

Ontario Energy Board
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Attention: Registrar

Via Courier and Email: boardsec@oeb.ca

April 3, 2018

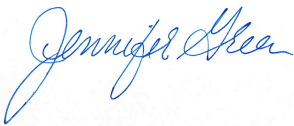
OEB File No.: EB-2017-0319
Enbridge Gas Distribution Inc.
Renewable Natural Gas Enabling Program
Filed: 2018-03-27

The Canadian Biogas Association (CBA) is submitting the following comments on the draft issues list related to Enbridge Gas Distribution's application for approval of cost consequences for the proposed Renewable Natural Gas Enabling Program (**OEB file number EB-2017-0319**).

The CBA supports the list of questions drafted in Procedural Order No. 1, Schedule B and offers an amendment to question 1.1 and two new questions for consideration by the OEB, as follows:

1. Amend 1.1 - Should both parts of the new business activity RNG Enabling Program - the proposed Rate 400 for Upgrading Services and Rate 401 for Injection Services - be considered as part of the utility's regulated business, each on its own merits?
2. Should Rate 401 be mandatory or voluntary (which would enable a third party to provide the Injection Service)?
3. Should Enbridge Gas Distribution/the applicant be required to provide access to the pipeline to producers where requested?
 - a Under what conditions related to pipeline proximity and capacity, for example, should the access be provided, and what measures will EGD take to enable access?

Sincerely,



Jennifer Green, Executive Director
Canadian Biogas Association

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All Parties to EB-2017-0319