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December 15, 2017

Delivered by Email, RESS & Courier

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2701
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Enbridge Gas Distribution Inc. & Union Gas Limited
MAADs Application (EB-2017-0306)
Rate Application (EB-2017-0307)**

We are writing on behalf of the Association of Power Producers of Ontario (“**APPrO**”) in response to a letter filed by Enbridge Gas Distribution Inc. (“**Enbridge**”) dated November 28, 2017 in respect of the above two matters (the “**Letter**”).

The Letter proposes that the Ontario Energy Board (“**OEB**”) should entertain certain unique procedural steps for its consideration of what are currently two applications:

1. An application filed November 2, 2017 by Enbridge and Union Gas Limited (“**Union**”) for approval to amalgamate and to defer rate rebases by 10 years under OEB File No. EB-2017-0306 (the “**MAADs Application**”); and
2. An Application filed November 23, 2017 by Enbridge and Union for approval of a rate-setting mechanism to be effective during the deferred rebasing period under OEB File No. EB-2017-0307 (the “**Rate Application**”).

APPrO notes that the Letter was filed before notices for either the MAADs Application or the Rate Application were published,¹ that none of the parties that have sought intervenor status in these two applications have had an opportunity to provide submissions on these proposed procedural steps, and that at least one party, the School Energy Coalition (“**SEC**”),² has filed correspondence that disagrees with the Enbridge proposals and instead proposes an alternative procedural approach.

In light of these facts, APPrO submits that the OEB should, as part of Procedural Order No. 1 in the above two proceedings, invite submissions from all interested parties on the procedural

¹ Enbridge did take steps to copy the Letter on intervenors in the EB-2016-0245 and EB-2016-0215 proceedings.

² Letter from counsel to the School Energy Coalition dated December 12, 2017.

proposals made by Enbridge and the alternative proposals made by SEC before making a determination on the procedural steps that it will take.

Sincerely,

BORDEN LADNER GERVAIS LLP

Per:

Original signed by John A.D. Vellone

John A.D. Vellone

CC: Andrew Mandyam, Enbridge
Fred Cass, Aird & Berlis
Mark Kitchen, Union
Jay Shepherd, SEC