

October 28th, 2019

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

RE: Procedural Order No. 5 for application file EB-2019-0007

Dear Ms. Walli:

On behalf of the 2,500 members of Canadian Manufacturers & Exporters (CME), I am writing in response to Procedural Order No. 5 for application file EB-2019-0007.

Manufacturing is the most critical business sector in Ontario. It directly accounts for over 12 per cent of GDP and 80 per cent of exports. Through their extensive operations, manufacturers generate significant economic spinoffs throughout the economy and Ontario's communities, including in natural resources. Factoring in these economic spin-offs, manufacturers drive nearly 30 per cent of all economic activity, 25 per cent of all jobs, and one-third of all government revenues.

CME acknowledges the important role the Ontario Energy Board (OEB) plays in ensuring that the public interest is addressed, as enshrined in its legislative and procedural duties. As an intervenor, CME affirms that Imperial has acted in accordance with the requirements of the leave to construct process. There has been sufficient opportunity to raise questions about all aspects of the application, including project need, construction and operational safety, and environmental security, and Imperial has responded reasonably to all inquiries and requests.

While safety is always the top priority, CME believes the current requests made by certain intervenors under Procedural Order No. 5 are more appropriately the subject of other technical regulatory processes, covered by the TSSA, and that the additional, unnecessary requests could place timing constraints on the project. In our view, we believe that the modernization of Imperial's fuel system infrastructure and the broader supply-chain benefits it brings to Ontario is very much in the public's interest, and the negative impacts of further potential delays should be considered closely in reviewing the specific requests.

Additionally, CME believes that the fuels that will continue to be delivered through Imperial's replacement pipeline support the productivity and ability to reach markets that is crucial to competitiveness in this area.

We strongly believe that ensuring that Ontario has an efficient, reliable and interconnected fuel supply network is vitally important to our province's economic growth and Imperial is being proactive in supporting this network. In our view, effective regulatory processes and frameworks are critical to encouraging new investment in the province, particularly for proactive maintenance projects of this nature, which includes significant emphasis on timeliness, scope and predictability.

In closing, CME maintains that there has been sufficient input into the leave to construct process for the OEB to proceed with a fair and timely review and we continue to strongly support Imperial's Waterdown to Finch Project. We believe that this project will yield broader benefits for Canadian manufacturers by ensuring the reliable supply of high-quality fuel products to help meet operational demands and help fuel businesses and households throughout the Greater Toronto Hamilton Area (GTHA).

Please don't hesitate to contact me if you have any questions or require additional information.

Sincerely,



Alex Greco

Director, Manufacturing Policy