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## By electronic filing

September 4, 2013

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

Dear Ms Walli,

Enbridge Gas Distribution Inc. ("EGD") – 2014-2018 Rate Application

Board File No.: EB-2012-0459 Our File No.: 339583-000165

We are writing on behalf of our client, Canadian Manufacturers & Exporters ("CME"), with respect to the two (2) questions which the Board has posed in Procedural Order No. 1 dated August 27, 2013. These questions pertain to the Application by EGD for rates covering the five (5) year period from January 1, 2014, to December 31, 2018.

Subject to the following, we take no position on the two (2) questions which the Board has posed. We agree with the observations made by the Board at pages 3 and 4 of Procedural Order No. 1 to the effect that the rationale and justification for hearing a particular question as a preliminary or threshold issue is the real likelihood that a determination of that matter as a preliminary point will produce material efficiency gains.

The pros and cons of treating the appropriateness of the format and substance of EGD's Application as a preliminary issue have been thoroughly canvassed by others and CME has nothing further to add to those submissions. Regardless of its ultimate format, CME plans to actively participate in EGD's Application for rates covering the period January 1, 2014, to December 31, 2018.

In this connection, we note the Board's letter of August 30, 2013, indicating that it has engaged Dr. Lawrence Kaufmann of Pacific Economics Group Research LLC to provide a written assessment of whether the elements of EGD's proposal are appropriate. Our expectation is that the contents of this report are likely to assist us in analyzing the reasonableness of EGD's requests in whatever format those requests are ultimately presented.

Please contact me if there are any questions pertaining to the contents of this letter.

Yours very truly,

Peter C.P. Thompson, Q.C.

Norm Ryckman (EGD)
Fred Cass (Aird & Berlis)
Intervenors EB-2012-0459

Paul Clipsham

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