that escalate to either a Limited or Full Readiness Level.

10.2.5 Roles and Responsibilities

The Union Gas Limited emergency response team will be responsible for contacting all regulatory agencies, such as NEB and NTSB on behalf of St. Clair Pipelines L.P. during an emergency situation.
Manager, Business Development, St. Clair Pipelines Management Inc. is responsible for coordination of St. Clair Pipelines L.P. Sales and Marketing, Customer Contact, and Regulatory Affairs activities during emergency situations.

President, St. Clair Pipelines Management Inc. is responsible for communication with Senior Enterprise Management and Executive during an emergency situation.

St. Clair Pipelines L.P. will participate in a Post Incident Investigation (reference Section 5.6, Post Incident Investigation).

10.3 Market Hub Partners Canada L.P.

10.3.1 Contact Information

Redacted. This section contains the names and titles of Union Gas staff responsible for this affiliate organization. It is protected from publication under Clause 1(a) of Order MO-006-2016 because it discloses information about identifiable individuals.

10.3.2 Facilities

Market Hub Partners Canada L.P. is the owner of the following facilities operated by Union Gas Limited:

- St. Clair Pool

Market Hub Partners Canada L.P. owns an interest in the following facilities operated by Union Gas Limited:

- Sarnia Airport Pool (Sarnia Airport Storage Pool Limited Partnership)

10.3.3 Organization

Where the Incident Support Team (IST) is required during a major Market Hub Partners Canada L.P. emergency situation, the following positions will be included in the IST (reference Section 3.2, “The Union Gas Incident Support Team”):

- Vice-President, Market Hub Partners Management Inc.

Manager, Business Development will be available to the Emergency Operations Centre (EOC) as required.

10.3.4 Alerting

Manager, Business Development will be notified of any incident regarding Market Hub Partners Canada L.P. facilities that escalates to either a Limited or Full Readiness Level.

10.3.5 Roles and Responsibilities

The Union Gas Limited emergency response team will be responsible for contacting all regulatory agencies, such as OEB and MNR, on behalf of Market Hub Partners Canada L.P. during an emergency situation.
Manager, Business Development will be responsible for coordination of Market Hub Partners Canada L.P. Sales and Marketing, Customer Contact and Regulatory Affairs activities during emergency situations.

President, Market Hub Partners Management Inc. will be responsible for communication with senior Enterprise management and executive during an emergency situation.

Market Hub Partners Canada L.P. will participate in Post Incident Investigations (reference Section 5.6, Post Incident Investigation).

10.4 Vector Pipeline L.P.

10.4.1 Contact Information

Redacted. This section contains the name and title of a Vector staff member responsible for the operations of this organization. It is protected from publication under Clause 1(a) of Order MO-006-2016 because it discloses information about identifiable individuals.
10.4.2 Facilities

Vector Pipeline L.P. is the owner of the following facilities serviced by Union Gas Limited:

- Vector Pipeline, Canadian Portion

10.4.3 Organization

Where the Incident Support Team (IST) is required during a major Vector Pipeline L.P. emergency situation, the following positions may be included in the IST (reference Section 3.2, “The Union Gas Incident Support Team”):

- President, Vector Pipeline

Director, Operations/Engineering, Vector Pipeline will be available to the Dawn Emergency Operations Centre (DEOC) as required.

10.4.4 Alerting

Director, Operations/Engineering, Vector Pipeline will be notified of any incident regarding Vector Pipeline L.P. facilities that escalates to either a Limited or Full Readiness Level.

10.4.5 Roles and Responsibilities

The Union Gas Limited emergency response team will be responsible for contacting all Canadian regulatory agencies, such as NEB and TSB, on behalf of Vector Pipeline L.P. during an emergency situation.

Director, Operations/Engineering, Vector Pipeline will be responsible for coordination of Vector Pipeline L.P. Sales and Marketing, Customer Contact and Regulatory Affairs activities during emergency situations.

Strategy Leader will be responsible for communication with senior Enbridge management and executive during an emergency situation.

Vector Pipeline L.P. will participate in Post Incident Investigations (reference Section 5.6, Post Incident Investigation).
10.4.6 Emergency Notification Process

The following flowchart describes the notification process during an emergency involving the Vector Pipeline.

Figure 10.5.1: Vector Pipeline Emergency Notification Flowchart

NOTE: Enbridge provides gas control services to Vector. Enbridge Gas Control would also provide emergency notification to Director, Operations Engineering Vector Pipeline. For external and internal notification, refer to the appropriate section in the plan.
Section 11 - Storage and Transmission Operations

Redacted. This section contains site specific emergency plans containing such things as emergency assembly areas, emergency coordinator responsibilities, and local emergency services contact numbers. It is protected from publication under Clause 1(a) of Order MO-006-2016 because there is a real and substantial risk that its disclosure will impair the security of Union Gas' pipeline system, buildings, structures or systems.

Section 12: District Specific
Section 12 - District Specific

Redacted. This section contains district specific emergency plan information such as the location of load shed valves. It is protected from publication under Clause 1(a) of Order MO-006-2016 because there is a real and substantial risk that its disclosure will impair the security of Union Gas' pipeline system, buildings, structures or system.