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March 11, 2013

VIA RESS, EMAIL AND COURIER

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

Dear Ms Walli:

**Re: Enbridge Gas Distribution Inc. GTA application
Ontario Energy Board File Nos. EB-2012-0451
(Combined hearing with Union Gas applications EB-2012-0433 and
EB-2013-0074)
Enbridge Comments on Intervenor Cost Claim Submissions**

Enbridge Gas Distribution Inc. ("Enbridge") has reviewed the cost claims from each of the following interested parties: Association of Power Producers of Ontario ("APPRO"), Building Owners and Managers Association ("BOMA"), Canadian Manufacturers & Exporters ("CME"), Consumers Council of Canada ("CCC"), Council of Canadians ("COC"), Energy Probe, Environmental Defence, Federation of Rental-Housing Providers ("FRPO"), Green Energy Coalition ("GEC"), Industrial Gas Users Association ("IGUA"), London Property Management Association ("LPMA"), Markham Gateway Inc. ("Markham Gateway"), School Energy Coalition ("SEC") and Vulnerable Energy Consumers Coalition ("VECC").

Enbridge has reviewed the claims in comparison to the allowances of prescribed rates within the cost assessment guidelines and finds they are within acceptable tolerances. Enbridge notes however, that there is a wide variation in submitted hours (please see table attached) with respect to claims on the Enbridge portion of the combined application process. Given the variance in hours claimed by Intervenor, Enbridge has provided this analysis to inform the Board of this disparity and believes the Board should take a potential normalizing view of the number of hours claimed into consideration in determining eventual cost awards. Enbridge awaits the Boards cost awards and reserves the right to make submissions regarding any outstanding Intervenor cost submissions which are subsequently received.

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Yours Truly,

(Original Signed)

Kevin Culbert
Senior Manager,
Regulatory Accounting and Budgets

cc: APPrO, BOMA, CCC, CME, Energy Probe, Environmental Defence, FRPO, GEC,
IGUA, LPMA, Markham Gateway Inc., SEC, and VECC (via email only)

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Attachment

Summary of time spent by Intervenor

<u>Intervenor</u>	<u>Hours Claimed (EGD¹)</u>	<u>Hours Claimed (Total²)</u>
VECC	56.8	102.4
LPMA	63.2	154.5
FRPO	151.5	285.0
IGUA	151.6	280.8
CCC	182.5	274.5
Energy Probe	192.3	339.1
SEC	256.6	457.7
CME	259.3	518.5
Markham Gateway	260.4	260.4
BOMA	265.0	708.3
APPrO	288.0	569.4
COC	307.8	615.6
Environmental Defence	656.0	656.0
GEC	991.8	1083.1

¹EB-2012-0451

²EB-2012-0451 and EB-2012-0433 and EB-2013-0074