



Ontario  
Energy  
Board | Commission  
de l'énergie  
de l'Ontario

BY EMAIL AND WEB POSTING

March 29, 2021

To: All Regulated Entities  
All Other Interested Parties

Re: **Updates to Performance Standards and Other Process Improvements**

In keeping with its commitment to modernize, promote accountability and provide greater predictability for regulated entities and other interested stakeholders, the Ontario Energy Board (OEB) has updated its performance standards for certain types of applications. Effective April 1, 2021, updated performance standards will apply to the processing of Leave to Construct applications and Motions to Review.

Also, to enhance the effectiveness of Leave to Construct applications, the OEB will be introducing a standard issues list for each type of Leave to Construct application (electricity and natural gas respectively). While the OEB will begin applying these issues lists for applications filed with the OEB starting April 1, 2021, the OEB will consider whether amendments are warranted based on experience with the issues lists over time.

The changes described in this letter are responsive to stakeholders' expressed desire for greater predictability in terms of application processing timelines, and contribute to the OEB's efforts to embody the characteristics of a top-quartile regulator in its operations.

### **Updated Performance Standards for Leave to Construct Applications & Motions to Review**

Performance standards outline the typical procedural steps associated with processing a particular type of application and the typical number of calendar days for each step.

The current performance standards for Leave to Construct applications and Motions to Review were established in 2009. Since that time, the OEB's regulatory practices and requirements have evolved, as have the type and complexity of the applications that come before it.

In developing its updated performance standards, the OEB was informed by a review of historical application processing timelines and performance standards used by other regulators, such as the Alberta Utilities Commission and the Canadian Energy Regulator.

### *Performance Standards and Performance Measures for Leave to Construct Applications*

The OEB's current total cycle time for Leave to Construct applications is determined by hearing type (i.e., oral or written). Through an analysis of past Leave to Construct applications, it was identified that application complexity influences the time required for review and processing, and this is not necessarily related to the type of hearing. Accordingly, the OEB is establishing one performance standard for more complex applications and one performance standard for more straightforward applications. This is consistent with the OEB's approach for rate applications.

Along with the performance standards, the OEB developed criteria for assessing which performance standard will apply to Leave to Construct applications. This is included in Appendix A and posted on the OEB's [website](#). These criteria are intended as a guide. The actual performance standard that will apply will depend on the exact nature of the application and its content, including any requests that may not be reflected in Appendix A.

Total cycle time for both of these performance standards is the number of days from the issuance of a completeness letter<sup>1</sup> to the issuance of the final decision. The OEB will report two measures for application processing performance for Leave to Construct applications:

1. Time elapsed from the close of the record to the issuance of the final decision (Decision Writing Period)
2. Total cycle time – from issuance of a completeness letter to final decision

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<sup>1</sup> The OEB conducts a preliminary review of each Leave to Construct application to ensure the information presented is complete and consistent with the filing requirements, as applicable. The OEB will not commence a proceeding until the OEB is satisfied that any deficiencies have been addressed. The OEB will strive to communicate the results of the preliminary review in 14 calendar days.

The table below details each of these performance measures:

		Elapsed Calendar Days	
		Decision Writing Period	Total Cycle Time
Leave to Construct	Complex Electricity & Natural Gas	60	210
	Short-form Electricity & Natural Gas	30	135

The updated performance standards are included in the schedules set out in Appendix B and posted on the OEB's website. The actual procedural steps and timelines for individual proceedings may vary, and may be affected by statutory holidays. Applicants intending to file leave to construct applications are encouraged to contact OEB staff in advance of their filing.

#### *Performance Standards for Motions to Review*

Currently, the total cycle time for Motions to Review is determined by hearing type (i.e., oral or written). An analysis of past Motions to Review revealed that the type of motion influences the time required for review and processing. Specifically, the time to hear a Motion to Review is influenced by whether new evidence is filed that requires time for discovery. Accordingly, the updated performance standards reflect the type of motion rather than the hearing type.

Total cycle time for these performance standards is the number of days from receipt of the motion to the issuance of the final decision. The OEB will report two measures for application processing performance for Motions to Review:

1. Time elapsed from the close of the record to the issuance of the final decision (Decision Writing Period)
2. Total cycle time – from receipt of the motion to the final decision

The table below details each of these performance measures for Motions to Review:

		Elapsed Calendar Days	
		Decision Writing Period	Total Cycle Time
Motion to Review	New Evidence / Facts or Change in Circumstances	60	165
	Error (no discovery)	60	135

These updated performance standards are included in the schedules set out in Appendix C and posted on the OEB's website. The schedules identify all of the typical procedural steps as well as the number of days for each step. The actual procedural steps and timelines for individual motions may vary, and may be affected by statutory holidays.

### **Revision to Scheduling of Issues List Process for Rate Applications**

By letter dated March 11, 2019, the OEB announced new [performance standards](#) for processing rate applications. Currently, the published schedule for Cost-Based >\$500 Million Revenue Requirement applications contemplates that the issues list process will occur before the interrogatory process. By contrast, the published schedule for Cost-Based <\$500 Million Revenue Requirement applications contemplates that the issues list process will occur after the filing of interrogatories.

Approving the issues list earlier in a proceeding provides more clarity to parties on the scope of the proceeding to inform interrogatories. The OEB is therefore advancing the issues list process to an earlier point in the schedule for Cost-Based <\$500 Million Revenue Requirement applications, and this will be reflected in the performance standard posted on the OEB's website for these applications.

The total cycle time for these applications remains unchanged. This change will take effect for rate applications filed on or after April 1, 2021.

### **Issues Lists for Leave to Construct Applications**

The development of new, standard issues lists for Leave to Construct applications will assist in ensuring that the OEB's review is focused and aligned with its mandate. Appendix D sets out the standard issues list for electricity and natural gas Leave to Construct applications. The issues lists are also posted on the OEB's website. The OEB recognizes that some cases can raise unique issues, and the schedule for complex Leave to Construct cases as set out in Appendix B contemplates that submissions on the issues list may be needed. The OEB anticipates that the standard issues lists will be sufficient for applications to which the Short-form performance standard applies.

Any questions relating to this letter should be directed to Industry Relations at [industryrelations@oeb.ca](mailto:industryrelations@oeb.ca).

Yours truly,

*Original Signed By*

Lynne Anderson  
Chief Commissioner

## **Appendix A**

Criteria for Application of Leave to Construct Performance Standards

Below are the criteria that will inform whether the Complex performance standard will apply to a Leave to Construct (LTC) application. Section references in the table are to sections of the *Ontario Energy Board Act, 1998*.

**Criteria for Complex Application Performance Standard**

<b>Electricity LTC Applications</b>	<b>Natural Gas LTC Applications</b>
<ol style="list-style-type: none"> <li>1. Relates to a greenfield project</li> <li>2. Project requires a capital contribution or involves a complex economic evaluation or contestable connection procedure</li> <li>3. One phase of a broader or multi-phase project</li> <li>4. Involves significant new land rights</li> <li>5. If approved, will result in significant changes to the existing 'look' of the transmission line (e.g., changing from wood poles to steel structure or overhead lines to cables)</li> <li>6. If approved, will result in a change to the line voltage</li> <li>7. The application contains a supplemental request under any of the following sections:               <ul style="list-style-type: none"> <li>• section 78 (electricity rates)</li> <li>• section 98 (entry onto land)</li> <li>• section 101 (construction of work upon, under or over a highway, utility line or ditch)</li> </ul> </li> <li>8. Requires additions / revisions to the standard issues list</li> <li>9. No approved Environmental Assessment stipulating the route that the project must take</li> <li>10. Raises a significant factual, legal or policy issue</li> </ol>	<ol style="list-style-type: none"> <li>1. The project is subject to competition to serve an unserved area</li> <li>2. The project involves natural gas expansion funding (section 36.2)</li> <li>3. One phase of a broader or multi-phase project<sup>2</sup></li> <li>4. The application contains a supplemental request under any of the following sections:               <ul style="list-style-type: none"> <li>• section 36 (natural gas rates)</li> <li>• section 98 (entry onto land)</li> <li>• section 101 (construction of work upon, under or over a highway, utility line or ditch)</li> </ul> </li> <li>5. Raises the adequacy of Indigenous consultation as an issue</li> <li>6. Requires additions / revisions to the standard issues list</li> <li>7. Raises a significant factual, legal or policy issue</li> </ol>

<sup>2</sup> For example, the St. Laurent Project (EB-2019-0006) and the Sudbury Reinforcement Project (EB-2017-0180).

Below are the criteria that will inform whether the Short-form performance standard will apply to a Leave to Construct (LTC) application. Section references in the table are to sections of the *Ontario Energy Board Act, 1998*.

**Criteria for Short-form Application Performance Standard**

<b>Electricity LTC Applications</b>	<b>Natural Gas LTC Applications</b>
<ol style="list-style-type: none"> <li>1. Involves a re-conductoring project that is predominantly on an existing transmission right-of-way</li> <li>2. If approved, will increase the ampacity rating / kcmil of the conductor, but does not change the line voltage (e.g., 155 kV to 230 kV)</li> <li>3. Involves a limited number of new permanent land rights</li> <li>4. There is an approved Environmental Assessment stipulating the route that the project must take</li> <li>5. Does not require additions / revisions to the standard issues list</li> <li>6. Exemption requested under section 95</li> <li>7. Does not raise significant factual, legal or policy issues</li> </ol>	<ol style="list-style-type: none"> <li>1. The application does not contain any supplemental requests under the following sections: <ul style="list-style-type: none"> <li>• section 35 (natural gas rates)</li> <li>• section 98 (entry onto land)</li> <li>• section 101 (construction of work upon, under or over a highway, utility line or ditch)</li> </ul> </li> <li>2. Are not subject to competition to serve an unserved area</li> <li>3. Does not raise the adequacy of Indigenous consultation as an issue</li> <li>4. Does not require additions / revisions to the standard issues list</li> <li>5. Exemption requested under section 95</li> <li>6. Does not raise significant factual, legal or policy issues</li> </ol>



## **Appendix B**

Leave to Construct Performance Standards

## Leave to Construct Complex Electricity & Natural Gas

PROCEDURAL STEP	Calendar Days Elapsed
Application filed	-14
Letter acknowledging receipt of application	-10
Completeness letter issued	0
Notice of application issued	10
Notice published in newspaper	23
Affidavits of Service received	28
Last day for interventions	33
Last day for objections to interventions	43
Procedural Order No. 1 issued	50
Submissions on Issues List	56
Decision on Issues List	63
Interrogatories issued	77
Applicant's responses to interrogatories received	91
Technical Conference	101
Oral Hearing	115
Applicant's written argument-in-chief received	122
OEB staff and intervenor submissions received	136
Applicant's written reply argument received	150
Decision and Order issued	210

## Leave to Construct Short-form Electricity & Natural Gas

PROCEDURAL STEP	Calendar Days Elapsed
Application filed	-14
Letter acknowledging receipt of application	-10
Completeness letter issued	0
Notice of application issued	10
Notice published in newspaper	23
Affidavits of Service received	28
Last day for interventions	33
Last day for objections to interventions	43
Procedural Order No. 1 issued (including Issues List)	49
Interrogatories issued	63
Applicant's responses to interrogatories received	77
OEB staff and intervenor submissions received	91
Applicant's written reply argument received	105
Decision and Order issued	135

## **Appendix C**

Motion to Review Performance Standards

## Motion to Review New Evidence / Facts or Change in Circumstance

PROCEDURAL STEP	Calendar Days Elapsed
Motion to Review filed	0
Letter acknowledging receipt of motion	4
Procedural Order / Notice issued (or determination that the motion will not be heard)	35
Filing of additional materials by applicant	47
Interrogatories issued	61
Responses to interrogatories received	75
OEB staff submission Submissions from parties supporting the motion	85
Submissions opposing the motion	95
Applicant's reply (either written or oral)	105
Decision and Order issued	165

## Motion to Review Error (no discovery)

PROCEDURAL STEP	Calendar Days Elapsed
Motion to Review filed	0
Letter acknowledging receipt of motion	4
Procedural Order / Notice issued (or determination that the motion will not be heard)	35
Filing of additional materials by applicant	45
OEB staff submission Submissions supporting the motion	55
Submissions opposing the motion	65
Applicant's reply (either written or oral)	75
Decision and Order issued	135

## **Appendix D**

Standard Issues Lists for Leave to Construct Applications

## Introduction

The OEB's legislative authority with respect to applications seeking leave to construct electricity transmission lines is set out in sections 92 and 96 of the *Ontario Energy Board Act, 1998* (OEB Act). The OEB also has authority over the form of landowner agreements that have been or will be offered to owners of land associated with the project under section 97 of the OEB Act. The OEB has developed [Filing Requirements For Electricity Transmission Applications](#) (Filing Requirements) to assist applicants when preparing electricity transmission applications filed under section 92.

Section 96 (1) of the OEB Act states that the OEB will grant leave to construct if it is of the opinion that the proposed electricity transmission project is in the public interest. When determining whether the proposed project is in the public interest, section 96 (2) of the OEB Act specifies that the OEB shall only consider the following:

1. The interests of consumers with respect to prices and the reliability and quality of electricity service.
2. Where applicable and in a manner consistent with the policies of the Government of Ontario, the promotion of the use of renewable energy sources.

In hearing an application for leave to construct an electricity transmission line, the OEB will only consider matters that fall within its legislative authority. Accordingly, parties to a proceeding are required to limit their participation to areas that fall within the OEB's legislative mandate. For example, environmental issues, or issues related to the government's duty to consult indigenous people, are not in scope of the OEB's review unless there is a direct impact on price and the reliability and quality of electricity service.

The standard Issues List below has been developed based on the above-referenced sections of the OEB Act and the OEB's Filing Requirements. The OEB recognizes that some cases can raise unique issues, and the OEB's process recognizes that in some circumstances, submissions on the issues list may be needed. The OEB anticipates that the standard Issues List will be sufficient for most electricity transmission infrastructure applications. There may be circumstances where certain of these issues do not apply to an application.



## Section 92 Leave to Construct Issues List

### 1.0: Prices: Need for the Project

- 1.1: Has the applicant demonstrated that the project is needed or would be beneficial in the case of discretionary projects? What factor(s) are driving the need – e.g. new customer demand, increased system capacity requirement, reliability, sustainment, system resilience, etc.?
- 1.2: Is the project consistent with any relevant power system plan (e.g., regional plan)?

### 2.0: Prices: Project Alternatives

- 2.1: Has the applicant demonstrated that the proposed project is the preferred option to address the need, as opposed to implementing a different transmission solution, a distribution solution, a non-wires solution, or some other solution?

### 3.0: Prices: Project Cost

- 3.1: Has the applicant provided sufficient information to demonstrate that the estimates of the project cost are reasonable? Are comparable projects selected by the applicant (as required by the filing requirements) sufficient and appropriate proxies for the proposed project?
- 3.2: Has the applicant adequately identified and described any risks associated with the proposed project? Is the proposed contingency budget appropriate and consistent with these identified risks?
- 3.3: If the applicant has requested that deferral accounts be established, has the applicant adequately demonstrated that the eligibility criteria of Causation, Materiality, and Prudence have been met?

### 4.0: Prices: Customer Impacts

- 4.1: Has the applicant correctly determined the need for and the amount of any capital contributions that are required for the project?
- 4.2: Are the projected transmission rate impacts that will result from the project reasonable given the need(s) it satisfies and the benefit(s) it provides?

### 5.0: Reliability and Quality of Electricity Service

- 5.1: Has the applicant established that the project will maintain or improve reliability?
- 5.2: Has the applicant provided a final System Impact Assessment (SIA)? Does the final SIA conclude that the project will not have a material adverse impact on the reliability of the integrated power system?

- 5.3:** Has the applicant provided a final Customer Impact Assessment (CIA)?  
Does the final CIA conclude that the project will not have an adverse impact on customers, with respect to reliability and quality of electricity service?

**6.0: Promotion of Renewable Energy Sources**

- 6.1:** If the applicant is relying on the OEB's renewable energy objective, has the applicant demonstrated how the project is consistent with the policies of the Government of Ontario?

**7.0: Route Map and Form of Landowner Agreements**

- 7.1:** Are any proposed forms of landowner agreements under section 97 of the OEB Act appropriate and consistent with OEB requirements?
- 7.2:** Does the route map provided pursuant to section 94 of the OEB Act show the general location of the proposed project and the municipalities, highways, railways, utility lines and navigable waters through, under, over, upon or across which the proposed project is to pass.

**8.0: Conditions of Approval**

- 8.1:** The OEB's standard conditions of approval are attached as Schedule 1. If the OEB approves the proposed project, what additional or revised conditions, if any, are appropriate?

**Schedule 1:**  
**Standard Conditions of Approval for Electricity Leave to Construct Applications**

1. [The Applicant] shall fulfill any requirements of the SIA and the CIA, and shall obtain all necessary approvals, permits, licences, certificates, agreements and rights required to construct, operate and maintain the project.
2. Unless otherwise ordered by the OEB, authorization for leave to construct shall terminate 12 months from the date of the Decision and Order, unless construction has commenced prior to that date.
3. [The Applicant] shall advise the OEB of any proposed material change in the project, including but not limited to changes in: the proposed route, construction schedule, necessary environmental assessment approvals, and all other approvals, permits, licences, certificates and rights required to construct the project.
4. [The Applicant] shall submit to the OEB written confirmation of the completion of the project construction. This written confirmation shall be provided within one month of the completion of construction.
5. [The Applicant] shall designate one of their employees as project manager who will be the point of contact for these conditions, and shall provide the employee's name and contact information to the OEB and to all affected landowners, and shall clearly post the project manager's contact information in a prominent place at the construction site.

## Introduction

The OEB's legislative authority with respect to the applications seeking approval for the construction of hydrocarbon pipelines (usually natural gas pipelines) is set out in Sections 90 and 96(1) of the *Ontario Energy Board Act, 1998* (OEB Act).

Section 90(1) states that:

- 90(1)** No person shall construct a hydrocarbon line without first obtaining from the Board an order granting leave to construct the hydrocarbon line if,
- (a) the proposed hydrocarbon line is more than 20 kilometres in length;
  - (b) the proposed hydrocarbon line is projected to cost more than the amount prescribed by the regulations;
  - (c) any part of the proposed hydrocarbon line,
    - (i) uses pipe that has a nominal pipe size of 12 inches or more, and
    - (ii) has an operating pressure of 2,000 kilopascals or more; or
  - (d) criteria prescribed by the regulations are met.

Section 96(1) states that:

- 96(1)** If, after considering an application under section 90, 91 or 92 the Board is of the opinion that the construction, expansion or reinforcement of the proposed work is in the public interest, it shall make an order granting leave to carry out the work.

The OEB also has authority over the form of agreements that have been or will be offered to landowners affected by the pipeline project under section 97 of the OEB Act.

When determining whether a project is in the public interest, the OEB typically examines the need for the project, project alternatives, project cost and economics, environmental impacts, land matters, and Indigenous consultation. This standard issues list is intended to capture all of the issues that are within the scope of a typical hydrocarbon pipeline leave to construct application under section 90 of the OEB Act.

## Section 90 Leave to Construct Issues List

### 1.0: Need for the Project

- 1.1:** Has the applicant demonstrated that the project is needed? What factor/s are driving the need? (e.g. new customer demand, increased system capacity requirement, reliability of service, need for pipeline relocation, operational risks, integrity issues) Has sufficient evidence demonstrating need been provided (e.g. customer or volumetric forecast, system capacity analysis, engineering reports)?
- 1.2:** Has the applicant demonstrated how the project fits within any relevant growth plans for the area and/or the applicant's asset management plans? – e.g. what are the dependencies between the proposed project and previously approved LTC projects or in the case of a large project, between the proposed project and future phases of the project?

### 2.0: Project Alternatives

- 2.1:** Has the applicant demonstrated that the identified need is best addressed by the proposed project, having adequately considered all viable alternatives (e.g. other pipeline solutions or non-pipeline solutions including integrated resource planning alternatives)?
- 2.2:** Has the applicant compared the alternatives using appropriate metrics including cost and cost savings, feasibility (Profitability Index, Net Present Value), timing, reliability, safety, land use requirements, permitting requirements, stakeholder impacts (e.g., municipalities, landowners, Indigenous communities) and environmental impacts?

### 3.0: Project Cost and Economics

- 3.1:** Has the applicant provided sufficient information to demonstrate that the estimates of the project costs are reasonable? How do the costs of the project compare with recent similar projects, where applicable?
- 3.2:** Has the applicant adequately identified and described any risks associated with the proposed project? Is the proposed contingency budget appropriate and consistent with these identified risks?
- 3.3:** Has the applicant demonstrated that the project's economics meet the OEB's economic tests using the methodology outlined in Energy Board Order (EBO) 188 and EBO 134, as applicable? Where a contribution in aid of construction is required, is the amount of the contribution reasonable and consistent with OEB policies?
- 3.4:** If the OEB-approved System Expansion Surcharge (SES) or Temporary Connection Charge (TCS) is requested, has the applicant demonstrated that

project is eligible for a SES or TCS and that the duration of the SES or TCS is appropriate?

- 3.5:** If the OEB-approved Hourly Allocation Factor (HAF) is requested, has the applicant demonstrated that the project is eligible for an HAF? Is the proposed amount of the HAF reasonable and consistent with OEB policies?

#### **4.0: Environmental Impacts**

- 4.1:** Has the applicant filed an Environmental Report which meets the requirements of the OEB's Environmental Guidelines<sup>3</sup> and appropriately identified the environmental impacts associated with construction of the project and adequately described how it intends to mitigate and manage these impacts?

#### **5.0: Route Map and Form of Landowner Agreements**

- 5.1:** Has the applicant demonstrated that any proposed forms of landowner agreements under section 97 of the OEB Act are appropriate?
- 5.2:** Does the route map provided pursuant to section 94 of the OEB Act show the general location of the proposed work and the municipalities, highways, railways, utility lines and navigable waters through, under, over, upon or across which the proposed work is to pass?

#### **6.0: Indigenous Consultation**

- 6.1:** To the extent that the project triggers the Constitutional duty to consult, has the proponent followed the Indigenous consultation requirements from the Environmental Guidelines? Has the duty to consult been discharged sufficiently to allow the OEB to approve the application?

#### **7.0: Conditions of Approval**

- 7.1:** The OEB's standard conditions of approval are attached as Schedule 1. If the OEB approves the proposed project, what additional or revised conditions, if any, are appropriate?

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<sup>3</sup> Ontario Energy Board Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 7<sup>th</sup> Edition, 2016

**Schedule 1:  
Application under Section 90(1) of the OEB Act  
STANDARD CONDITIONS OF APPROVAL**

1. [The Applicant] shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in [insert OEB File No.] and these Conditions of Approval.
2. (a) Authorization for leave to construct shall terminate 12 months after the decision is issued, unless construction has commenced prior to that date.  
(b) [The Applicant] shall give the OEB notice in writing:
  - i. of the commencement of construction, at least 10 days prior to the date construction commences
  - ii. of the planned in-service date, at least 10 days prior to the date the facilities go into service
  - iii. of the date on which construction was completed, no later than 10 days following the completion of construction
  - iv. of the in-service date, no later than 10 days after the facilities go into service
3. [The Applicant] shall obtain all necessary approvals, permits, licences, certificates, agreements and rights required to construct, operate and maintain the Project.
4. [The Applicant] shall implement all the recommendations of the Environmental Report filed in the proceeding, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.
5. [The Applicant] shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, [the Applicant] shall not make any such change without prior notice to and written approval of the OEB. In the event of an emergency, the OEB shall be informed immediately after the fact.
6. Concurrent with the final monitoring report referred to in Condition 7(b), [the Applicant] shall file a Post Construction Financial Report, which shall provide a variance analysis of project cost, schedule and scope compared to the estimates filed in this proceeding, including the extent to which the project contingency was utilized. [The Applicant] shall also file a copy of the Post Construction Financial Report in the proceeding where the actual capital costs of the project are proposed to be included in rate base or any proceeding where [the Applicant] proposes to start collecting revenues associated with the Project, whichever is earlier.

7. Both during and after construction, [the Applicant] shall monitor the impacts of construction, and shall file with the OEB one electronic (searchable PDF) version of each of the following reports:
  - a) A post construction report, within three months of the in-service date, which shall:
    - i. provide a certification, by a senior executive of the company, of [the Applicant's] adherence to Condition 1
    - ii. describe any impacts and outstanding concerns identified during construction
    - iii. describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction
    - iv. include a log of all complaints received by [the Applicant], including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions
    - v. provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licenses, and certificates required to construct, operate, and maintain the proposed project
  - b) A final monitoring report, no later than fifteen months after the in-service date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:
    - i. provide a certification, by a senior executive of the company, of [the Applicant's] adherence to Condition 4
    - ii. describe the condition of any rehabilitated land
    - iii. describe the effectiveness of any actions taken to prevent or mitigate any identified impacts of construction
    - iv. include the results of analyses and monitoring programs and any recommendations arising therefrom
    - v. include a log of all complaints received by [the Applicant], including the date/time the complaint was received; a description of the complaint; any actions taken to address the complaint; and the rationale for taking such actions
8. [The Applicant] shall designate one of their employees as project manager who will be the point of contact for these conditions, and shall provide the employee's name and contact information to the OEB and to all affected landowners, and shall clearly post the project manager's contact information in a prominent place at the construction site.