

ONTARIO ENERGY BOARD

EB-2024-0342

IN THE MATTER OF the *Ontario Energy Board Act*, 1998, S. O. 1998, c. 15, Schedule B;

AND IN THE MATTER OF an application by Enbridge Gas Inc. for approval to construct gas works in an expanded area in Tay Valley Township

AFFIDAVIT OF NOELLE REEVE

I, NOELLE REEVE, of Tay Valley Township, in the Province of Ontario, hereby
AFFIRM:

1. I am the Manager of Planning and the Building Department for Tay Valley Township ("TVT"). As such, I have knowledge of the information in this affidavit. Where I refer to information from others, I state the source of such information, and I believe all such information to be true.

Background and introduction

2. I have been the Manager of Planning and the Building Department for TVT for over 16 years. In that role I have been involved in a number of matters relating to the climate and natural gas, including the TVT Climate Action Plan. My academic credentials include a Bachelor of Science in Environmental Studies and a Master of Science in Community and Regional Planning. I am a Registered Professional Planner with the Ontario Professional Planners Institute.

3. TVT opposes the request from Enbridge to expand the area in which it can construct and maintain natural gas infrastructure. Enbridge's request is inconsistent with the TVT Climate Action Plan, the TVT declaration of a climate crisis, and the position TVT has taken on related issues. Enbridge's request is also an affront to the democratic role of TVT as Enbridge did not meaningfully consult with TVT or discuss alternative options. An appropriate process to assign the right to construct gas infrastructure, if such a right needs to be assigned, would allow TVT to assess and consider alternative entities that may be more in keeping with our goals and climate plan and to do so on our own timeline.

Inconsistency with TVT policies

4. Enbridge's request is inconsistent with the TVT Climate Action Plan. The Climate Action Plan is attached as **Exhibit "A"** to this affidavit. The Climate Action Plan calls for reductions in fossil fuel consumption and greenhouse gas emissions. It also specifically highlights natural gas as a particular concern. The Climate Action Plan states as follows:

Natural gas is a particular concern as the climate crisis worsens. Where natural gas was once seen to be a good transition fuel between the most polluting of the fossil fuels – coal and oil – and renewable sources of energy, in recent years it has become clear that it is a particular contributor to climate change. Natural gas is primarily methane, and methane has a global heating effect that is more than 80 times that of carbon dioxide in the first 20 years after it is released. However, the global heating potential of methane is under re-evaluation as recent research shows greater releases of fugitive methane from storage, pipelines, flaring and wells, and from permafrost and the ocean. (p. 34)

5. TVT plans to reduce fossil fuels, not increase their consumption and expand the pipelines that deliver fossil fuels.

6. The approvals requested by Enbridge Gas are particularly concerning because they relate to possible construction of fossil fuels pipelines long in the future in the former townships of North Burgess and South Sherbrooke. There are no gas pipelines in or near those former townships. Our understanding is that there are no plans to build pipelines into those former townships at this time, which means that the approvals are for pipeline construction long into the future. Although new fossil fuel pipeline construction in 2025 is inconsistent with TVT's Climate Action Plan, that is even more so the case for fossil fuel pipelines to be constructed in, say, 2035.
7. It is important to emphasize that the expanded approvals that Enbridge Gas is asking for relate to potential *new* fossil fuel pipelines in the former townships of North Burgess and South Sherbrooke. Any economic justification for the construction of new fossil fuel pipelines would require extending the use of fossil fuels long into the future and long past the time when net zero greenhouse gas emissions must be achieved. Enbridge Gas already has permission to maintain and construct gas pipelines in the former township of Bathurst, and TVT is not asking the Ontario Energy Board to revoke this permission.
8. Enbridge's requests are also inconsistent with TVT's declaration of a climate crisis, which is attached as **Exhibit "B."** The main part of the resolution reads as follows:

Tay Valley Township officially declares a climate change crisis for the purposes of naming, framing, and deepening our commitment in our climate action plan to protecting our local ecosystems, local economy, and our community from climate change;

9. The preamble to the resolution reads as follows:

WHEREAS, climate change annually contributes to hundreds of billions of dollars in property and infrastructure damage worldwide, stressing local to national and international economies;

WHEREAS, climate change jeopardizes the health and risks the extinction of millions of species worldwide, stressing and weakening the health and integrity of ecosystems everywhere;

WHEREAS, climate change harms the health and security of people through intense wildfires, flooding, storms, droughts, rising sea levels, the spread of invasive insects bearing diseases, negative impacts on agriculture, and food supply interruption, thus further stressing social, economic, and political systems;

WHEREAS, there is now a large body of evidence and climate change risk scenarios which point to the imperative for steep and permanent reductions in greenhouse gas emissions, immediately and in the coming decades, in order to avoid many climate change "tipping points" which, if crossed, will render further and devastating ecological, economic, and societal losses;

AND WHEREAS, a crisis can be defined as "a dangerous situation requiring immediate action

10. I believe the facts outlined in this resolution and the TVT Climate Action Plan are true.

11. Expanded approvals to construct fossil fuel pipelines in TVT are inconsistent with the reality that we are in a climate change crisis and with the deepened commitment to the Climate Action Plan that TVT Council has committed to.

Inconsistency with democratic will and choice

12. If an entity must be granted approval to construct gas pipelines in the former townships of North Burgess and South Sherbrooke, the process to select that entity should allow TVT to explore relevant factors and consider options. That has not occurred here.

13. Enbridge Gas has not meaningfully engaged with TVT regarding its request for expanded approvals to build gas pipelines in TVT. It did not ask TVT whether it

agrees with this request before applying for an order from the Ontario Energy Board. It also did not present TVT with any options, such as the option to amend the existing certificate to make it clear that it continues to only cover the area of the former township of Bathurst.

14. If there were the prospect of gas pipeline construction in the former townships of North Burgess and South Sherbrooke, TVT would likely explore whether there are entities that could do so more in keeping with TVT's goals and Climate Action Plan. For instance, TVT would likely explore whether other entities could provide renewable natural gas created from local agricultural operations in a local system, instead of fossil fuels piped in from outside the province.
15. In exploring different entities, TVT would also consider issues relating to customer protection. For example, TVT would likely explore the allegations that Enbridge Gas has engaged in deceptive marketing.
16. However, there is no need for TVT to explore these options or issues at this time as there does not appear to be any interest in extending existing gas pipelines into areas that are not currently covered by the existing permissions that Enbridge Gas already has. The existing pipelines in the former township of Bathurst are not close to the former townships of North Burgess and South Sherbrooke. Also, there is no Franchise Agreement in place for those areas.
17. It seems doubtful that interest in extending gas pipelines into the former townships of North Burgess and South Sherbrooke will ever arise because of

factors such as distances and costs. Therefore, it is not a good use of TVT' scare resources to consider the issue further at this time.

Summary

18. No certificate covering the former townships of North Burgess and South Sherbrooke should be granted at this time. The request of Enbridge Gas to extend its permissions to cover these areas is premature, unnecessary, and inconsistent with TVT's policies and democratic will.

AFFIRMED REMOTELY BY video)
conference by Noelle Reeve stated)
as being at the Township of Tay)
Valley, Province of Ontario, before)
me in the Township of Tay Valley,)
Province of Ontario on this 23rd day)
of July 2025, in accordance with O.)
Reg. 431/20, Administering Oath or)
Declaration Remotely.)



Notary Public and Commissioner
for Taking Affidavits
David Poch



NOELLE REEVE