



**ONTARIO  
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7 October 2016

Ms. Sheri Young  
Secretary of the Board  
National Energy Board  
517 10 Avenue SW  
Calgary, AB  
T2R 0A8

VIA PARTICIPATION PORTAL

Re: Energy East Pipeline Ltd. and TransCanada Pipelines Limited  
Energy East Project and Asset Transfer, and Eastern Mainline Project  
File Number OF-Fac-Oil-E266-2014-01 02  
Notice of Motion  
Whole versions of the Consolidated Application

Dear Ms. Young:

The Ontario Rivers Alliance (ORA) is an intervenor in the Energy East Pipeline Project. ORA is writing to make a Notice of Motion in the above referenced matter.

### **Notice of Motion**

The following provisions will be made available to all stakeholders and Intervenor's without delay:

1. A whole and single file version of the Consolidated Application (CA);
2. A single file version of each Volume; and
3. A Table of Contents, complete with hyperlinks.

### **Statement of Facts**

In a letter dated 3 February 2016, the Board instructed Energy East Pipeline Ltd. (EEPL) to file a consolidated version of the application for the Energy East Project. On the 3<sup>rd</sup> of March 2016, the National Energy Board (NEB) notified intervenors that it had reviewed the table of contents and structural map that EEPL provided, as well as a plan detailing how it would address future supplemental filings and updates, and then provided stakeholders with a link to where the documentation was available for viewing.

Upon accessing the CA, it was very disappointing to discover that the application was not consolidated at all, but instead each volume, chapter, section, addendum, appendix, etc., was broken up into multitudes of individual pdf documents. This fragmentation of documents effectively removes the ability of the stakeholder to efficiently use the search function to scour the entire application for specific information.



## Grounds

It is unacceptable that the NEB has not required the Applicant to provide a CA that is user-friendly and whole, so that stakeholders can easily access and search such a massive application. The current CA version impedes the ability of the stakeholder to efficiently and effectively search the application. Additionally, the Table of Contents would be much more useful in assisting the viewer to navigate to the relevant section if it utilized hyperlinks.

## Request

ORA requests that EEPL be required to provide a version of the CA that can be accessed and/or downloaded as one whole document, as well as a single file version of each Volume. This would make the CA more user friendly and workable, and allow stakeholders to utilize the search function to find key information in a more efficient and timely manner. The Table of Contents should also be hyperlinked to allow the viewer to more quickly move to the relevant sections of the CA.

Accordingly, ORA requests that the NEB ensure that the above provisions are made available to all stakeholders without delay.

Respectfully,

Linda Heron  
Chair, Ontario Rivers Alliance