ENBRIDGE

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**VIA COURIER AND EMAIL**

September 2, 2009

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

**Re: EB-2009-0055 (2008 Deferral and Variance Accounts) and EB-2009-0309 (QRAM Application)**

In its Decision and Order in EB-2009-0055, the Ontario Energy Board (the "OEB", or the "Board") approved the balances in Enbridge Gas Distribution Inc.'s 2008 Deferral and Variance Accounts, and ordered Enbridge to clear those balances in two equal installments during the October 2009 and November 2009 billing cycles. The Board ordered that this clearance will coincide with Enbridge's October 1, 2009 QRAM. For the reasons set out below, Enbridge respectfully requests that the Board's Order be varied to allow and direct Enbridge to clear the balances in its 2008 Deferral and Variance Accounts in 2010.

The Company is in the process of implementing its new Customer Information System ("CIS") in September of 2009. This is a significant undertaking that is the culmination of approximately two years of extensive effort.

Enbridge is pleased to confirm that billing using the new CIS will commence as of mid-September. Naturally, the Company wants to ensure that the switch-over of its customers to the new billing system is as smooth as possible and that adequate time and resources are dedicated to address problems should they arise. To this end, the parties most closely involved with the implementation of the new CIS (which include TMG Consulting, Sapient Canada and Enbridge's own steering committee) have recommended that steps be taken to avoid the potential complications that could arise from additional billing activities during the first several months of operation. Those parties have specifically identified the collection of 2008 deferral and variance account balances as an activity that should be avoided in the early operations of the new CIS and have recommended that this be delayed. Unlike the gas cost adjustment (i.e., QRAM adjustment) which is applied to customer bills on a forward looking basis, clearance of the 2008 deferral and variance accounts relies on historic consumption data and therefore requires additional processes and steps in order to facilitate collection of the amounts from customers.

The recommendation to delay clearance of the 2008 deferral and variance accounts did not arise until an August 31st meeting of the parties involved in the CIS implementation. Since that time, Enbridge has taken prompt action to amend its October 1 QRAM Application and formulate this request.

In these circumstances, Enbridge requests, pursuant to Part VII of the Board's Rules of Practice and Procedure, that the Board review and vary its Decision and Order in EB-2009-0055.

Specifically, Enbridge requests that the Board vary paragraphs 2 and 3 of its Order in EB-2009-0055, so that they read as follows:

> 2) The clearance of the deferral and variance accounts will occur at the earliest opportunity upon stabilization of the new CIS. Currently it is anticipated that collection will coincide with the January 1, 2010 QRAM. The balances will be cleared to customers in two equal monthly installments.
>
> 3) For purposes of clearance, Enbridge shall include in the appropriate QRAM application, similar schedules, as indicated in Appendix "A", reflective of the balances approved in this Decision and Order.

As there is some urgency to this request, we would be grateful if it could be addressed at the Board's early convenience.

Should you have any questions, please contact me.

Yours truly,

Norm Ryckman
Director, Regulatory Affairs
Encl.

cc: Mr. David Stevens, Aird & Berlis LLP
All Interested Parties EB-2008-0219 and EB-2009-0055

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