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September 26, 2018

**Delivered by Email**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, Suite 2701  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: EB-2018-0249 Enbridge Gas Distribution Inc. (“Enbridge”)  
GRAM Application  
Association of Power Producers of Ontario (“APPrO”) – Cost Eligibility**

We are counsel to APPrO in respect of the above noted matters.

Pursuant to s. 3.06 of the Board’s Practice Direction on Cost Awards, APPrO intends to seek an award of costs from Enbridge. In accordance with s. 3.03(a) of the Board’s Practice Direction on Cost Awards, APPrO represents the direct interests of consumers in relation to Enbridge’s regulated services.

APPrO has a record of participating in Board proceedings in a responsible and efficient manner and the Board determined that APPrO was eligible for cost awards in other proceedings, including Enbridge prior rates cases; and several natural gas proceedings that had unique impacts on power generators (including, among others, NGEIR and storage allocation proceedings). APPrO believes it is appropriate for the Board to do so again in the context of this proceeding and in light of the potential impacts of the interim disposition of the cap and trade deferral and variance accounts on power generators.

APPrO notes that Enbridge did propose adjustments to its final disposition methodology of these accounts for Rate 125 customers in consideration of APPrO’s submissions.

Sincerely,

**BORDEN LADNER GERVAIS LLP**  
Per:

*Original signed by John A. D. Vellone*

John A. D. Vellone

cc: David Butters, APPrO  
John Wolnik, Elenchus  
Andrew Mandyam, Enbridge Gas Distribution Inc.  
Fred Cass, Aird & Berlis LLP