

November 28, 2025

**Via E-Mail & RESS**

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File no. G10017497

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

Dear Ms. Marconi:

**Re: EB-2024-0325: Glendale Community Expansion Project**  
**Mohawk Council of Akwesasne Written Submissions**

Please accept the enclosed Written Submissions from MCA pursuant to Procedural Order No.3, in the above-noted matter.

Sincerely,

Gowling WLG (Canada) LLP



Adam Chamberlain

cc: Patricia Squires, Enbridge - Manager, Regulatory Applications  
Tania Persad, Enbridge - Senior Legal Counsel  
Judith Fernandes, OEB - Case Manager  
Lawren Murray, OBE - Counsel  
Mohawk Counsel of Akwesasne

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## **ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15, Schedule B, and in particular, subsections 90(1) and 95(2);

**AND IN THE MATTER OF** an Application by Enbridge Gas Inc. for an Order exempting Enbridge Gas from the requirement to obtain leave to construct natural gas pipelines and associated facilities in the Township of South Glengarry in the United Counties of Stormont, Dundas and Glengarry

## **COMMENTS OF THE MOHAWK COUNCIL OF AKWESASNE**

**November 28, 2025**

## INTRODUCTION

1. These are the written comments of the Mohawk Council of Akwesasne (“**MCA**”) in respect of the updated evidence filed by Enbridge Gas on October 8, 2025. Enbridge Gas revised its evidence, filing an updated Consultation Report.
2. The Ontario Energy Board (“OEB”) issued Procedural Order No. 3 in this proceeding on November 5, 2025 (the “Procedural Order”) and, in so doing, took this proceeding out of abeyance.
3. In the Procedural Order the OEB provided MCA and OEB staff with an opportunity to file written comments on the October 8, 2025 evidentiary update.
4. Through a combination of inadvertence and MCA staff being unavailable when the Procedural Order was issued, MCA was unable to file these written comments by the November 14 deadline contained in the Procedural Order.

## REQUEST FOR COMEMNTS TO BE FILED LATE

5. Given the fact that MCA staff were unavailable when the Procedural Order was issued, MCA hereby requests the OEB permit these comments to be filed outside of the time period set out in the Procedural Order.
6. It is the position of MCA that, given the nature of these comments, no prejudice will be experienced by Enbridge Gas as a result of the timing of the submission of these comments.

## COMMENTS

7. MCA has reviewed and considered the updated evidence, including the updated Consultation Report, filed by Enbridge Gas on October 8, 2025 and can confirm the factual basis of Enbridge Gas’ claims in their submission.
8. More particularly, MCA confirms that capacity funding was provided by Enbridge Gas and a site visit was conducted. Further, MCA declined an offer from Enbridge Gas to deliver a community presentation.
9. MCA can also confirm that it has maintained continued engagement with Enbridge Gas through in-office meetings and the exchange of email.

10. Having confirmed these facts as described by Enbridge Gas, MCA wishes to emphasize the importance of meaningful consultation in the future in keeping with the on-going nature of the delegated aspects of the Crown's duty to consult MCA, and other Indigenous organizations should this project proceed,
11. Finally, MCA wishes to ensure that consultation by Enbridge Gas related to this Project continues in an appropriate and respectful manner going forward.

## CONCLUSION

12. MCA is pleased that consultation with the Crown, *via* Enbridge Gas, has continued. However, as MCA has stated in the past, consultation is not a mere procedural checkmark. MCA has asserted and established Aboriginal and Treaty rights around the north shore of the St. Lawrence, including the Project area, as well as other legal interests. Continued meaningful consultation must account for these considerations and provide opportunity for MCA to participate in on-going discussions.
13. MCA looks forward to consultation by Enbridge Gas related to this Project in the appropriate and respectful manner that has been experienced recently.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED by:**



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**GOWLING WLG (CANADA) LLP, per:**

Adam Chamberlain

Counsel to MCA

November 28, 2025