



Waterdown to Finch General Inquiries
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416.586.1915

VIA Email

August 13, 2019

Ms. Kristen Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

**Re: EB-2019-0007 – Imperial Oil Limited Application for leave to construct the Waterdown to Finch Project
City of Toronto extension request**

Dear Ms. Walli:

Imperial is prepared and would prefer to proceed with the Procedural Order No. 2 timelines as issued by the Ontario Energy Board (OEB), but acknowledges the City of Toronto request submitted on August 9, 2019 to delay the dates outlined by up to one month. Imperial does not take exception to an extension of up to two weeks (10 business days) and respectfully asks that the Board consider the following information as it relates to this request for extension:

1. Imperial understands that there is a large volume of material associated with the interrogatory responses and recognizes that this requires municipal resources to appropriately review. We wish to clarify that 44 pages of the 168-page response document and 350 pages of the 934-page appendices are directly related to questions posed by the City of Toronto.
2. Imperial is committed to meaningful engagement and to fully address all questions and concerns from the City of Toronto. We have been in communication with the City of Toronto since summer 2018 regarding access agreements, crossing agreements and temporary land use agreements. This communication is ongoing and Imperial will continue to work closely with the City of Toronto throughout the duration of the Waterdown to Finch Project.
3. Imperial has worked to align with the timelines directed by the OEB and has accommodated participants requesting additional review time and late intervenor status. Imperial took no exception to a one month delay as requested by the City of Mississauga, from Procedural Order No. 1 starting on June 14, 2019, to Procedural Order No. 2 starting on July 15, 2019. The dates set out in Procedural Order No. 2 were finalized on June 10, 2019. While Imperial recognizes that participation requires time and coordination for review, Project planning and associated activities are based on following the OEB timelines as closely as possible.
4. The OEB Leave to Construct is only one aspect of project progression. However, it affects subsequent activities. Secondary permits sought by Imperial from Provincial ministries and agencies in support of the Project typically require the Leave to Construct to be granted by the OEB prior to permit approval. Combined with other considerations, a cumulative two month delay in the OEB process will impact overall Project schedule. Imperial has been taking necessary actions to have this line in service within the anticipated timeframe, including adherence to this regulatory process.

As stated, Imperial's preference is to proceed with the OEB Leave to Construct timeline as outlined, but will not take exception to a two week (10 business days) extension for written submissions. This

extension timeframe would be manageable within the overall Project schedule. We recognize the effort to participate in the OEB-specific process and welcome continued engagement with intervenors throughout the Project as appropriate.

Should you have any further questions, please do not hesitate to contact me.

Regards,

A handwritten signature in black ink, appearing to read 'Jessie Malone', written in a cursive style.

Jessie Malone
Environmental and Regulatory Lead, Imperial

CC:
Ian Laing, Imperial
Zora Crnojacki, Ontario Energy Board
Michael Millar, Ontario Energy Board

Intervenors of Record in EB-2019-0007