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## By electronic filing

September 17, 2013

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

Dear Ms. Walli,

Enbridge Gas Distribution Inc. ("EGD") - October 1, 2013 QRAM Application

Board File No.: EB-2013-0295 Our File No.: 339583-000007

I am writing on behalf of Canadian Manufacturers & Exporters ("CME"). Please consider this correspondence as CME's written comments on EGD's QRAM Application, which seeks changes to EGD's rates for the sale, distribution, storage and transmission of natural gas effective October 1, 2013.

As the Board is aware, it is CME's practice to conduct a due diligence review of EGD's QRAM applications. In this Application, we have also reviewed and considered the letter of comment submitted by Federation of Rental-housing Providers of Ontario ("FRPO") on September 16, 2013.

CME welcomes the opportunity to participate in the upcoming consultation meeting so that it can fully understand the issues relating to Unabsorbed Demand Charges ("UDC") and System Reliability raised by FRPO.

Until that meeting occurs, costs relating to these issues should not receive Board approval, or in the alternative, should expressly be approved on an interim basis subject to adjustment after the consultations have been completed.

Other than this single issue, CME finds that the Application is in accordance with the Board-approved QRAM mechanism. As such, other than this comment above, CME does not oppose the relief sought by EGD.

CME requests an award of its reasonably incurred costs in connection with conducting its examination of EGD's QRAM Application.

Yours very truly,

Vincent J. DeRose

c. Norm Ryckman (EGD)Fred Cass (Aird & Berlis LLP)All Interested Parties EB-2011-0354

Paul Clipsham (CME)

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