

May 11, 2020

**VIA RESS**

Ms. Christine E. Long  
Registrar and Board Secretary  
**ONTARIO ENERGY BOARD**  
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Dear Ms. Long:

**Re: EB-2019-0159 – Enbridge Gas Inc. (EG) 2021 Dawn Parkway Expansion Project.**

**Industrial Gas Users Association (IGUA) Submissions on EG Adjournment Request.**

As provided for by Procedural Order No. 6 herein, we write on behalf of IGUA to provide submissions on EG's request to adjourn this proceeding for up to 6 months. IGUA supports the adjournment request, in the unique circumstances of COVID-19 and the attendant and extended Government of Ontario declared state of emergency in the province.

Subject always to procedural safeguards for the legitimate interests of other parties to a regulatory proceeding, applicants should have latitude to manage the prosecution of their applications. In the instant case EG clearly has a reasonable basis for seeking a temporary adjournment. No party is prejudiced by such request.

We have considered the submissions by some parties to the effect that EG should be required, as a condition of adjournment, to file interrogatory responses (IRRs). Given that the basis for the adjournment is the very real potential for the circumstances initially supporting the proposed project to materially change, we see no reason for requiring that EG file its IRRs now. This is our view in respect of the non-pipes alternatives related (Issue 3) IRRs as well as all other IRRs. Information regarding non-pipes alternatives to the project brought forward through this application, and the context for that information, might change as a result of the COVID-19 state of emergency. It will remain EG's obligation, if and when the instant application is resumed, to demonstrate that it considered non-pipes alternatives to the project in a timely and complete way. To the extent that there is information regarding this project which remains relevant to the now separated IRP proceeding [EB-2020-0091], interrogatories posed in that proceeding, within the particular scope and context of that proceeding, can appropriately elicit that information.

To the extent that the Board is persuaded to direct response to IRRs, or any other interim steps in the instant proceeding, then the date for the filing of interim cost claims should be set so as to allow cost eligible parties to review any IRRs responded to, or engage in any other interim steps directed, prior to filing interim Statements of Costs.

Yours truly,



Ian A. Mondrow

c:     A. Stiers (EGI)  
       G. Pannu (EGI)  
       C. Keizer (Torys)  
       M. Seers (Torys)  
       S. Rahbar (IGUA)  
       Z. Crnojacki (OEB Staff)  
       Intervenors of Record

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