

Barristers and Solicitors

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## BY COURIER, EMAIL AND RESS

Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street 27<sup>th</sup> Floor, Box 2329 Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: Board File Number: EB-2012-0451, EB-2012-0433, EB-2013-0074 Response of Enbridge Gas Distribution to Motion

Enbridge Gas Distribution Inc. ("Enbridge") is responding to the submissions of Environmental Defence dated July 25, 2013 wherein certain confidential information is sought to be put on to the public record.

Enbridge understands the request now before the Board is solely limited to the following information regarding the cost of:

- a) The connection between the new Parkway West Gate Station to Enbridge's existing system (i.e. the tie-in to the existing NPS 36 Parkway North Pipeline);
- b) Segment A Parkway West Gate Station to Albion Road Station;
- c) Segment B Keele/CNR to Buttonville Station; and
- d) Segment B From Buttonville Station south.

Enbridge provides the specific aggregated cost figures requested below. Station facilities costs are incorporated into the associated pipeline segments.

- a) Parkway West Gate Station and tie in approximately \$28M
- b) Segment A approximately \$356M
- c) Segment B (E-W) approximately \$189M
- d) Segment B (N-S) approximately \$113M

In addition, Enbridge will take the opportunity to respond to a request to permit certain cost evidence from Mr. Paul Chernick in Exhibit L.EGD.GEC.1, page 20 to be put on the public record. Enbridge does not understand or necessarily agree with the derivation of the

information contained in Exhibit L.EGD.GEC.1, page 20 and reserves the right to examine the validity of the information. Enbridge acknowledges that Green Energy Coalition may use the information released today to derive its own conclusions.

Enbridge's concern has always been the impact of the public disclosure of the costing information on the procurement process for the GTA Project. Enbridge continues to feel the pricing it receives may be adversely impacted through public disclosure of the costing information. However, Enbridge has agreed to provide such information on an aggregate basis to respond to the revised request. Enbridge considers its costing process to be a source of competitive advantage relative to other companies. Public disclosure of the detailed cost breakdown could potentially put Enbridge at a disadvantage. For these reasons, Enbridge will oppose any further breakdown of the cost information being placed on the public record.

Enbridge has not undertaken such a significant project and it is not aware of any natural gas project brought before the Board of such magnitude. Enbridge is of the view the prudent course of action is to avoid any actions that may adversely impact its procurement process but feels the limited disclosure provided is sufficiently aggregated to maintain the integrity of the procurement activities and provides the costs in a similar manner to the revised request in the July 25, 2013 submissions.

Yours truly,

AIRD & BERLIS LLP

Scott Stoll

SAS/hm

cc: E. Chin

All parties

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