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October 20, 2017

VIA RESS AND COURIER

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

Dear Ms. Walli:

**Re: EPCOR Southern Bruce Gas Inc.
South Bruce Expansion CIP Proposals EB-2016-0137 | EB-2016-0138 | EB-2016-0139**

We are in receipt of the letter from Union Gas of October 20, 2017, suggesting that the Union and EPCOR Common Infrastructure Plan (“CIP”) submissions utilized different bases for forecasting volumes. Union raises this single issue as the basis for suggesting that the Board cannot now adequately compare the two CIP submissions. There were, of course, a number of non-common parameters that the two bidders approached in different ways. Those differences are what makes the process competitive. If the Board is of the view that this particular competitive parameter needs resolution, EPCOR could provide consumption numbers for these customers (and reflect those in two of the key metrics – i.e., the cumulative 10-year revenue requirement per unit of volume, and the cumulative 10 year volume). However, this one issue should not be the basis for an expansive IR process on every competitive parameter. As noted at the August 2, 2017 hearing, EPCOR’s view is that no interrogatory process is necessary on the basis the Board has opted for a competitive process (in lieu of a full regulatory one), and at the time the Board had proposed an efficient process to deal with the franchise application.

Sincerely,

[Original signed by]

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