

AIRD BERLIS

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BY EMAIL AND COURIER

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ON THE PUBLIC RECORD**

April 20, 2018

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto ON M4P 1E4

Dear Ms Walli:

**Re: EB-2017-0306/EB-2017-0307; MAADs Application by Enbridge Gas
Distribution Inc./Union Gas Limited - Confidentiality request related to
Procedural Order No. 5**

On April 19, 2018, the Applicants, Enbridge Gas Distribution Inc. ("EGD") and Union Gas Limited ("Union"), filed submissions on a motion by the School Energy Coalition in this proceeding. These submissions were filed pursuant to Procedural Order No. 5. The submissions referred to certain third party reports and analysis (the "Reports"). Together with the submissions, the Applicants provided unredacted versions of two of the Reports and a redacted version of the third Report. Specifically, the Applicants filed a redacted version of a document entitled Enbridge/Spectra: Section 96 Trade-off Analysis, dated February 8, 2017, by Charles River Associates (the "February 2017 CRA Analysis").

Pursuant to the OEB's *Practice Direction on Confidential Filings* (Revised October 28, 2016), the Applicants hereby request that the information redacted from the version of the February 2017 CRA Analysis already filed with the Board be treated as confidential information.

The information redacted from the February 2017 CRA Analysis is commercially sensitive and confidential and, in particular, is:

- 1) information about customer storage-related activities that are not public and are not published pursuant to reporting under the Board's *Storage and Transportation Access Rule*; and

2) specific cost information about EGD's unregulated natural gas storage business.

Publication of this confidential information could harm the Applicants and customers of the Applicants by giving other market participants a competitive advantage by having this proprietary business information.

In accordance with the OEB's *Practice Direction on Confidential Filings*, Section 5.1.4, a confidential, unredacted version of the February 2017 CRA Analysis is enclosed with this letter (the "Confidential Document"). The Confidential Document is not to be filed on the public record.

The redacted version of the February 2017 CRA Analysis that has already been filed with the Board can of course be posted on the OEB's webdrawer.

If you have any questions in this regard, please do not hesitate to contact us.

Yours very truly,

AIRD & BERLIS LLP

A handwritten signature in cursive script, appearing to read "Fred D. Cass".

Fred D. Cass

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