

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

March 10, 2020

**Re: EB-2019-0159 2021 Dawn Parkway Expansion Project  
Pollution Probe Letter**

Dear Ms. Long:

Pollution Probe is in receipt of Procedural Order No.2 dated March 6, 2020 and Enbridge's letter dated February 27, 2020 including mitigation photomosaics that were omitted from the 2021 Dawn Parkway Expansion Project: Kirkwall-Hamilton Pipeline Project Environmental Report.

As requested in Procedural Order No. 2, Pollution Probe confirms that it intends to submit evidence in this proceeding and has included the intended nature of this evidence below.

- Materials that assess the alignment of the filing with requirement under the OEB's Environmental Guidelines and assess the environmental and socio-economic impacts related to the project.
- Materials that assess the alignment of the filing with Provincial policy and related guidance documents.
- Materials that assess alternatives to the proposed project.

Pollution Probe also notes that Enbridge's mitigation photomosaics completed in February 2020 and recently circulated to the Ontario Pipeline Coordination Committee (OPCC) are a requirement of the OEB's Environmental Guidelines for a complete filing. It is typical to provide sufficient time for OPCC review and comments related to the complete Environmental Report and all related mitigation documents and for the proponent to file all final OPCC responses once they are received. This timeline is typically several months and even with an expedited review request to the OPCC, it would not be possible to receive and file all OPCC (and related authorities listed in the OEB Environmental Guidelines) responses prior to the March 27, 2020 deadline for interrogatories to Enbridge. Pollution Probe also notes that the OEB approved issues list includes consideration of all outstanding matters related to permits and approvals. Approval of permit requests based on the recently completed mitigation plans will take time.

Instead of moving the deadline for interrogatories, Pollution Probe suggests that the Board include a second round of interrogatories in late April assuming that all OPCC responses are available and filed by mid-April. That will enable Enbridge to resolve most interrogatories by the April 20 deadline and turnaround any interrogatories related to the second round prior to the end of May.

Respectfully submitted on behalf of Pollution Probe.

Original signed by

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