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Canada

November 8, 2022

VIA EMAIL and RESS

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

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File: EB-2022-0203
Ridge Landfill RNG Project
Submission on Confidential Treatment of Customer Contract Information**

Pursuant to the OEB's Procedural Order No.1 dated October 31, 2022, please find below Enbridge Gas's submission on the confidential treatment of certain information within the contract between Enbridge Gas and Ridge (Chatham) Holdings L.P. ("Ridge Holding").

On August 29, 2022, Enbridge Gas filed its application and evidence for the Ridge Landfill RNG Project seeking an order granting leave to construct a pipeline in Blenheim, in the municipality of Chatham Kent. The proposed pipeline will connect Waste Connections of Canada Inc.'s planned renewable natural gas (RNG) facility at Ridge Landfill to Enbridge Gas's distribution system and will be used to transport the RNG that is produced at the facility. Ridge Holding has entered into an M13 Union South Transportation of Locally Produced Gas agreement (the "Contract") with Enbridge Gas. As part of the application, Enbridge Gas requested confidential treatment of certain information within the contract and specifically energy usage, load profile and billing information.

Enbridge Gas redacted the following information from the Contract:

- Within Schedule 1 (Contract Parameters): Customer Maximum Daily Quantity at the Ridge Landfill Receipt Point
- Within Schedule 2 (Service Terms and Rates): Customer Firm Daily Variability Demand and Customer balancing service parameters

Enbridge Gas generally considers this type of customer information to be commercially sensitive consistent with the OEB's Practice Direction on Confidential Filings that treat the information as presumptively confidential. Additionally, the OEB has consistently treated this type of customer contract information as confidential.

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Previous examples of the OEB treating similar information as confidential include the 2022 Greenstone Pipeline Project¹, the 2021 Sarnia Industrial Line Reinforcement Project², the Sudbury Expansion Project³, and the 2015 Sarnia Expansion Project⁴.

Furthermore, section 5.3 of the OEB's Gas Distribution Access Rule prohibits the disclosure of specific customer information to a third party without written consent of the customer or specific authorization of the OEB.

Following the filing of its application and Pollution Probe's initial objection to treating the Contract information as confidential, Enbridge Gas has confirmed with Ridge Holding that it has no objection to filing the information on the public record. Accordingly, Enbridge Gas is withdrawing its request to treat the Contract information as confidential.

Nevertheless, it is Enbridge Gas's view that generally and in future proceedings this type of customer information should continue to be considered presumptively confidential as it typically is commercially sensitive, and disclosure of the information has the potential to harm the competitive position of the customer.

Enclosed is a copy of an unredacted version of the Contract (Exhibit E, Tab 1, Schedule 1, Attachment 1).

Please contact the undersigned if you have any questions.

Yours truly,

Brittany Zimmer
Sr. Advisor, Regulatory Applications – Leave to Construct

c.c. Guri Pannu (Enbridge Gas Counsel)
EB-2022-0203 Intervenors of record

¹ EB-2021-0205, Decision on Confidentiality, November 26, 2021.

² EB-2019-0218, Application and Evidence, October 7, 2019, Exhibit B, Tab 1, Schedule 2, Attachment 1.

³ EB-2015-0120, Updated response to Board Staff 5, July 8, 2015.

⁴ EB-2014-0333, Application and Evidence, November 4, 2014, Schedule 3-1 and Schedule 3-2.