



By EMAIL and RESS

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June 13, 2024
Our File: HV 2024-0011

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Attn: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: EB-2024-0111 – Enbridge Rebasing Phase 2

We are counsel for the Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI). We have reviewed the evidence of the Applicant, filed yesterday, relating to Enbridge Sustain. This letter is sent pursuant to Procedural Order #2 to request a brief extension for HRAI interrogatories.

The Enbridge Sustain evidence is, unfortunately, somewhat sparse, necessitating a careful review of the HRAI interrogatories to make sure the record is complete. Interrogatories are due on June 19th, but the key point person and subject matter expert at HRAI, Martin Luymes, is out of the country, returning on June 18th. A meeting of the HRAI Utility Action Committee is scheduled immediately thereafter, on Thursday June 20th.

HRAI therefore requests a short extension to file its interrogatories, from Wednesday June 19th to Monday, June 24th. We do not believe this will impact the remaining schedule for the proceeding.

HRAI also notes the Applicant's comments in their letter of June 12th with respect to the proposed evidence of HRAI. The focus of our evidence will, as we described, be the types and amounts of costs that will arise in carrying out the Enbridge Sustain business. That is necessary for the Commissioners to assess the cost allocation information and forecasts from the Applicant, and identify any ratepayer subsidies. Information relating to the market, and how it works, is intended to be context only, since the Enbridge



Sustain business is not similar to the utility business that is more familiar to the OEB. Without understanding how that business must work within the realities of the competitive markets, it is difficult to determine where to look for costs that should be reallocated from the utility to the unregulated business. This was, in fact, the approach when dealing with the ancillary businesses in the 1990s, and we believe the OEB found it very helpful.

We are confident that, when the Commissioners see the HRAI evidence, they will be satisfied that it keeps its focus on the approved issue relating to Enbridge Sustain.

All of which is respectfully submitted.

Yours very truly,
Shepherd Rubenstein Professional Corporation

A handwritten signature in black ink, appearing to read "Jay Shepherd", written over a light grey rectangular background.

Jay Shepherd

cc: Martin Luymes and Sandy MacLeod, HRAI (by email)
Interested Parties (by email)