

UNDERTAKING JT1.27

UNDERTAKING

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To provide the benchmarking studies referred to in Exhibit I, Schedule 1.7, on a confidential basis.

RESPONSE

Undertaking J1.27 asks the Company to provide the benchmarking studies referred to in Ex. I-O3-1.7 on a confidential basis. Enbridge indicated that it will file the reports in confidence at the earliest possible time, after permission from the sponsors of the studies is received. At this time, permission has been granted for Enbridge to file the following studies, on a confidential basis:

- CGA – Standing Committee on Operations Company Profile 2011
- PSE&G – Gas & Electric Utility Peer Panel, Gas Delivery, 2011 Benchmarking Study

The Company is still in the process of obtaining such permissions on a few additional studies as follows:

- AGA – Topic area: Company Profile
- AGA – Topic area: Damage prevention
- AGA – Topic area: External Corrosion
- AGA – Topic area: Leak management
- AGA – Topic area: System reliability
- CGA – Benchmarking Team, Non-Intrusive Pipeline Integrity

The Company requests the Board's permission to file the studies listed above on a confidential basis, as permitted by the Practice Direction on Confidential Filings. The studies are sponsored by third parties, and are not documents belonging to Enbridge. The sponsors of the studies have requested that they not be placed on the public record as they contain information that was provided or collected under expectations of privacy by participants in the benchmarking studies. Additionally, where necessary, the sponsors of the studies have requested that Enbridge redact the names

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of participants (except for Enbridge). Therefore, the studies to be filed confidentially contain such redactions as required. Enbridge notes that substantially the same studies were filed in the Union Gas 2013 rates case under the same conditions of confidentiality, and also notes that Board Staff seems to have accepted that the studies may be filed confidentially in this case. Enbridge proposes to provide copies of the studies filed in response to undertaking J1.27 to any party who executes the Board's form of Declaration and Undertaking.

In reviewing the studies, please use the following key:

For the AGA studies (not yet filed) – EGD is company letter D
For the PSE&G study – EGD is Company #80

In another response to Board Staff Interrogatory #7, filed at Exhibit I, Tab O3, Schedule 1.31, the Company indicated that one of the benchmarking studies dealt with Asset Management practices (the Asset Renewal Study from the CGA). Upon further review, the Company realized that this study is not actually a benchmarking study, but is instead a narrative discussion of different practices by various utilities. The CGA has confirmed its view that the Asset Renewal Study is not a benchmarking study. Accordingly, Enbridge is not including that document with the Benchmarking Studies produced in response to this Undertaking.

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