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VIA EMAIL and COURIER

June 13, 2018

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

Re: Enbridge Gas Distribution Inc. 2019/2020 Cap and Trade Compliance Plan (“Application”)

Enbridge recognizes that under the Board’s Cap and Trade Framework, a 2019/2020 Compliance Plan is due on or before August 1, 2018. Enbridge respectfully requests that the Board consider extending the deadline to a date which is two months post the issuance of a Decision on its 2018 Cap & Trade Compliance Plan which is currently in the argument phase in EB-2017-0224/0255/0275. An extension of two months is required to adequately consider and develop a two-year Compliance Plan. Enbridge’s request for an extended deadline is necessary because:

- Reply argument in the 2018 Compliance Plan proceeding is not required until June 21. A Decision and Order may not be available prior to the August 1, 2018 deadline for the 2019/2020 Application.
- There may be changes to Ontario’s Cap and Trade and energy conservation markets not known to us in the short-term.
- The deadline for the Provincial governments to announce their intent related to carbon pricing is September 1, 2018. Filing the 2019/2020 Application after this date would benefit from a further important signal around which to plan for 2019/2020.
- It is more likely that the new Ontario government might signal their intentions related to low carbon activities and energy efficiency (as well as Cap & Trade itself) by the later filing date.
- As demonstrated by the Utilities this year, they are capable of continuing to meet their Cap & Trade Compliance obligations without harm to ratepayers despite not having a final Decision and Order from the Board in place in respect of their 2018 Compliance Plans.

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For these reasons, Enbridge seeks the above extension. Enbridge trusts that by making this request at this early stage, it will be of assistance to the Board and Parties.

Please contact the undersigned if you have any questions.

Yours truly,

[original signed]

Andrew Mandyam
Director, Regulatory Affairs, Financial Planning and Analysis

cc: Mr. D. O'Leary, Aird & Berlis LLP
Mr. D. Stevens, Aird & Berlis LLP