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March 1, 2019

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

Ottawa

Vancouver

New York

Dear Ms. Walli:

EB-2018-0331: Applications for the disposition of Cap and Trade-related Deferral and Variance Accounts for the period 2016-2018

Re: Letter of Comment of EPCOR Natural Gas Limited Partnership

In Procedural Order No. 3 dated February 12, 2019, the Ontario Energy Board (the “OEB”) invited parties to the above proceeding to file a written submission on (i) the legal effect of the repeal of the *Climate Change Act*; and (ii) specifically, the treatment of strictly confidential auction and market sensitive information in this proceeding resulting from the repeal of the *Climate Change Act*.

EPCOR Natural Gas Limited Partnership (“ENGLP”) takes no position on the issues above, but offers the following comments:

1. It is ENGLP’s expectation that any decision by the OEB – whether to make the materials treated as confidential available to the public or not - would apply equally to all distributors; and
2. It is possible that revealing market-sensitive and auction-confidential material would reveal compliance strategies that may be relevant under the output-based pricing system component of the federal *Greenhouse Gas Pollution Pricing Act* or other market-based carbon pricing systems in the future, which the OEB should bear in mind in its considerations.

Please do not hesitate to contact me if you have any questions.

Yours very truly,



Patrick G. Welsh

c (email only): Susannah Robinson, *EPCOR Natural Gas Limited Partnership*
Richard King, *Osler, Hoskin & Harcourt LLP*
Applicants & List of Intervenors in EB-2018-0331