



Rakesh Torul
Technical Manager
Regulatory Applications

tel 416 495 5499
egiregulatoryproceedings@enbridge.com

Enbridge Gas Inc.
500 Consumers Road
North York, Ontario M2J 1P8
Canada

March 29, 2019

BY EMAIL, COURIER & RESS

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

Dear Ms. Walli:

**Re: EB-2018-0305 Enbridge Gas Inc. – 2019 Rate Application
Response to EPCOR Late Intervenor Request**

This is in response to the Intervenor Request Letter of EPCOR Natural Gas Limited Partnership (“EPCOR”) dated March 27, 2019.

Enbridge Gas Inc. (“Enbridge Gas” or “the Company”) does not oppose EPCOR’s request to intervene in the above noted proceeding.

With respect to EPCOR’s request to add a new issue, Enbridge Gas notes in its pre-filed evidence at Exhibit B1, Tab 1, Schedule 1, Appendix H, the Company updated the Economic Feasibility Procedure and Policy in the Enbridge Gas Distribution (“EGD”) rate zone as follows:

- The Policy has been expanded to include key elements of the Community Expansion framework as approved by the Board in EB-2016-0004 dated November 17, 2016
- The Policy has been updated with a refined approach to determine the Profitability Index (PI) for each infill customer

The Procedure and Policy were updated to better align with Ontario Energy Board’s E.B.O. 188 guidelines. The information on the refined feasibility analysis approach for residential infill customers is presented in response to a commitment made in the EB-2018-0131 EGD Earnings Sharing proceeding.

Should the Board determine an issue on this topic should be added to the issues list, the Company proposes the wording from Board Staff in its submission on the draft issues list be used:

Is Enbridge Gas’ customer connection policy of calculating the Profitability Index for every individual infill customer for the Enbridge Gas Distribution rate zone and requiring a contribution in aid of construction (CIAC) appropriate and in accordance with the OEB’s E.B.O. 188 guidelines?

March 29, 2019
Ms. Kirsten Walli
Page 2

The Company would also like to note that the 2019 rates application concerns adjustments pursuant to a rate setting mechanism where the 2018 approved base rates are adjusted in accordance with the MAADs decision and Order in EB-2017-0306/0307.

Please contact the undersigned if you have any questions.

Yours truly,

(Original Signed)

Rakesh Torul
Technical Manager
Regulatory Applications

cc: EB-2018-0305 Intervenors
Bruce Brandell/Dana Bissoondatt, EPCOR
Patrick G. Welsh, Osler, Hoskin & Harcourt LLP
Crawford Smith, Lax O'Sullivan Lisus Gottlieb