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Our File No. 339583-270

February 10, 2020

By Electronic Filing

Christine Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

Dear Ms. Long

**Re: Enbridge Gas Inc. (“EGI”)
Leave to Construct Application and Request for Review of IRP Proposal
Board File No. EB-2019-0159**

We are counsel to Canadian Manufacturers & Exporters (“CME”). Please consider this letter to be CME’s submission as set out by Procedural Order #1 in the above-noted proceedings.

A. The Draft Issues List

CME has reviewed the Draft Issues List provided by the Board as part of Procedural Order #1. CME does not have any additions to the issues list as drafted.

B. The Scope of the Leave to Construct Proceeding

In Procedural Order #1, the Board requested submissions on whether the proceeding should include:

1. impacts related to the methods of upstream natural gas extraction (such as hydraulic fracturing) for natural gas that will be transported through the pipeline; and
2. impacts related to the ultimate downstream consumption of the natural gas transported through the pipeline. (collectively, the “Proposed Additional Issues”)

CME represents 400 Ontario-based member companies, which represent 75% of manufactured output in the Province of Ontario, and 90% of all exports. A vast majority of CME’s members are small to medium sized businesses, with 500 employees or less. CME’s members rely on natural gas to operate, and are therefore vitally concerned with natural gas planning and supply in Ontario.

This concern includes the construction of new pipelines in Ontario to ensure the safe and reliable supply of affordable energy to the businesses powering Ontario's economy.

With respect to the Proposed Additional Issues, CME recognizes the importance of climate change, including both upstream extraction methods and downstream consumption patterns of natural gas. However, CME submits that the Proposed Additional Issues would be more effectively and efficiently dealt with through other mechanisms, such as other Board proceedings, or public policy decisions and regulation at the provincial or federal level.

Currently, the OEB hears a number of applications by EGI and other utilities that touch on or deal with the impact of natural gas use. Examples of these proceedings include the annual federal carbon pricing proceedings, regular demand-side management proceedings, and natural gas utilities' broader rebasing applications.

In addition to the OEB, natural gas use is subject to a number of other regulatory standards aimed at balancing the use of natural gas with climate change, such as the Federal Clean Fuel Standards.

Given the foregoing, CME submits that the Proposed Additional Issues would be dealt with more effectively and efficiently in the context of other existing mechanisms that are focused on the climate impacts of natural gas use, rather than EGI's current leave-to-construct application.

Yours very truly



Scott Pollock

c. Adam Stiers (EGI)
Charles Keizer (Torys LLP)
Intervenors in EB-2019-0195
Alex Greco (CME)

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