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Our File # 339583-0000007

## By electronic filing

March 16, 2022

Nancy Marconi Registrar Ontario Energy Board 2300 Yonge Street, 27<sup>th</sup> floor Toronto, ON M4P 1E4

Dear Ms. Marconi

## Re: Enbridge Gas Inc. ("EGI") April 1, 2022 QRAM Application Board File #: EB-2022-0089

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 its rates for the sale, distribution, storage and transmission of natural gas effective April 1, 2022.

As the Board is aware, it is CME's practice to conduct a due diligence review of EGI's QRAM Applications. CME has also had the benefit of reviewing the additional questions submitted by the Federation of Rental-Housing Providers of Ontario.

CME shares the concerns outlined by other intervenors in previously proceedings that EGI's continued use of smoothing mechanisms is straining the connection between the market price of natural gas and the commodity cost determined through the QRAM process and paid by ratepayers. However, CME understands the unique circumstances causing the significant volatility in natural gas market prices as well as the salutary impacts of EGI's rate proposal. Accordingly, CME takes no issue with EGI's application in this matter.

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

Yours very truly

A Pul

Scott Pollock



c. Richard Wathy (EGI) Tania Persad (EGI) All Interested Parties EB-2019-0194; EB-2021-0147; EB-2021-0148 Mathew Wilson & Allison Bernholtz (CME)