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May 11, 2020

Sent by Electronic Mail and RESS Electronic Filing

Ms. Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
27-2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Long:

Re: EB-2019-0183: Enbridge Gas Owen Sound Reinforcement Project Leave to Construct & Rate M17 Application - Draft Rate Order Submission

This correspondence is in response to Enbridge Gas' Draft Rate Order Submission dated May 1, 2020.

In its Decision and Order dated April 9, 2020 ("Decision"), the Board requested that Enbridge Gas respond to two items within its Draft Rate Order submission as it relates to Rate M17 and the provision of that service to ENGLP. One of those two items was for Enbridge Gas to confirm whether the remaining 82% of Project Costs has a "use or benefit to ENGLP."

As a result of the Decision, ENGLP is required to pay Enbridge Gas a \$5.34 million contribution in aid of construction, on the basis that this amount represents 18% of the Project capacity that will provide gas transmission service to ENGLP. The remaining 82% of costs represents the portion of the Project that is not allocated to serve ENGLP. In its response of May 1, 2020 Enbridge Gas appears to be continuing to argue its position rather than provide the information as requested by the Board. Enbridge Gas has failed to articulate any use or benefit to ENGLP associated with the remaining 82% of the Project Costs because there are none. Accordingly, no additional portion of those remaining costs should be allocated to ENGLP through a future rebasing application. Enbridge Gas' proposed approach would result in ENGLP inappropriately making ongoing project contributions in excess of the approved 18% and subsidizing the costs incurred to serve other Enbridge Gas customers.

In order to ensure clarity on this point, we respectfully request that the Board confirm that EPCOR will not be responsible for the remaining 82% of Project Costs.

We trust the enclosed is satisfactory. Should you have any questions, please do not hesitate to contact the writer.

Sincerely,

[Original Signed By]

Bruce Brandell
Director
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(780) 412-3720

cc: All parties via email