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April 6, 2023

VIA RESS AND EMAIL

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

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas, or the Company)
EB-2022-0200 – 2024 Rebasing – Phase 1 Technical Conference Undertaking
Responses**

Enbridge Gas filed its 2024 Rates Application and the majority of its supporting evidence on October 31, 2022 and the balance of its evidence on November 30, 2022. In this Application, Enbridge Gas requests approval of rates for the sale, distribution, transmission, and storage of gas commencing January 1, 2024. Enbridge Gas also applies for approval of an incentive rate-making mechanism (IRM) for the years from 2025 to 2028.

In Procedural Order No. 1, the OEB made a provision for a Technical Conference with a due date for Enbridge Gas's undertaking responses of April 6, 2023. This timing was confirmed by the OEB's letter dated March 22, 2023.

In accordance with Procedural Order No. 1, enclosed please find Enbridge Gas's undertaking responses. Enbridge Gas will post the responses on its website at www.enbridgegas.com/about-enbridge-gas/regulatory. Enbridge Gas will send a copy of this letter, and a link to the website page, to all parties to the proceeding.

Enbridge Gas notes the responses to Exhibit JT1.25 and Exhibit JT7.23 are not included in the package and will be provided at a later date. Exhibit JT1.25 requests unit costs be completed for the tables in Exhibit I.1.10-ED-44. Exhibit JT7.23 requests similar analogous presentations to what was provided in response to Exhibit I.5.3-IGUA-29 for the period 2012 to 2020.

In accordance with the OEB's revised [Practice Direction on Confidential Filings](#) effective December 17, 2021 (Practice Direction), Enbridge Gas is requesting confidential treatment of portions of undertaking responses and/or attachments to the undertaking responses. The requests fall into two categories.

A) Responses including redactions of irrelevant information.

B) Responses including redactions of confidential information.

Attachments A and B to this letter set out details of the requests being made in each category.

As required by the Practice Direction, Enbridge Gas has filed confidential un-redacted versions of each of the applicable documents, identifying all portions of the document for which confidential treatment (or non-relevance) is claimed, as well as non-confidential redacted versions of each such document.

Enbridge Gas notes that in accordance with the Practice Direction, representatives of parties who sign the OEB's Declaration and Undertaking will be provided with unredacted versions of the confidential (but not the irrelevant) documents.

Finally, during the Technical Conference, Enbridge Gas noted a limited number of interrogatory responses that would need to be corrected. In responding to the undertaking requests, Enbridge Gas discovered a small number of further corrections. The Company expects to file the updated interrogatory responses with the OEB and parties by April 11, 2023.

Should you have any questions, please let us know.

Sincerely,

Vanessa Innis
Manager, Strategic Applications – Rate Rebasing

Attachment A – Irrelevant Information

	Exhibit	Description of Undertaking and Document	Irrelevant Information Location	Brief Description	Basis for (Ir)relevance Claim
1.	JT5.10	To file the enterprise standard document, subject to confidentiality concerns	Attachment 1, pages ii, iii, v, vi, ix, 17, 30-34, 109-112, 114, 115, 117, 134-145, 148-180, 182, 216 Attachment 2, page 5	Redacted information related to other Enbridge Inc. business units and not related to Enbridge Gas	Only part of the produced report in Attachment 1 relates to Enbridge Gas. The balance of the report relates to other business units that are not the subject of this Application and that are not subject to OEB oversight. Similarly, while the report in Attachment 2 is primarily about Enbridge Gas, it contains a discrete piece of information related to another business unit that is not the subject of this Application and that is not subject to OEB oversight. Note that the redacted items are also confidential in that they disclose commercially sensitive and/or proprietary information about other Enbridge Inc. business units that, if publicly released, could adversely impact their competitive position.
2.	JT5.15	To confirm whether the 2018 assessment(s) are available, and if so to provide them	Attachment 1, pages 2, 4-28	Redacted information related to other Enbridge Inc. business units and not related to Enbridge Gas	Only part of the produced report relates to Enbridge Gas. The balance of the report relates to other business units that are not the subject of this Application and that are not subject to OEB oversight.

Attachment B – Confidentiality Requests

	Exhibit	Description of Undertaking and Document	Confidential Information Location	Brief Description	Basis for Confidentiality Claim
1.	JT5.10	To file the enterprise standard document, subject to confidentiality concerns	<p>Attachment 1, pages 19, 23-26, 41-52, 54-108, 111, 113-117, 119-134, 146-148, 182-193, 195-216</p> <p>Attachment 2, pages 3-12, 15-19</p>	<p>The redacted information in Attachment 1 sets out the detailed methodologies and code used by Enbridge (across multiple business units) in the design and calculations of value models</p> <p>The redacted information in Attachment 1 sets out the basis on which the scaling factors used in the Enbridge risk matrix are developed.</p> <p>Attachment 2 includes value data which, if released, could provide competitors to Enbridge Inc. insights which might provide to them a commercial advantage</p>	<p>Enbridge has invested heavily to develop an industry leading approach for the application of its value framework which aims to support and improve Enbridge's relative competitiveness in its various business units (BUs). In Attachment 1, the redacted information includes not just the detailed calculations that underpin the Enbridge value framework but also proprietary code that was developed to derive values in Copperleaf. In Attachment 2, the redacted information includes the specific values, formulas and workbook that are used in developing and implementing the Enbridge risk matrix.</p> <p>Sharing this information could prejudice the commercial position of the BUs who leverage the value framework and risk matrix and operate in a competitive environment; and could produce significant financial loss where other operators leverage the information to improve cost effectiveness and outcompete Enbridge in opportunities to provide services to existing and new customers or to bid on contracts and services.</p> <p>This information fits with item a) in the OEB's Considerations in Determining Requests for Confidentiality ("the potential harm that could result from the disclosure of the information,</p>

	Exhibit	Description of Undertaking and Document	Confidential Information Location	Brief Description	Basis for Confidentiality Claim
				when bidding on contracts and services.	including: i. prejudice to any person's competitive position; ... iii. whether the information could interfere significantly with negotiations being carried out by a party; and ... (b) whether the information consists of a trade secret or financial, commercial, scientific, or technical material that is consistently treated in a confidential manner by the person providing it to the OEB.") ¹
2.	JT7.21	To break down the capital associated with Lakeside performing services from the line that we see here, and break it down into the two respective legacy organizations, including the number of units performed and the cost per unit for those meter changes. To provides a fairly simple metric to say what is the cost per unit, over time, for both Enbridge and Union	page 2	Total units and unit pricing for 2019 to 2022	Any form of unit pricing would reveal commercially sensitive information of Lakeside and it would be prejudicial to Lakeside in any competitive bidding process or negotiation for other parties to know the unit rates charged by Lakeside. Such disclosure may also be disadvantageous to Enbridge Gas for any future competitive bidding process that Enbridge Gas undertakes for services that Lakeside provides. Lakeside also provides services to third parties, other than Enbridge Gas. This is information that the OEB has indicated will be presumptively considered to be confidential – Billing rates and/or unit pricing of a third party. ²

¹ This is noted as items (a) and (b) in the "Considerations in Determining Requests for Confidentiality", as found at Appendix A to the OEB's Practice Direction on Confidential Filings

² Ibid.