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December 07, 2020

BY RESS, AND EMAIL

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

Dear Ms. Long:

Re: Enbridge Gas Inc. Ontario Energy Board File No.: EB-2019-0159 2021 Dawn Parkway Expansion Project – Cost Claims Reply Submission

Pursuant to the Ontario Energy Board's ("OEB" or the "Board") Procedural Order No. 8 (dated November 18, 2020) dealing with Final Cost Awards and Application Withdrawal in Enbridge Gas Inc.'s ("Enbridge Gas") 2021 Dawn Parkway Expansion Project proceeding, Enbridge Gas is in receipt of cost claim submissions from:

- Federation of Rental-housing Providers of Ontario ("FRPO");
- Green Energy Coalition ("GEC"); and
- Pollution Probe ("PP").

The Submission of FRPO

Enbridge Gas does not support the conclusions drawn by FRPO regarding the feasibility of its proposed market-based alternative to serve firm contractual Dawn Parkway System demands effective November 1, 2021.

In its submission, FRPO claims that it was forced to engage in time-consuming research of market information to support the development of its evidence because, "EGI has no appetite to share its market information with an intervenor such as FRPO." FRPO's March 13, 2020 letter to the Board stating its intention to file evidence in this proceeding placed no such pre-conditions upon its evidence. In fact, Mr. Quinn has presented himself in this proceeding as an expert who has similarly assisted the Board in past proceedings. The Board should not accept FRPO's suggestion that Enbridge Gas in any way contributed to and therefore bears responsibility for its costs.

FRPO compares its costs solely to those of PP. Enbridge Gas submits that it is more appropriate to compare FRPO's claim to the maximum interim cost threshold established by the Board in its Procedural Order No. 3 (dated April 2, 2020) of \$30,000. FRPO has claimed costs nearly double the amount of that threshold and nearly \$25,000

more than the amount submitted by GEC, which also intended to file expert evidence in this proceeding.

The Submissions of GEC and PP

Regarding the submissions of GEC and PP, Enbridge Gas reiterates its submission regarding cost claims made on June 16, 2020,

As no expert evidence has been provided to Enbridge Gas at this time, it is not possible to comment on its relevance in light of the Board's expectations set out in Procedural Order No. 3 (dated April 2, 2020), "...that intervenors filing evidence will ensure that the evidence is within the scope of the approved Issues List, and will coordinate their efforts to avoid duplication."

Enbridge Gas is concerned that despite claiming costs in excess of the threshold established by the Board for interim cost awards, GEC and PP still have not produced any expert evidence to support their cost claims in this proceeding.

Sincerely,

Adam Stiers Technical Manager, Regulatory Applications

c.c.: C. Keizer (Torys) Z. Crnojacki (OEB Staff) M. Millar (OEB Counsel) EB-2019-0159 (Intervenors)