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April, 2018

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

**Re: EB-2017-0319, Enbridge Gas Distribution Inc.
RNG Enabling Program / Geothermal Energy Service Program Application
Procedural Order #1: Issues List Comments**

Dear Ms. Walli:

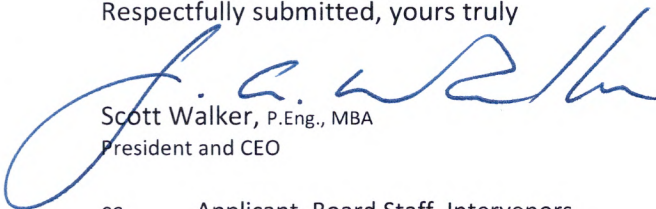
E2 supports the proposed Issues List as set out in Schedule B to Procedural order No. 1, and further supports the addition of those Issues identified by the School Energy Coalition (SEC).

While we believe that it may reasonably be covered by Issues 2.1 and 2.2 which envelop Cost Consequences, we persist in our concern that the Applicant's RNG-access rationale, logic, criteria and cost assessments has not (yet) been provided. Specifically, in the pursuit of RNG-supplies, we believe it important to understand the extent by which the Applicant has considered its potential costs associated with an RNG facility's proximity to existing pipeline infrastructure. A potential RNG project in the outer regions of the Applicants' Eastern Delivery Area (EDA) will have significantly different cost implications than one in its Central Delivery Area (CDA), which is more likely to be immediately contiguous to an existing mainline.

We submit that if the Board believes that this issue can be adequately considered within the precincts of Issues 2.1 and 2.2 then to kindly confirm, or if otherwise, to consider including it as a separate Issue. Similarly, we anticipate its coverage by Issue 1.1, but are specifically concerned by the Applicant's proposed criteria for volume, proximity and other associated conditions for providing RNG-access, as well as the Applicant's potential remedies in the event a project's failure or suspension of government funding.

Thank you for the opportunity to provide commentary on the Issue List and for any consideration of the aforementioned.

Respectfully submitted, yours truly



Scott Walker, P.Eng., MBA
President and CEO

cc. Applicant, Board Staff, Intervenors