

Elson Advocacy

October 19, 2023

BY EMAIL & RESS

Henry Ren

Counsel

Enbridge Gas Inc.

500 Consumers Road

North York ON M2J 1P8

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Dear Mr. Ren:

**Re: Motion to review decisions in EB-2022-0156/0248/0249
Ontario Energy Board File No. EB-2023-0313**

I am writing on behalf of Environmental Defence to request that Enbridge cease construction on the three gas expansion projects referenced above and to put Enbridge on notice that it bears any related legal and financial risks of proceeding with those projects prior to a determination of the review motion.

We only learned yesterday that Enbridge is continuing with construction despite the ongoing review of the decisions for those projects. We have not requested a stay and we believe a stay of the decisions is not necessary because Enbridge bears the risk that the OEB could grant the review and ultimately make any number of different decisions in those cases. Those decisions could have financial impacts for Enbridge. If Enbridge declines to halt construction, it bears those risks.

There is no urgency with these projects. Enbridge could proceed along the same schedule as other gas expansion projects that are planned for 2024. It would appear best to us to wait until a final determination before expending further resources.

Yours truly,



Kent Elson

cc: Registrar and intervenors in the above applications