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June 21, 2023

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

Dear Ms. Marconi

**Re: Enbridge Gas Inc. (“EGI”)
2024 Rebasing – Capital Update
Board File #: EB-2022-0200**

We are writing on behalf of Canadian Manufacturers & Exporters (“CME”). As the Board is aware, EGI filed a ‘capital update’ on June 16, 2023, after the conclusion of both the discovery process and the settlement conference (the “**Capital Update**”).

The Capital Update included significant changes to EGI’s evidence, including the 2023 and 2024 capital budgets, adjustments to specific capital projects, changes to EGI’s proposed depreciation rates, and other changes.¹

On June 20, 2023, in response to a question from Environmental Defence, EGI indicated that it was not planning on updating other evidence on record, such as interrogatories and undertakings to reflect the revisions made in the Capital Update.

CME has had the benefit of reviewing the correspondence from other intervenors on this issue. It shares the concerns raised in those letters. The Board’s procedure provides for a discovery process for a reason. It is intended to ensure that a complete and accurate record is placed before the Panel. In the absence of such a record, both parties and the Panel are at a disadvantage. EGI has indicated that its witnesses will be prepared to answer questions on the updated information at the hearing.²

¹ EB-2022-0200, EGI Capital Update Letter, June 16, 2023.

² EB-2022-0200, E-mail from David Stevens, June 20, 2023.

However, CME submits that exploration of the capital update evidence at the hearing will lead to an inefficient use of hearing time and will not provide a full and complete record for the Board.

Accordingly, CME supports the requests made by others, and submits that the Board should order EGI to update the evidentiary record, including the interrogatory and technical conference undertaking responses to accord with information provided in the Capital Update as soon as possible.

Yours very truly

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

Scott Pollock

c. Vincent Caron (CME)

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