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## VIA EMAIL AND COURIER

**FNRRIDGF** 

June 22, 2017

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

Dear Ms. Walli:

**Enbridge Gas Distribution Inc. (EGD) Reply** Re: Franchise Agreement with Town of Collingwood **Board File No. EB-2017-0159** 

In accordance with the Board's Procedural Order No. 1 and Interim Order, EGD provides the following comments in reply to the submissions from Board Staff.

In the event that the Board wishes to use the Gas Main Map (as defined by Board Staff) for any purpose, EGD reiterates its submissions that its Gas Mains Map ought to be afforded confidential treatment by the Board for the reasons expressed by EGD in its request for confidential treatment and supported by Union Gas Limited. In the event that the Board requires EGD to file a form of map suggested by Board Staff, EGD is prepared to file a version of the Collingwood franchise map that shows blocked areas with gas service and colored indicators of relative population density (Density Map). In that case, EGD would also retract the Gas Mains Map from its filing.

EGD has the following reservations about filing the Density Map, however, regarding which EGD seeks Board direction:

- 1) EGD would indicate on the Density Map that it is a static picture at a point in time and is subject to change at any time without notice. Further, it is provided on an as-is basis with no representation or warranty of any kind, express or implied.
- 2) Any person using the Density Map shall do so at its own risk and the Density Map is not intended in any way as a tool to locate underground infrastructure for the purposes of excavation.

3) In areas with low population/customer density, EGD notes it would be possible to discern specific customer identities when coupled with other forms of publicly available information. EGD interprets section 5.3.1 of the Board's Gas Distribution Access Rule as prohibiting EGD from disclosing such information without specific authorization from the Board.

Board Staff also requested an indication of the number of customers in Collingwood to which EGD replies it has approximately 10,400.

Sincerely,

[original signed]

Lorraine Chiasson Regulatory Coordinator

Attachment