



November 20, 2018

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

RE: Report of the Ontario Energy Board: Framework for the Assessment of Distributor Gas Supply Plans (EB-2017-0129)

Enbridge Gas Distribution Inc. ("EGD") and Union Gas Limited ("Union") are in receipt of the Ontario Energy Board's ("the Board") *Report of the Ontario Energy Board: Framework for the Assessment of Distributor Gas Supply Plans* ("the Framework") dated October 25, 2018. While EGD and Union (together "the gas utilities") are eager to comply, the gas utilities write to inform the Board that the timelines provided within the Framework and its covering letter will not allow for the development and delivery of 5 year gas supply plans which meet the requirements of the Framework. Reasons are outlined below.

Under the Framework the Board requires numerous analyses and materials as part of the 5 year gas supply plans which are net new to the plans currently produced by the gas utilities. By way of example, none of the scenario analyses, performance metrics, risk analyses, 5 year forecast and 3 year historical reviews have been required in past filings or proceedings. These items and others require adequate time to consider, develop and document prior to submission. EGD and Union are concerned that a requirement to produce 5 year gas supply plans for January 2019 does not allow sufficient time to prepare a complete filing that meets the Framework as outlined and ultimately will not be of assistance to the Board in its stated objective of assessing whether distributor's gas supply plans provide the best value to customers.

The gas utilities note that the timelines specified within the Framework call for two 2019 submissions; a 5 year plan in January and an annual update in May. In EGD and Union's assessment it is unlikely that any update to the gas utilities' gas supply plans would be required between the months of January and May, implying significant duplication between these two processes in 2019. As such, EGD and Union intend to file 5 year gas supply plans in May of 2019 in order to allow for the development and delivery of plans which are inclusive of all the

requirements set forth in the Framework. This filing date will allow the utilities to prepare more complete filings and align with the Board's stated timeline for 2019 submissions in a manner than maximizes regulatory efficiency for all parties. Following this initial filing of 5 year gas supply plans EGD and Union will file annual updates in May of each of the following 4 years.

Given the gas utilities' previously stated constraint that 5 year gas supply plans could be prepared no sooner than Q2 of 2020^{1,2} and the constraints described above, EGD and Union respectfully request that the Board confirm the approach proposed above by the utilities.

Sincerely,

[original signed by]

Brandon Ott
Technical Manager, Regulatory Applications
Enbridge Gas Distribution Inc.
416-495-6350
brandon.ott@enbridge.com

[original signed by]

Karen Hockin
Specialist, Regulatory Initiatives
Union Gas Limited
519-436-5473
khockin@uniongas.com

cc: Mark Kitchen

¹ EB-2017-0129, Comments of Enbridge Gas Distribution regarding a Draft Report of the Board: Framework for the Assessment of Distributor Gas Supply Plans, June 1, 2018, p.10

² EB-2017-0129, Comments of Union Gas Limited regarding a Draft Report of the Board: Framework for the Assessment of Distributor Gas Supply Plans, June 1, 2018, p.9