

August 22, 2013

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON
M4P 1E4

Dear Ms. Walli:

RE: Rates Application by Enbridge Gas Distribution Inc. – EB-2012-0459

I am representing the Consumers Council of Canada in the above-referenced proceeding. I have reviewed the letter submitted by Mr. Shepherd on behalf of the School Energy Coalition (“SEC”) dated July 20, 2013 regarding Enbridge Gas Distribution Inc.’s (“EGD”) Application for rates for the period 2014-2018.

In that letter SEC recommends that the Board designate the question of whether EGD should be allowed to proceed with a cost of service application as a preliminary issue. In addition, SEC suggests that the process allow for interrogatories and that the Applicant be required to lead a witness panel to deal with the issue. EGD has characterized its proposal as a Customized Incentive Regulation (“IR”) plan and is requesting that the Board reject SEC’s request and consider the Application in accordance with its usual process.

The Council, for the reasons articulated by Mr. Shepherd, supports the approach recommended by SEC. Prior to proceeding with EGD’s application, the Board should first determine whether EGD’s proposed multi-year cost of service approach is an acceptable framework for the Board to consider in setting rates for 2014-2018, or in the alternative, whether EGD should be required to file for approval of rates using an IR mechanism.

Yours truly,

Julie E. Girvan

Julie Girvan

Cc: Joan Huzar, CCC
Norm Rykman, EGD
Fred Cass, Aird & Berlis
Interested Parties