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VIA RESS and COURIER

December 14, 2011

Ms Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ms Walli:

**Re: EB-2011-0242 - Enbridge Gas Distribution Inc. ("Enbridge")
EB-2011-0283 – Union Gas Limited
Renewable Natural Gas Program Application
Enbridge Comments on the Proposed Issues List**

On December 5, 2011, the Ontario Energy Board (the "Board") issued Procedural Order No. 1 for the above noted proceeding. Enclosed please find Enbridge's comments on the Board's Draft Issues List for this proceeding.

Please contact the undersigned if you have any questions.

Sincerely,

[Original Signed By]

Lesley Austin
Regulatory Coordinator

cc: Mr. F. Cass, Aird & Berlis LLP (via email)
All Interested Parties EB-2011-0242 (via email)

Enclosure

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B; and in particular section 36(2) thereof;

AND IN THE MATTER OF an application by Enbridge Gas Distribution Inc. for an Order or Orders approving and setting prices for Enbridge Gas Distribution Inc.'s purchase of biomethane;

AND IN THE MATTER OF an application by Union Gas Limited for an Order or Orders approving and setting prices for Union Gas Limited's purchase of biomethane.

**COMMENTS OF
ENBRIDGE GAS DISTRIBUTION INC.
ON THE DRAFT ISSUES LIST**

Procedural Order No. 1 in these proceedings indicates that the applicants and intervenors may file comments on the Draft Issues List attached to the Procedural Order on or before December 14, 2011. Enbridge Gas Distribution Inc. (Enbridge) has reviewed the Draft Issues List and has concerns about proposed Issue 4.6, "Are the proposed gas quality standards to be met reasonable and appropriate?".

The wording of proposed Issue 4.6 puts into question whether "gas quality standards" are reasonable and appropriate. Enbridge respectfully submits that the determination of reasonable and appropriate standards for pipeline-quality gas is not within the scope of these proceedings. Rather, the point for consideration by the Board is whether renewable natural gas will meet the quality standards that apply to gas entering an Ontario distributor's system. Enbridge therefore submits that Issue 4.6 should be re-worded as follows:

Will the proposed supply of RNG meet the applicable quality standards for supplies of gas that enter a gas distributor's system?

In addition to the comments above, Enbridge reserves the right to respond to comments on the Draft Issues List filed by intervenors.

December 14, 2011.