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October 11, 2006

**DELIVERED VIA EMAIL**  
**boardsec@oeb.gov.on.ca**

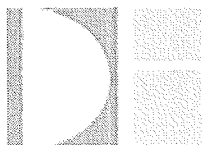
Ms. Kirsten Walli  
Board Secretary  
**Ontario Energy Board**  
26th Floor  
2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli:

**Re: Intervention of Accenture Business Services for Utilities Inc.  
("ABSU", formerly CustomerWorks Inc.) and Enbridge Gas  
Distribution Inc. ("EGD") Fiscal 2007 Rates  
Board File EB-2006-0034**

We act on behalf of ABSU in connection with the above proceeding. This letter is submitted on its behalf pursuant to Rule 23 of the *Rules of Practice and Procedure of the Ontario Energy Board*.

1. ABSU hereby applies for late permission to participate in this proceeding;
2. ABSU is part of Accenture which is a global management, consulting and business process outsourcing organization. ABSU provides full-service customer management solutions for more than 6 million end use customers of a number of Canadian and North American utilities, municipalities and retail energy companies. Accenture has contracts with clients located in Alberta, Ontario, British Columbia, New Brunswick, as well as a number of states in the United States. This full service meter to cash operation includes customer contact, billing, meter reading services, credit and collections, and payment processing.
3. Prior to August 2002, CustomerWorks Limited Partnership ("CWLP") provided customer care services ("Services") to EGD pursuant to a client services agreement dated January 1, 2002 (the "Agreement");
4. On August 1, 2002 the provision of Services pursuant to the Agreement was subcontracted to 3985806 Canada Inc., which is now ABSU;



5. Neither ABSU nor any other Accenture entity is affiliated with or related to any party named in these proceedings. They are independent third parties;
6. Accenture operates in a highly competitive environment with regard to customer care outsourcing in the North American marketplace. All aspects of Accenture's business including deal and pricing structures contain highly confidential and competitive information. Accenture will suffer serious, irreparable commercial harm if this information is made public;
7. ABSU seeks to intervene in this proceeding for the purposes of protecting the confidentiality of its business affairs. Specifically, ABSU seeks to ensure that its business interests are not prejudiced by reason of the disclosure of ABSU or Accenture's confidential business affairs; and
8. ABSU requests that all material with respect to this matter be forwarded to:

Ms. Janet M. Clark  
Vice-President and General Counsel  
Accenture Business Services for Utilities  
123 Commerce Valley Drive East  
8th Floor  
Thornhill, Ontario  
L3T 7W8

If there are any concerns regarding ABSU's participation, please contact me.

Sincerely,

**DAVIES HOWE PARTNERS**

Robert J. Howe

RJH:shs

c: Ms. Lorraine Chiasson  
All Intervenors