



500 Consumers Road
North York ON M2J 1P8
P.O. Box 650
Scarborough, ON
M1K 5E3

Kevin Culbert
Manager, Regulatory Accounting
Tel 416-495-5778
Fax 416-495-6072
Email kevin.culbert@enbridge.com

October 19, 2009

VIA COURIER

Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: EB-2009-0162 - Proposed Amendment to RRR Rule for Gas Utilities

This letter contains the comments of Enbridge Gas Distribution Inc. ("EGD") in relation to the OEB's September 21, 2009, Notice of Proposed Amendment to the Natural Gas Reporting and Record Keeping Requirements ("RRR") Rule for Gas Utilities.

EGD has structured its comments in the order of the sections which it believes are affected by the proposed amendments to the RRR Rule.

Section 1.1 (The purpose of reporting and record keeping requirements)

- EGD does not see a significant change or impact from and is not opposed to the proposed wording replacement.

Section 1.6 (Confidentiality of information)

- EGD is not opposed to the proposed amendment to delete the reference to section 2.1.4 and to the deletion and wording replacement within the last paragraph of the section. However, EGD opposes the deletion of the reference to section 2.1.7 as EGD does not believe it is necessary to place a detailed trial balance in addition to utilities audited financial statements already placed on the public record. Providing detailed trial balances to the Board and Board Staff is a reasonable requirement given their level of knowledge and expertise with the OEB's Uniform System of Accounts requirements. However, the provision of audit opinion financial statements should be sufficient for the public record and the publishing of

detailed trial balances would potentially lead to unnecessary misinterpretation and confusion by less knowledgeable readers.

Section 1.8 (Coming into Force)

- EGD is not opposed to the proposed wording amendments subject to any opposing comments EGD has made within the other sections and their eventual amendments.

Section 2.1.2 (Reporting)

- EGD is not opposed to the proposed wording amendments and deletions.

Section 2.1.3 (Reporting)

- EGD is not completely opposed to the proposed amendments but make the following comments
- The information requested in items a), b), c), d) & e) can be provided
- For the above items, EGD questions whether it is appropriate to identify specific marketers for the information being requested or whether the information is better provided in aggregate or through some type of generic numbering assignment for marketers
- With respect to item f), EGD believes greater clarity is required for the definition for the definition of “new” consumer. Does it mean new construction customers in new communities or fuel replacement customers or broker customers who move to system gas for the first time? Additionally, it is an impossible task to obtain new construction or replacement customer data as billing data is co-mingled with move in / move out information for those who are not “new” utility customers

Section 2.1.4 (Reporting)

- EGD is not opposed to the proposed amendment

Section 2.1.14 (Reporting)

- In response to requirement a) - EGD cannot specifically identify gas purchased for sales service customers only, for example, discretionary / peaking supplies are purchased on behalf of all customers for load balancing purposes
- In response to requirement b) – EGD understands this to mean and can only identify the level of “deliveries” associated with direct purchase accounts
- In response to requirements c) & d) - EGD is able to provide the information
- In response to requirement e) - EGD cannot provide quarterly unaccounted for gas as it cannot be determined accurately but will continue to provide annual information

- In response to requirements f) & g) - EGD can only provide estimated allocations of amounts of inventory change for sales service and direct purchase customers
- In relation to requirements a), b), f) & g) - EGD is unsure of what the desired end resulting information is. EGD currently performs an analysis or reconciliation report of volumes for supply and demand
- If requested, an example of the reconciliation can be sent to Board Staff for discussion to determine if it assists in meeting the desired end result of these requirements

Yours truly,

A handwritten signature in black ink, appearing to read "Kevin Culbert". The signature is fluid and cursive, with a large initial "K" and a distinct "C" for "Culbert".

Kevin Culbert
Manager, Regulatory Accounting