



January 24, 2020

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

RE: Final submission to support application file EB-2019-0007 (Waterdown to Finch Project)

Dear Ms. Long:

On behalf of the 2,500 members of Canadian Manufacturers & Exporters (CME), I am writing in response to Procedural Order No. 6 for application file EB-2019-0007, Imperial Oil's Waterdown to Finch Project, to provide our final submission and expression of support for the Project's prompt approval.

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.

Ontario's manufacturing sector relies on access to safe, reliable and affordable energy to maintain its competitiveness and deliver the products used by households and businesses in Canada and around the world every day.

Imperial's Waterdown to Finch Project reflects critical infrastructure renewal to ensure Ontario and its manufacturing sector continue to have access to safe and reliable energy products. The gasoline, diesel and jet fuel transported to and used in the Greater Toronto Area and throughout the province as a result of this pipeline is foundational to many manufacturers' supply chains. Imperial's products fuel the cars, trucks, buses and planes that facilitate the movement of both goods and people to attract investment and diversify Ontario's economy.

Our association believes that the modernization of Imperial's fuel system infrastructure is very much in the public's interest and the company has acted in accordance with the requirements of the leave to construct process. The province should support and encourage private sector investments that ensure continued safety and reliability of regional infrastructure. Additionally, we believe that effective regulatory processes





and frameworks are critical to encouraging this investment in the province, particularly for proactive maintenance projects of this nature, which includes significant emphasis on timelines, scope and predictability for proponents.

CME strongly supports the approval of Imperial's Waterdown to Finch Project. In addition to enhancing the long-term safety and reliability of their existing operations, this project will yield broader benefits for Canadian manufacturers by ensuring the reliable supply of high-quality fuel products to help meet operational demands.

Thank you for the opportunity to comment. Please don't hesitate to contact me if you have any questions or require additional information.

Sincerely,

Alex Greco

Director, Manufacturing Policy