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BY EMAIL AND FILED VIA RESS

Christine Long
Registrar
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: Enbridge Gas Inc. ("Enbridge Gas")
EB-2020-0181 – 2021 Rates Application – Phase 2**

We act as counsel to Enbridge Gas in this matter.

In this application, Enbridge Gas is seeking OEB approval for unit rates associated with three 2021 Incremental Capital Module (ICM) requests.

One of the ICM requests relates to Phase 3 of the St. Laurent NPS 12 Replacement Project in the EGD Rate Zone (St. Laurent Phase 3 Project). At the time that Enbridge Gas filed its application, the Company had not yet filed a Leave to Construct (LTC) application for the St. Laurent Project (comprised of the St. Laurent Phase 3 Project and the St. Laurent Phase 4 Project). In the course of preparing its LTC application, the Company sought and received updated contractor pricing for the Project which reflects, among other things, the contractor's experience with Phase 2 of the Project. Based upon the new information received, Enbridge Gas has determined that the estimated costs for the St. Laurent Phase 3 Project as stated in the prefiled evidence in support of the ICM request are understated. Based on updated information, Enbridge Gas now forecasts that the 2021 in-service capital associated with the St. Laurent Phase 3 Project will be substantially higher than the \$13.1 million amount included in the ICM request.

Enbridge Gas expects to file the LTC application for the St. Laurent Project by February 16, 2021.

Procedural Order No. 1 in this 2021 Rates Application (Phase 2) directs Enbridge Gas to file its Argument in Chief on or before February 1, 2021.

In light of the circumstances described above, Enbridge Gas respectfully requests that it be permitted to update its prefiled ICM evidence relevant to the St. Laurent Phase 3 Project, to reflect the updated cost forecast and any other relevant information from the LTC application. That will ensure that there is alignment between the forecast Project costs as set out in the LTC application and the ICM funding request in this proceeding. Enbridge Gas also respectfully requests that the Board extend the deadlines set out in Procedural Order No. 1.

The Company's specific requests and proposal are as follows:

- Enbridge Gas requests that it be permitted to file updated ICM evidence relevant to the change in forecast costs of the St. Laurent Phase 3 Project by February 22, 2021.
- If the Board believes that further discovery on the updated evidence is required, Enbridge Gas proposes to provide responses within 5 days after supplementary interrogatories are received.
- Enbridge Gas proposes to file its Argument in Chief within 3 days of the later of: (i) the filing of updated evidence; or (ii) the filing of supplementary interrogatory responses.
- OEB Staff and intervenor written submissions could be filed 17 days after the Enbridge Gas Argument in Chief (the same relative timing as set out in Procedural Order No. 1).
- Enbridge Gas could file its Reply Argument 16 days after the OEB Staff and intervenor submissions (the same relative timing as set out in Procedural Order No. 1).

Please let us know if you have any questions.

Yours truly,

AIRD & BERLIS LLP



David Stevens
DS/

cc: All parties registered in EB-2020-0181