

VIA E-MAIL

February 23, 2015

Ontario Energy Board
P.O. Box 2319
27th Floor, 2300 Yonge Street
Toronto ON M4P 1E4

Attn: Kirsten Walli, Board Secretary

RE: EB-2014-0276 ENBRIDGE GAS DISTRIBUTION – FRPO Further Comments

We are in receipt of letters from Board Staff, CME and VECC regarding the technical conference scheduled for this Wednesday. Our understanding of the Board's Procedural Order No. 2 was for parties to inform if they desired to still hold the technical conference and to identify the issues of concern for Enbridge's ability to provide the appropriate witnesses. FRPO and CME have done so and Board Staff and VECC have offered an alternative approach of written questions, which in their view would be sufficient.

In our view, another round of questions will not allow an informed understanding of the changes that Enbridge has made to its gas supply planning. As the Board will recall, FRPO struggled with achieving understanding of Enbridge's approach to gas supply planning during the 2013/14 winter. A Technical Conference affords an exchange of communication that can be very helpful in understanding the complex interrelationships of a gas supply plan, the risk management approach and cost mitigation including UDC. In our respectful submission, there is insufficient evidence on the record to support the Enbridge's request for relief of its revised gas supply approach and the potential cost consequences including UDC which is forecasted to be \$166 million.

As we finalize this submission, we are in receipt of Enbridge's letter recommending limiting further inquiry to another round of questions which inhibits our ability to be of assistance to the Board. . That letter does not address our area of inquiry nor how we would address the conceptual complexities of a gas supply plan. We respectfully urge the Board to proceed with the Technical Conference ordered in the original Procedural Order.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. K. Culbert, EGDRegulatoryProceedings – EGD, Interested Parties EB-2014-0276