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**Our File No. 339583-270**

May 11, 2020

By Electronic Filing

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

Dear Ms. Long

**Re: Enbridge Gas Application to construct natural gas pipeline and associated facilities in the City of Hamilton  
Board File No. EB-2019-0159**

We are counsel to Canadian Manufacturers and Exporters (“CME”). Please consider this letter to be CME’s submission pursuant to Procedural Order #6 in the above-noted proceedings.

In its letter of May 4, 2020, Enbridge Gas Inc. (“EGI”) requested an adjournment of EB-2019-0159, and proposed to report back to the Board within six months regarding whether it could continue with the application as filed as the result of COVID-19 impacts. EGI did not provide responses to undertakings, which were due on the same day, May 4, 2020 pursuant to the Board’s Procedural Order #5.

CME agrees with EGI’s request for an adjournment on the terms set out in its May 4, 2020 letter. COVID-19 has had far reaching impacts on every part of Canada, including on market conditions for energy and construction goods and services. Furthermore, in CME’s view, there will continue to be uncertainty regarding the long-term effects of COVID-19 for the foreseeable future.

If EGI were to complete interrogatory responses at this time, it would be a snapshot of current conditions. Given the level of uncertainty regarding EGI’s current application, CME submits that a supplementary round of interrogatories would be required in six months or a year regardless of whether EGI answers the current outstanding questions.

Accordingly, in CME's view, interrogatory responses at this time would likely be duplicative with future efforts and are therefore unnecessary.

Yours very truly

**Borden Ladner Gervais LLP**

A handwritten signature in blue ink, appearing to read "Scott Pollock".

Scott Pollock

c. Adam Stiers and Guri Pannu (EGI)  
Charles Keizer (Torys LLP)  
Intervenors in EB-2019-0159  
Alex Greco (CME)

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