

SCOTT POLLOCK
T 613.787.3541
spollock@blg.com

Borden Ladner Gervais LLP
World Exchange Plaza
100 Queen St, Suite 1300
Ottawa, ON, Canada K1P 1J9
T 613.237.5160
F 613.230.8842
blg.com



Our File # 339583-000007

By electronic filing

September 16, 2020

Christine Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

Dear Ms. Long

**Re: Enbridge Gas Inc. (“EGI”)
October 1, 2020 QRAM Application
Board File #: EB-2020-0195**

We are writing on behalf of Canadian Manufacturers & Exporters (“CME”). Please consider this correspondence as CME’s written comments on EGI’s QRAM Application, which seeks changes to EGI’s rates for the sale, distribution, storage and transmission of natural gas effective October 1, 2020.

As the Board is aware, it is CME’s practice to conduct a due diligence review of EGI’s QRAM Applications. CME wishes to better understand the changes to rates effective October 1, 2020.

CME invites EGI to answer the following:

- 1) Is it EGI’s normal practice to prepare a “preliminary QRAM estimate” (Exhibit A, Tab 2, Schedule 2, pg. 3 of 10) using an earlier 21-day strip prior to the preparation of the actual QRAM using the usual 21-day strip? Alternatively, did EGI prepare a preliminary QRAM estimate specifically in order to use it as an alternative if the normal QRAM estimate caused bill increases of greater than 25%?
- 2) Please explain why a 21-day strip ending August 3, 2020 was chosen as the preliminary QRAM estimate strip.
- 3) In order to calculate the Alberta Border Reference Price and the Dawn Reference Price, EGI uses the 21-day average of the twelve-month NYMEX strip. The strip is then

converted to the applicable reference price by taking into account the particular basis differential and the foreign exchange rate for the October 2020-September 2021 period.

Please advise whether EGI altered the reference date for calculating the basis differential or the foreign exchange as a result of the change in the end date of the applicable NYMEX strip.

CME requests an award of its reasonably incurred costs in connection with conducting its examination of EGI's QRAM Application.

Yours very truly



Scott Pollock

- c. Brandon Ott – *by email at EGIRegulatoryProceedings@enbridge.com*
- Tania Persad – *by email at Tania.Persad@enbridge.com*
- All Interested Parties EB-2018-0305 & EB-2019-0194 – *by email*
- Alex Greco (CME) – *by email*

116169703:v1