



450 – 1 Street SW  
Calgary, Alberta T2P 5H1

Tel: (403) 920-7165  
Fax: (403) 920-2347  
Email: jim\_bartlett@transcanada.com

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Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

**Attention: Ms. Kirsten Walli, Secretary of the Board**

Dear Ms. Walli:

**Re: Enbridge Gas Inc. (EGI)  
OEB File No. EB-2019-0137  
TransCanada PipeLines Limited (TCPL) Response to June 27, 2019 EGI Letter**

On June 25, 2019, TransCanada PipeLines Limited (TCPL) submitted a letter of comment on Enbridge Gas Inc.'s (EGI) 5 Year Gas Supply Plan (Gas Supply Plan) of May 1, 2019 (EB-2019-0137). EGI replied June 27, 2019. TCPL offers the following response in which it reiterates its request for the Ontario Energy Board (Board or OEB) to consider the two procedural enhancements noted by TCPL in its initial letter for the assessment of the Gas Supply Plan:

- 1) that the written questions submitted by stakeholders receive written responses from EGI prior to the Stakeholder Conference, and
- 2) that stakeholders have an opportunity to file their own comments or evidence, informed by the written responses above, also prior to the Stakeholder Conference.

It is entirely appropriate that written questions submitted by stakeholders be responded to by EGI in similar written format, especially since such questions may be of a technical or quantitative nature. The second enhancement is related to the timing of submissions to provide an opportunity for stakeholders to file their own analysis earlier in the process. These adjustments would greatly improve the discussions at the Stakeholder Conference as they would contribute to the establishment of a full and complete regulatory record to assist the Board in its deliberations and help ensure that Ontario consumers receive the most beneficial outcome possible.

TCPL has supported<sup>1</sup> and continues to support the objectives of the *Framework for the Assessment of Distributor Gas Supply Plans* (Framework), which is to put in place a process that provides for greater consistency, transparency, accountability and performance measurement in the assessment of distributor gas supply plans.<sup>2</sup> TCPL's request is fully consistent with the spirit

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<sup>1</sup> EB-2017-0129 TransCanada PipeLines Limited Letter of Comment, June 1, 2018.

<sup>2</sup> EB-2017-0129 OEB Cover Letter to the Report of the Ontario Energy Board: Framework for the Assessment of Distributor Gas Supply Plans, October 25, 2018, page 1.

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and intent of these guiding principles, and notes the Board's expectation that the Framework could be refined over time as needed.<sup>3</sup>

TCPL does not agree with EGI's statements that it is not "...necessary or appropriate to now change the process steps set out in the Framework" or that "Adding process steps such as those suggested by TCPL... will complicate and add to the process that the Board set out in the Framework."<sup>4</sup> The procedural steps proposed would enhance and clarify the information available for all parties to fully assess the Gas Supply Plan, and would ensure greater transparency, accountability and stakeholder engagement throughout the review process.

TCPL appreciates the Board's consideration in these matters, and respectfully requests that the Board consider and incorporate the enhancements to the assessment process outlined herein.

Yours truly,

**TransCanada PipeLines Limited**

*Original signed by*

Jim Bartlett

Manager, Regulatory Research and Analysis

Canadian Natural Gas Pipelines

cc: Brandon Ott, Enbridge Gas Inc.  
David Stevens, Aird & Berlis LLP  
EB-2018-0305 Intervenors

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<sup>3</sup> *Ibid*, page 2.

<sup>4</sup> EB-2019-0137, EGI Letter of Comment, June 27, 2019, page 2.