



300 Dufferin Avenue  
P.O. Box 5035  
London, ON  
N6A 4L9

January 26, 2011

DELIVERED BY EMAIL – HARD COPY TO FOLLOW IN MAIL

Kristen Walli, Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
27<sup>th</sup> Floor  
2300 Yonge Street  
TORONTO, ON M4P 1E4

Dear Ms Walli:

**RE: Board File No. EB-2010-0381**

The City of London objects to a written hearing and asks the Board for an oral hearing with the City of London being granted intervener status. The reasons for this are:

1. The Union Gas application is incomplete, and therefore premature for consideration. Schedule 17 of their pre-filed evidence includes no documented input on the project Environmental Review report, which is still within a review period.
2. The Union Gas application is based on an incomplete Environmental Report. Comments on the report have been requested by the applicant by February 16, 2011. The City of London will provide comprehensive comments by that date and wish these to be considered by the Board.
3. The Environmental Report only considered two alignments, both within existing road allowances, and therefore does not represent a complete evaluation of alternatives.
4. The routing of a gas pipeline within London's Wonderland Road North road allowance may produce negative outcomes by:
  - a. conflicting with existing and future municipal servicing, including watermain, sanitary sewers and storm sewers; and,

The Corporation of the City of London  
Office 519-661-2500 X 4936  
Fax 519-661-5931  
[pmcnally@london.ca](mailto:pmcnally@london.ca)  
[www.london.ca](http://www.london.ca)

- b. conflicting with existing and future road needs, including significant profile changes, widening to four through lanes, left and right turn lanes, intersections and roundabout traffic control options.

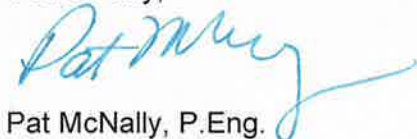
There is insufficient detail in the application upon which the City can ascertain existing and future impacts, and comment upon them.

5. The application indicates a location within the road allowance for the proposed gas pipeline has been set and possibly approved by the City. This is premature until the above questions have been resolved and the City is provided the opportunity to consider more detail on the matter within the context of its road and municipal servicing plans, and report these to the Board. The City requests that municipal interests be given greater consideration in this application.
6. The City of London is preparing an ultimate Wonderland Road profile and anticipates significant road grade changes that may be impeded by the proposed gas pipeline if the pipeline is not appropriately planned and designed. The City of London is presently coordinating various road allowance needs involving Planning Act applications.
7. The City of London is preparing a utility placement plan that includes future and existing sewers and watermain, the functional elevation of which may be impeded by the proposed gas pipeline if the pipeline is not appropriately planned and designed.
8. An inappropriately planned and designed pipeline will increase future costs to the City of London and Union Gas.
9. An inappropriately planned and designed pipeline will constrain the ability of the City of London to meet its municipal infrastructure requirements approved under the Environmental Assessment Act.

In summary, the application is premature because the supporting Environmental Report only considered road allowance options and does not include or rely upon City of London comments. Also, the level of municipal impact is not completely understood and needs a higher level of detail to be provided and considered by the City of London. Approving the application as submitted will lead to pipeline conflicts, future service disruptions and additional costs. More effort is required to protect the public interest. For these reasons, an oral hearing and the City of London being granted intervener status is requested.

The City will continue to discuss details of this proposal with Union Gas.

Yours Truly,



Pat McNally, P.Eng.  
General Manager of Environmental  
and Engineering Services & City Engineer City

- cc. Mark Murray, Manager, Regulator Projects & Land Acquisition, Union Gas Limited  
Dan Jones, Assistant General Council, Union Gas Limited  
Chris Traini, County Engineer, County of Middlesex