

October 21, 2019

Ontario Energy Board
Attention: Christine E. Long,
Registrar and Board Secretary
2300 Yonge Street
27th Floor
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Ms. Long:

Re: EB-2019-0007 – Imperial Oil Limited Leave to Construct Pipeline and Associated Infrastructure – Procedural Order No. 5

On October 10, 2019, the City of Toronto filed a Notice of Motion pursuant to Rule 27.03 of the OEB's Rules of Practice and Procedure requesting that the OEB order the disclosure of the following information from the Applicant, Imperial Oil Limited:

1. The complete results of all audits, whether internal or external, conducted of Imperial's Safety and Loss Management System program, including Imperial's response to these audits;
2. A copy of Imperial's Integrity Management Program as required by CSA Z662-15 Clause 3.1.2 (f and v) and Clause 3.2, and complete details of all audits, whether internal or external, conducted of this Program including Imperial's response, and
3. The complete risk analysis performed on the existing line, and on the proposed replacement line indicating where consequence levels may have changed between the existing and proposed pipelines.

The Regional Municipality of Halton (the "Region") files this letter in support of the City of Toronto's motion and adopts the City of Toronto and City of Mississauga's reasons for the requested disclosure. The disclosure of this information is essential to the municipal intervenors' ability to assess risks posed by the proposed pipeline project and Imperial's approach to

Regional Municipality of Halton

HEAD OFFICE: 1151 Bronte Rd, Oakville, ON L6M 3L1
905-825-6000 | Toll free: 1-866-442-5866

managing those risks. Further, the Region respectfully submits that this disclosure will assist the Board in reaching a determination as to whether construction of the pipeline is in the public interest.

Sincerely,

A handwritten signature in blue ink, appearing to read "Meredith Baker". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Meredith Baker
Assistant Corporate Counsel

/tj