

SCOTT POLLOCK
T 613.787.3541
spollock@blg.com

Borden Ladner Gervais LLP
World Exchange Plaza
100 Queen St, Suite 1300
Ottawa, ON, Canada K1P 1J9
T 613.237.5160
F 613.230.8842
blg.com



Our File # 339583.000007

By electronic filing

March 15, 2023

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

Dear Ms. Marconi

**Re: Enbridge Gas Inc. (“EGI”)
April 1, 2023 QRAM Application
Board File #: EB-2023-0073**

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, 2023.

As the Board is aware, it is CME’s practice to conduct a due diligence review of EGI’s QRAM Applications. CME takes no issue with EGI calculations and use of the Board’s approved QRAM methodology.

However, in its application, EGI proposes to advance the recovery of the July 2022 QRAM mitigation as part of the April 1, 2023, QRAM application. Specifically, EGI proposes to advance recovery of the final three months of the 24-month PGVA disposition included in the July 2022 QRAM mitigation plan. EGI ruled out other potential advancement periods.

CME echoes the comments it submitted for EGI’s January 1, 2023, QRAM application – namely that the parties and the Board would likely benefit from additional evidence. Specifically, CME requests that EGI submit evidence regarding the potential impacts of different advancement scenarios that demonstrate why the other advancement scenarios are impractical, unreasonable, or worse than EGI’s proposed approach.

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)

133640279:v1