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By electronic filing

September 9, 2013

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

Dear Ms Walli,

Enbridge Gas Distribution Inc. (“EGD”)
2013-2014 System Reliability
Board File No.: EB-2012-0459
Our File No.: 339583-000165

As solicitors for Canadian Manufacturers & Exporters (“CME”), we are writing to urge the Board to consider the points raised by Mr. Quinn in his letter dated September 6, 2013, questioning the justification provided by Enbridge Gas Distribution Inc. (“EGD”) in its letter to the Board of August 29, 2013, for the costs of its plan to acquire 170,000 GJ/day of Incremental FT to cover its peak day transportation needs in the period between January and March 2014.

As far as we can determine, EGD has offered little, if any, evidence to justify the exercise of a procurement option which, according to Mr. Quinn, is some \$58M more costly than the least cost alternative.

We urge the Board to refrain from either expressly or impliedly approving EGD’s proposal as prudent. Based on the very limited information which EGD has provided, the issue of the prudence of EGD’s plan requires further scrutiny.

Yours very truly,

A handwritten signature in blue ink, appearing to read 'Peter Thompson', is written over a faint, larger signature that also appears to be 'Peter Thompson'. The signature is written in a cursive style.

Peter C.P. Thompson, Q.C.

PCT\slc

c. Norm Ryckman (EGD)
Fred Cass (Aird & Berlis)
Intervenors EB-2012-0459
Paul Clipsham

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