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December 14, 2022

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

Dear Ms. Marconi

Re: Enbridge Gas Inc. (“EGI”)
January 1, 2023 QRAM Application
Board File #: EB-2022-0286

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 January 1, 2023.

As the Board is aware, it is CME’s practice to conduct a due diligence review of EGI’s QRAM Applications. In its application, EGI stated that it had reviewed shortening the 24 month disposition period of the April 2022 and July 2022 QRAMs however, determined that it would not be appropriate, as: “shortening of the 24-month period of the PGVA riders from the April and July 2022 QRAMs would cause bill increases for some customers resulting in a disconnect between market prices and bill impacts.”

CME submits that EGI should provide additional evidence on what shortened PGVA periods it considered and the relative bill impacts of those recovery periods, and a further explanation of why a bill increase would necessarily be inappropriate. Given the total amounts to be collected through the PGVA riders, leveraging the reduction in commodity costs to shorten the disposition period could still be reasonable and appropriate. This is especially true when the result of shortening the disposition period would ‘undo’ some of the disconnect between market prices and bill impacts that occurred as a result of EGI’s mitigation efforts in earlier QRAMs.

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

Yours very truly

A handwritten signature in blue ink, appearing to read "Scott Pollock".

Scott Pollock

c. Vincent Caron (CME)

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