



Richard Wathy
Technical Manager
Regulatory Applications
Regulatory Affairs

Cell: 519-365-5376
Email: Richard.Wathy@enbridge.com
EGIRegulatoryProceedings@enbridge.com

Enbridge Gas Inc.
P.O. Box 2001
50 Keil Drive N.
Chatham, Ontario, N7M 5M1
Canada

July 28, 2021

VIA RESS AND EMAIL

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

Dear Christine Long:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File No.: EB-2021-0149
2020 Utility Earnings/Disposition of Deferral Variance Account Balances
Reply Submission on Confidentiality Request**

In accordance with Procedural Order #1 in response to OEB Staff and intervenors, Enbridge Gas puts forth the following submission regarding the request for confidentiality.

Enbridge Gas notes that only three parties made submissions about the Company's request for confidential treatment of certain documents. OEB Staff and Canadian Manufacturers & Exporters (CME) have both filed submissions voicing no concerns with the confidential treatment of the documents. The Federation of Rental-housing Providers of Ontario (FRPO) requests that Enbridge Gas provide further details about the request.

The following is in response to the FRPO submission requesting specific rationale regarding the request for confidentiality.

The information for which Enbridge Gas requests confidential treatment is found at Exhibit D, Tab 1, Schedule 6. As described at Exhibit D, Tab 1, Schedule 1, page 3 (EGD Rate Zone Storage and Transportation Deferral Account), the confidential information relates to RFP responses received for market-priced storage services.

The RFP responses were received by Enbridge Gas on August 22, 2019 with conforming offers from 5 different counterparties with multiple terms, prices and injection/withdrawal parameters. Bids received and those that were selected are outlined in Confidential Exhibit D, Tab 1, Schedule 6.

Enbridge Gas has provided the same information as part of the settlement process in recent Deferral Account clearance applications. In each instance, this information has

been provided on a confidential basis, under the OEB's Practice Direction on Confidential Filings. In each case, all parties have agreed to confidential treatment, and in each case the OEB has accepted that the information should be treated as confidential.

As part of the settlement proposal in EB-2020-0134 (the 2019 Deferral Account clearance application), Enbridge Gas provided rationale for its confidentiality request made pursuant to the OEB's Practice Direction on Confidential Filings, and stated:

Given Enbridge Gas's concern that the confidential and commercially sensitive information set out in the documents might, if made public, compromise Enbridge Gas's commercial position in respect of future storage procurements and related negotiations which would not be in the best interests of either Enbridge Gas or its ratepayers, the parties to the Settlement Proposal have agreed that it would be appropriate for redacted versions of the subject documents to be filed on the public record.¹

The OEB Decision on the confidentiality of the Request for Proposal (RFP) process for market-based storage capacity stated:

The OEB approves the confidentiality request as it finds the unredacted evidence in Appendix B to the settlement proposal to be commercially sensitive with respect to future storage procurements and related negotiations.²

In this proceeding Enbridge Gas is requesting that equivalent information with regards to the procurement of market-based storage, as decided upon in prior years, be treated as confidential under the OEB's Practice on Direction on Confidential Filings.

All parties that have executed the OEB's Declaration and Undertaking, to date, have been granted access to the unredacted documents.

If you have any questions, please contact the undersigned.

Sincerely,

Richard Wathy
Technical Manager, Regulatory Applications

c.c.: Intervenors (EB-2021-0149)

¹ EB-2020-0134, Exhibit N1, Tab 1, Schedule 1, Cover Letter, page 2.

² EB-2020-0134 OEB Decision on Settlement Proposal dated January 25, 2021, page 9.