

November 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.**

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**Industrial Gas Users Association (IGUA) Comment on Draft Accounting Order.**

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As counsel to IGUA we have reviewed EGD's November 8<sup>th</sup> draft rate and accounting orders herein, and write to offer one comment on the draft accounting order.

At page 19 (last paragraph) of the Board's October 18, 2018 *Decision and Order* herein the Board set a condition of approval of Rate 401 that;

*... requires Enbridge to take steps to ensure that ratepayers are not harmed by potential default of [RNG injection] service customers. The impact of such default should be borne by Enbridge's shareholder.*

EGD was directed to provide evidence regarding these steps and their effectiveness when applying to clear the deferral account approved for the RNG injection service.

We suggest that this condition of approval would be more clearly reflected, for future reference, in the orders arising from the decision with the following (highlighted) amendment to the last sentence of the draft accounting order:

*In order to ensure that ratepayers are not harmed by potential default of Rate 401 customer default, [t]he annual revenue sufficiency/deficiency calculation will not include any impacts of contract default by RNG injection service customers.*

Absent a clearer articulation at this time of how any impacts of contract default are to be addressed in the deferral account calculations (for example, imputation of revenue under the contract subject to default or exclusion of costs related to the service to the defaulting customer), the express

recitation of the Board's condition of approval will ensure that any future reviewers of deferral account calculations will be alert to the manner in which any impacts of a customer default are accounted for.

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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