

VIA RESS, EMAIL and COURIER

October 7, 2015

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

Dear Ms. Walli:

**Re: Ontario Energy Board ("Board") – Notice of Proposal to Amend Specific Codes and the Gas Distribution Access Rule to Implement the Ontario Electricity Support Program – EB-2015-0148
Comments of Enbridge Gas Distribution Inc. ("Enbridge")**

By Notice of Proposal dated September 14, 2016, the Board invited interested parties to comment on proposed amendments to specific codes and the Gas Distribution Access Rule ("GDAR") in order to support the implementation and ongoing operation of the Ontario Electricity Support Program.

Enbridge has reviewed the proposal and provides the following comments regarding Attachment E - Proposed Amendments to the GDAR, and by reference therein, and Attachment A – Proposed Amendments to the Distribution System Code ("DSC").

Under the proposed change to GDAR, the definition of "eligible low-income customer" is to be replaced with the same meaning as in the proposed DSC. The DSC definition states it is "a residential electricity customer" and "approved by a LEAP Intake Agency". For purposes of administering the Low Income Energy Assistance Program – Emergency Financial Assistance ("LEAP EFA") for residential gas customers, and for consistency with the ongoing roles defined for LEAP EFA delivery, Enbridge believes the following modifications are needed:

- The "eligible low income customers" definition needs to include "residential gas customers" and be adjusted / modified to state "approved by a LEAP Lead Agency".
- Additionally a definition of the "Lead Agency" needs to be added. It is the Lead Agency that performs the function of approving customers as "eligible low-

income” under Emergency Financial Assistance and is a social service agency, municipality, or government agency that “partners with a given distributor to approve eligibility for Emergency Financial Assistance”.

Enbridge apologizes for our late submission and respectfully requests the Board consider our comments.

Please contact the undersigned if you have any questions.

Yours truly,

[original signed]

Shari Lynn Spratt
Supervisor, Regulatory Proceedings

cc: Tania Persad, Senior Legal Counsel, Enbridge