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**To:** [Shelly-Anne Connell](#); [Lillian Ing](#)  
**Subject:** FW: Written Comment - EB-2017- 0306 & 0307  
**Date:** Friday, December 29, 2017 1:17:43 PM

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**Subject:** Written Comment - EB-2017- 0306 & 0307

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

Dear Ms. Walli:

Re: Applications EB-2017-0306 & 0307

It should not be a surprise to anyone that after Enbridge Inc. purchased Spectra Energy Corp (\$28Billion US / \$37 Billion CDN), creating North America's largest energy infrastructure company, that there is now an Application to merge Enbridge Gas Distribution Inc. and Union Gas Inc. (EB-2017-0306)  
<https://www.oeb.ca/participate/applications/current-major-applications/eb-2017-0306>  
<https://www.thestar.com/business/2016/09/06/enbridge-in-37-billion-deal-to-buy-spectra-energy-corp.html>  
<http://www.chathamdailynews.ca/2017/03/22/approximately-1000-positions-cut-across-the-chain>

What is surprising and shocking is Application (EB-2017-0307) , Rate Framework for the Delivery of Natural Gas.  
<https://www.oeb.ca/participate/applications/current-major-applications/eb-2017-0307>

Here is an excerpt from the OEB website describing this Application:

Enbridge Gas Distribution Inc. and Union Gas Limited have jointly asked the Ontario Energy Board to approve a new framework that, if approved, would be used to set rates for the delivery of natural gas to customers in every year from 2019 to the end of 2028 [sic].

And this:

In the current application, the gas utilities have proposed a rate setting framework that

would:

- escalate rates annually based on an index driven by inflation without reductions to account for productivity or for a stretch factor
- allow the continued recovery of certain routine, pass through costs such as gas commodity, upstream transportation and cap and trade costs
- allow the recovery of certain non-routine costs provided they are outside of the applicants' control and exceed a threshold of \$1 million

Enbridge Gas Distribution Inc. and Union Gas Limited have also asked for other approvals related to qualifying for incremental capital, adjustments to currently approved revenues and for the continuation of some, and the discontinuation of other deferral and variance accounts.

These two corporations have also submitted Applications (EB-2107-0224 and EB-2017-0255) to Recover the Costs Associated with 2018 Cap and Trade Compliance Plans.

<https://www.oeb.ca/participate/applications/current-major-applications/eb-2017-0224-eb-2017-0255-eb-2017-0275>

So it's all about the Money for the profits of Enbridge.

How will this be achieved?

By cutting jobs, resulting in service reductions, and guaranteed rate increases to cover inflation and protection from unknown ("non-routine") costs and cost recovery for cap and trade compliance plans.

Anything else?

Looks to me like a "licence to print Money."

Apparently these two corporations claim that the amalgamation, if approved, will result in a \$410 Million benefit to customers over ten (10) years.

Well that and \$2.00 will buy you a cheap cup of coffee.

And what happens if this phantom \$410 Million benefit doesn't appear?

And how much more profit will this amalgamated corporation make?

Any honest observer has to be astonished at the hubris exhibited by these companies and their Applications.

[REDACTED] to these Applications;  
EB-2017-0306, EB-2017-0307, EB-2017-0224 and EB-2017-0255. Please sign me up to receive updates using this [REDACTED]