

Ms. Nancy Marconi  
OEB Registrar  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

December 5, 2024

**EB-2024-0200 St. Laurent Project Leave to Construct**  
**Pollution Probe Response to Enbridge Letter**

Dear Ms. Marconi:

Pollution Probe is in receipt of Enbridge's letter dated December 5, 2024 in which it informs Pollution Probe and the OEB that Enbridge is refusing to provide the requested document pertaining to the DNV initial review of Enbridge's Quantitative Risk Assessment, more specifically the "St. Laurent Pipeline – Risk Review" version dated February 10, 2023. Per the evidence filed with the OEB and as summarized in Pollution Probe's December 3, 2024 letter, this document was created under contract with Enbridge and provided to Enbridge February 10, 2023<sup>1</sup>. Enbridge has custody of this document and is in a position to file it with the OEB.

Pollution Probe requests that the OEB require Enbridge to file this document. The relevance of this document to the proceeding is outlined in Pollution Probe's request letter dated December 3, 2024. Enbridge's letter further highlights the importance of the report as a key document for OEB consideration. DNV has been absent from the proceeding to provide direct answers related to the analysis it undertook with Enbridge, particularly given the large number of revisions requested by Enbridge. Provision of the February 10, 2023 draft version of the report would provide required clarity to understand what review, analysis and recommendations DNV provided Enbridge before Enbridge collaboratively updated the report several times. As Enbridge has surmised, if Enbridge simply made administrative edits to the report, that will be adequately apparent once the February 10, 2023 version is filed.

Furthermore, Enbridge has indicated in its letter that "we understand the earlier draft document may not have related to the final risk assessment report..."<sup>2</sup>. This further reinforces the importance of providing the document. If the February 10, 2023 version of the report includes information that was not carried forward to the final report, it will be important to

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<sup>1</sup> EB-2024-0200, Exhibit I.1-PP-24, Attachment 5, Page 2.

<sup>2</sup> EGI letter response to PP 20241205

understand why. The Enbridge QRA is the primary foundation Enbridge has put forward to support its preferred option of Full Replacement and having a full and transparent record related to the DNV review is foundational to the proceeding.

Respectfully submitted on behalf of Pollution Probe.

A handwritten signature in black ink, appearing to read "Michael Brophy", is positioned above a horizontal line.

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