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June 28, 2023

**VIA RESS AND EMAIL**

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

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas, or the Company)  
EB-2022-0200 – 2024 Rebasing – ADR 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. 5, the OEB scheduled a settlement conference from May 29 to June 7, 2023, which subsequently continued to June 9, 2023. Attached are responses to supplementary requests for information that were made during the Settlement Conference process. All parties agreed that it is appropriate for these items to be included on the public record for this proceeding.

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 the attachment to Exhibit I.ADR.17 within the category of responses including redactions of confidential information.

Attachment A to this letter sets out details of the request.

As required by the Practice Direction, Enbridge Gas has filed a confidential un-redacted version of the applicable document, identifying all portions of the document for which confidential treatment (or non-relevance) is claimed, as well as a non-confidential redacted version of 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 the unredacted version of the confidential document with the exception of the City of Kitchener. It is Enbridge Gas's understanding that the City of Kitchener has contracted with the same Alliance Partners for construction services and therefore having access

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to the confidential information found in the report (including detailed pricing structure and unit rates) could impact future procurement negotiations with construction contractors.

Enbridge Gas will post this evidence on its website at <https://www.enbridgegas.com/about-enbridge-gas/regulatory> and will send a copy of this letter and a link to the website page to all parties in this proceeding.

Should you have any questions, please let us know.

Sincerely,

Vanessa Innis  
Manager, Strategic Applications – Rate Rebasing

### Attachment A – Confidential Requests

	Exhibit	Description of Document	Confidential Information Location	Brief Description	Basis for Confidentiality Claim
1.	I.ADR.17	Benchmarking Study of an independent review of its Alliance Partner contracts and associated spend and to identify applicable industry best practices and recommendations for potential improvements	Attachment 1, pages 3-4, 6-7, 9, 11-30, 32-34, 36-47, 50, 52-53	The redacted information relates to highly commercially sensitive information regarding the Alliance Partnership contracts (including terms and details related to pricing structure, revenue and profit margins) and proprietary and confidential information related to Wood Mackenzie (including its proprietary analysis/findings and sensitive contractual terms). Sharing this information could prejudice the commercial position of the Company, the Alliance Partners, and/or Wood Mackenzie, and could produce significant financial loss where other industry competitors leverage	<p>This fits within items a) and b) in the OEB's Considerations in Determining Requests for Confidentiality. "(a) the potential harm that could result from the disclosure of the information, 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 iv. whether the disclosure would be likely to produce a significant loss or gain to any person; (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".</p> <p>The information also fits within items 1 and 2 (unit pricing and billing rates of a third party) of the categories of information that the OEB has indicated will be presumptively deemed confidential.</p> <p>Note that Enbridge Gas is sharing the unredacted document with parties to the settlement process that have filed a signed Confidentiality Declaration and Undertaking, we request that the City of Kitchener be provided a redacted version notwithstanding its previous filing of a signed Declaration and Undertaking. This is due to Enbridge Gas's understanding that the City of Kitchener is subject to a particularly salient</p>

	Exhibit	Description of Document	Confidential Information Location	Brief Description	Basis for Confidentiality Claim
				the information to gain an undue advantage in negotiations or the provision of services.	conflict of interest compared to the other parties, in that it has contracted with the same Alliance Partners for construction services and could therefore use the confidential information found in the report (including detailed pricing structure and unit rates) to its advantage in future procurement negotiations with construction contractors.