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Our File # 339583-0000007

By electronic filing

December 17, 2018

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> floor  
Toronto, ON M4P 1E4

Dear Ms. Walli

**Re: Enbridge Gas Distribution Inc. ("EGD")  
January 1, 2019 QRAM Application  
Board File #: EB-2018-0313**

We are writing on behalf of Canadian Manufacturers & Exporters ("CME"). Please consider this correspondence as CME's written comments on EGD's QRAM Application, which seeks changes to EGD's rates for the sale, distribution, storage and transmission of natural gas effective January 1, 2019.

As the Board is aware, it is CME's practice to conduct a due diligence review of EGD's QRAM Applications. CME wishes to better understand the changes to rates effective January 1, 2019.

CME invites EGD to answer the following:

- 1) Please confirm that the effective date of the carbon charge on fossil fuels imposed on distributors, importers and producers is delayed until April 1, 2019, and therefore will not be reflected in rates as of January 1, 2019;
- 2) Please provide a bill comparison inclusive of Rider C (gas cost adjustment rider). Please use the bill comparison tables from Tab 4, Schedule 6, pages 1-8 and show:
  - a. the change in Rider C; and
  - b. the combined bill impacts of the change in Rider C and EGD's rates.

- 3) Confirm if there will be any other drivers that will increase or decrease rates, effective January 1, 2019. If there are other drivers, please indicate directionally whether they will increase or decrease rates.

CME requests an award of its reasonably incurred costs in connection with conducting its examination of EGD's QRAM Application.

Yours very truly

Borden Ladner Gervais LLP



Scott Pollock

- c. Andrew Mandyam (EGD)  
Fred Cass (Aird & Berlis LLP)  
All Interested Parties EB-2016-0215  
Alex Greco (CME)

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