

March 5, 2010

Mackenzie Valley Environmental Impact Review Board
200 Scotia Centre
Box 938, 5102 – 50th Avenue
Yellowknife, NT X1A 2N7

RE: Reliance Adjustment

Dear Sirs:

Thank you for the opportunity to further comment on the request by Parks Canada that the MVEIRB require Deze Energy to provide (a) additional routing options and/or transmission line construction options, (b) an evaluation of the potential impacts of the Reliance Adjustment and preferred options identified in (a), and (c) adequate time and opportunity for all parties to review the information provided in (a) and (b) and provide comments on the same.

In so far as it goes, Parks Canada's request is not dissimilar to the recommendations we made to you in Section 6 of the submission on our behalf, made by our legal representative Letha MacLachlan, Q.C. on February 18, 2010. Therefore we support the Parks Canada motion for the following reasons.

- Deze has characterized the Reliance Adjustment as merely a realignment of the route. However, this is an incorrect characterization of what is expected of a proponent when setting out route options and conducting an impact assessment associated with its preferred route. Alignment adjustments are normally site specific and intended as short distance jogs to avoid sensitive areas such as a burial site or a geohazard etc. within the right of way during a detailed route design. Neither of the Adjustments identified in Deze's January 26, 2010 *Supplemental Submission – Adjustments to Transmission Line Route* document are minor in nature and should not be accepted as mere 'realignment'. They are separate routes through the proposed national park.
- Lack of clarity on the proponent's preferred route.
- Lack of sufficient information from the proponent on the nature and significance of potential impacts associated with the proponent's preferred route, including the Reliance Adjustment.
- Lack of proposed mitigations associated with those impacts that would be suitable for the wilderness values of a proposed national park.
- Lack of proponent consultation of stakeholders with interests that would be directly affected by the Reliance Adjustment.

However, we wish to remind the board of our original recommendations, that the project is of such public importance and public concern, and is substantive enough that the project eventually go to a full EIR. If the board chooses to reject the request for ruling in its current form, we ask that the board make a decision to refer the project to EIR.

Thank you for this opportunity.

Yours truly,

W. Finlayson

R. Decorby

S. Decorby