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**Enbridge Gas Inc.**  
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Canada

**VIA RESS and EMAIL**

November 23, 2020

Christine Long  
Registrar, Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto, Ontario  
M4P 1E4

Dear Ms. Long,

**Re: EB-2020-0181 – Enbridge Gas Inc. (“Enbridge Gas”)  
2021 Rates (Phase 2 – Incremental Capital Module Requests)**

Enbridge Gas has reviewed the intervention requests filed for its 2021 Rates (Incremental Capital Module) proceeding (EB-2020-0181).

Enbridge Gas objects to the proposed intervention from the City of Toronto, on the basis that the City of Toronto does not have a “substantial interest” in the subject matter of this proceeding. As described in Enbridge Gas’s Application and prefiled evidence, this proceeding relates to requests for ICM funding for three capital projects. None of these projects are in or around the City of Toronto (they are in Ottawa, London and Sarnia area). As such, the City of Toronto is not specifically impacted by this proceeding, except to the extent that it is a ratepayer of Enbridge Gas. This is different from the ongoing EB-2020-0136 Cherry to Bathurst LTC Application, where the City of Toronto is an intervenor with a direct interest in proposed facilities that are located in Toronto.

Enbridge Gas acknowledges that the City of Toronto was an approved intervenor in “Phase 1” of the 2021 Rates Application (EB-2020-0095). However, Enbridge Gas notes that the City of Toronto did not “participate actively” in that proceeding by filing interrogatories or participating in the Settlement Conference.

Enbridge Gas does not have any comment in response to the intervention requests from the other parties who have requested intervenor status parties. For the most part, these parties represent specific ratepayer groups.

Should you have any questions on this matter please contact the undersigned.

Sincerely,

Rakesh Torul  
Technical Manager  
Regulatory Applications

cc: Nicholas Rolfe, City of Toronto Legal Services  
David Stevens, Aird & Berlis LLP