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May 23, 2012

DELIVERED AND FILED VIA RESS

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

Dear Ms Walli:

**Re: EB-2011-0354: Enbridge Gas Distribution application re. 2013 rates
Submissions re. availability and filing of 2011 actual data**

We represent Enbridge Gas Distribution Inc. ("Enbridge" or the "Company").

In Procedural Order No. 2, the Board noted that Enbridge's pre-filed evidence in this case presents forecast information for 2011 operating and financial data, and also noted that the EB-2007-0615 Settlement Agreement requires Enbridge to file 2011 actual information as part of this rebasing case. The Board asked Enbridge to file a submission on the availability of 2011 actual data and whether and how the evidence should address the 2011 actual data.

Enbridge's 2011 actual operating and financial data ("2011 actual data") is now available. The 2011 actual data has been filed as part of Enbridge's 2011 Earnings Sharing Mechanism and Other Deferral And Variance Accounts Clearance Review (EB-2012-0055).

Enbridge intends to file the 2011 actual data in this proceeding as part of an evidence update. Specifically, the Company plans to:

- Update the "Historic Year & Trend Data" evidence for Rate Base, Operating Revenue, Operating Cost, Cost of Capital and Revenue Sufficiency/Deficiency. These items are found as Tab 5 behind Exhibits B through F.
- Update the "Summary" narrative evidence in respect of any of the items listed herein where there is a material difference requiring an update to the 2013 evidence as filed. This update will be presented either as additional narrative evidence at the end of the previously filed "Summary" evidence or, in some cases, on a new exhibit.
- Provide an Impact Statement setting out the impact on the Company's 2013 revenue deficiency resulting from the actual 2011 data, to reflect updates to

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items such as plant balances, rate base, volumes, customer numbers and degree days. The Impact Statement will also set out the impact of other updates to the Company's evidence, such as the Black & Veatch report on storage cost allocation, the MNP report on corporate cost allocations, updated pension funding requirements and updated ROE using current data.

- Update the Cost Allocation and Rate Design evidence (Exhibits G and H) to reflect the Impact Statement.

Enbridge expects to file all of the updated evidence described above, except for the updated Cost Allocation and Rate Design evidence, on or before the date of the Issues Conference (June 4, 2012). Enbridge expects to file the updated Cost Allocation and Rate Design evidence shortly thereafter, but not later than June 8, 2012.

Should you have any questions, please do not hesitate to contact me.

Yours very truly,

AIRD & BERLIS LLP



David Stevens

cc. Enbridge Gas Distribution
All parties registered in EB-2011-0354

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