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VIA EMAIL and RESS

August 26, 2020

Ms. Christine E. Long
Board Secretary
Ontario Energy Board
P.O. Box 2319,
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EB-2020-0160 Enbridge Gas Inc. (Enbridge Gas)
Windsor Pipeline Replacement Project ("Project") – Section 101 Application
Enbridge Gas's reply to FRPO's Motion**

Enbridge Gas is writing in response to a notice of motion made by the Federation of Rental-housing Providers of Ontario (FRPO) dated August 24, 2020, requesting that the Ontario Energy Board (the "Board") order Enbridge Gas to provide full and adequate responses to Interrogatories I.FRPO.1 to I.FRPO.6.

Enbridge Gas is of the view that these interrogatories are not within the scope of this proceeding. Enbridge Gas is also concerned about the time to bring such motion as it was filed on the same day that submissions were due in the motion from Environmental Defence. Both motions were in respect of interrogatory responses filed the same day and there has been no explanation for the delay in bringing the motion by FRPO. It has been clear in the record that Enbridge Gas is seeking an expeditious consideration of the issues.

Interrogatories I.FRPO.1 to I.FRPO.6 pertain to customer demand, local system capacity which were relevant to the sizing of the Windsor Replacement Pipeline which was appropriately the subject of the Leave to Construct proceeding EB-2019-0172. That decision is not the subject matter of this proceeding. Interrogatories I.FRPO.1 to I.FRPO.6 have no relevance to the depth of the pipeline nor the abandonment of the NPS 10 pipeline.

If there are any questions, please contact the undersigned.

Yours truly,

Rakesh Torul
Technical Manager, Regulatory Applications

cc: Scott Stoll, Aird and Berlis LLP
EB-2020-0160 Intervenors