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August 3, 2017

**VIA ELECTRONIC FILING**

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

**Attention: Ms. Sheri Young, Secretary of the Board**

Dear Ms. Young:

**Re: National Energy Board (the "NEB" or the "Board") File OF-Tolls-Group1-M124-2017-01 01  
Maritimes & Northeast Pipeline Management Ltd. ("M&NP")  
Application for Approval of 2017-2019 Toll Settlement ("Application")  
Responses to NEB Process Letter dated July 11, 2017**

We are counsel to Irving Oil Limited ("Irving Oil") and write in response to the Board's process letter dated July 11, 2017 in respect of the above matter.

Irving Oil has and continues to be a long-term firm transportation service shipper on the Maritimes and Northeast Pipeline system. It has also participated in the Tolls and Tariff Working Group.

Irving Oil fully supports the applied-for negotiated toll settlement for the period 2017-2019. Significant time and effort was taken in the negotiation process and allowed all parties to reach compromises on certain points. The resulting tolls and terms of the Settlement period are just and reasonable and reflect gives and takes made during the process by parties.


With respect to the objections made by Heritage Gas Limited, Irving Oil observes that the concerns raised relate to issues anticipated to arise after 2019. These issues are by no means definitive or absolute and it is unclear how they can or should have bearing on a Settlement applicable to the 2017-2019 time period. In addition, approval of the applied-for Settlement has not been shown to have any prospect of prejudice or preventing such issues from being raised and considered in the future.

Given these circumstances, Irving Oil strongly encourages the Board to proceed and approve the applied-for Settlement without need for further process. Doing so facilitates the objective of toll certainty on the M&NP through to November 30, 2019.

Yours truly,

McCarthy Tétrault LLP

Per:

  
for: Gordon M. Nettleton

cc: Christopher Clinton, Irving Oil Limited

GMN/mpf