

Osler, Hoskin & Harcourt LLP
Box 50, 1 First Canadian Place
Toronto, Ontario, Canada M5X 1B8
416.362.2111 MAIN
416.862.6666 FACSIMILE

OSLER

Toronto

March 29, 2019

Patrick G. Welsh
Direct Dial: 416.862.5951
PWelsh@osler.com

Montréal

Sent By Electronic Mail and Overnight Courier and Filed Electronically on RESS

Calgary

Ottawa

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor, P.O. Box 2319
Toronto, ON M4P 1E4 (boardsec@ontarioenergyboard.ca)

Vancouver

New York

Dear Ms. Walli:

Re: EPCOR Letter of Comment to Enbridge Response of March 29, 2019

Re EB-2018-0305: Application by Enbridge Gas Inc. for 2019 natural gas rates and other charges effective January 1, 2019

We are in receipt of Enbridge Gas Inc.'s ("Enbridge") letter dated March 29, 2019 responding to our Intervenor Request Letter dated March 27, 2019.

As a first matter, EPCOR Natural Gas Limited Partnership ("EPCOR") acknowledges and appreciates that Enbridge does not oppose EPCOR's request to intervene in the above proceeding.

Second, for clarification, EPCOR's main concern (and primary reason for intervention) relates to the intersection between the Ontario Energy Board's (the "OEB") E.B.O. 188 guidelines and the E.B.O. 134 guidelines, and the potential for Enbridge's proposed revisions to its Economic Feasibility Procedure and Policy to impact – directly or indirectly, advertently or inadvertently – not only the application of E.B.O. 188 but also E.B.O. 134.

In EPCOR's assessment, the Issue as proposed by Enbridge would not accommodate EPCOR's main concern, therefore EPCOR would prefer that the OEB either include the Issue as proposed by EPCOR in our letter of March 27 or include an Issue that otherwise accommodates EPCOR's concern.

Thank you for considering this matter further and for considering EPCOR's Intervenor Request.

Please do not hesitate to contact me if you have any questions.

Yours very truly,



Patrick G. Welsh

c (email only): Richard King, *Osler, Hoskin & Harcourt LLP*
Bruce Brandell/Dana Bissoondatt, *EPCOR*