

September 13, 2018

**VIA RESS AND COURIER**

Ms. Kirsten Walli  
**ONTARIO ENERGY BOARD**  
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Dear Ms. Walli:

**Re: EB-2017-0319 – Enbridge Gas Distribution Inc. (EGD) Application for Renewal Natural Gas (RNG) Enabling Program and Geothermal Energy Service (GES) Program.**

**Industrial Gas Users Association (IGUA) Comment on EGD Reply Argument.**

We write to draw the Board's attention to an assertion made in EGD's Reply Argument in the captioned proceeding that requires correction.

At paragraph 35 of its Reply Argument EGD states:

*Enbridge's evidence (which is not contradicted by any other parties) is that there are no other parties in the marketplace offering services equivalent to the RNG Enabling Program.*

While perhaps an accurate statement in respect of the proposed RNG Injection Service, and thus, admittedly, not technically incorrect, the statement is misleading insofar as it is intended to apply to the proposed RNG Upgrading Service. IGUA's Final Argument addresses, and contradicts, this precise point at paragraphs 13 (in particular subparagraphs (a), (b), (f), (g) and (h)) and 14, citing EGD's own evidence.

Yours truly,



Ian A. Mondrow

c: A. Mandyam (EGD)  
D. Stevens (Aird & Berlis LLP)  
S. Rahbar (IGUA)  
S. Zhang (Board Staff)  
Intervenors of Record

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