



Direct Dial: (416) 216-2311
Direct Fax: (416) 216-3930
rking@ogilvyrenault.com

SENT BY FACSIMILE

Toronto, October 23, 2008

Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2700
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli:

**RE: Enbridge Gas Distribution Inc.
Application for 2009 Rates - EB-2008-0219
APPrO Letter of Intervention**

We are legal counsel to the Association of Power Producers of Ontario ("APPrO"). We are writing on behalf of APPrO to request intervenor status in the application of Enbridge Gas Distribution Inc. for the approval or fixing of rates for the distribution, transmission and storage of natural gas beginning January 1, 2009 (EB-2008-0219).

APPrO is a non-profit organization representing more than 100 companies involved in the generation of electricity in Ontario, including generators and suppliers of services, equipment and consulting services. APPrO members, who currently produce over 95% of electricity made in Ontario, produce power from gas, cogeneration, hydroelectric, coal, nuclear, wind energy, waste wood and other facilities.

A significant portion of Ontario's new electricity supply will come from gas-fired generation and there are a number of existing gas-fired generators operating in Ontario at present. As a result, many of APPrO's members have a direct interest in the outcome of this proceeding. APPrO will be in a position to ensure that the interests of all of its gas-fired generator members are brought forward.

**Barristers & Solicitors,
Patent Agents & Trade-mark Agents**

Suite 3800
Royal Bank Plaza, South Tower
200 Bay Street
P.O. Box 84
Toronto, Ontario M5J 2Z4
Canada

Telephone (416) 216-4000
Fax (416) 216-3930

ogilvyrenault.com

DOCSTOR: 1559645\1

Toronto • Montréal • Ottawa • Québec • London

APPrO takes no position on whether the proceeding is conducted by way of oral or written hearing. Similarly, APPrO has no comments on the advisability of the Board proceeding with Enbridge's proposed two-phased approach to the review of its application.

For the purposes of this intervention, APPrO intends to seek a determination by the Board at the conclusion of this proceeding that APPrO is eligible for a cost award. APPrO represents the direct interests of gas-fired generators who are ratepayers in relation to the regulated services provided by Enbridge. APPrO has a record of participating in Board proceedings in a responsible and efficient manner. The Board has previously determined that APPrO has been eligible for cost awards, for example in the NGEIR proceeding and in the combined proceeding for 2008 rates for Enbridge and Union Gas Limited. It is appropriate for the Board to do so again in the context of this proceeding, in light of the issues that this proceeding raises.

Please direct all notices and all materials related to the above-noted proceeding to:

Association of Power Producers of Ontario
P.O. Box 1084
Station F, Toronto,
Ontario, M4Y 2T7

Attention: David Butters, President

Tel: (416) 322-6549 x 231
Fax: (416) 481-5785
Email: david.butters@appro.org

and

Ogilvy Renault LLP
Royal Bank Plaza, South Tower
200 Bay Street, Suite 3800
Toronto, ON M5J 2Z4

Attention: Jonathan Myers

Tel: 416.216.1865
Fax: 416.216.3930
Email: jmyers@ogilvyrenault.com

and

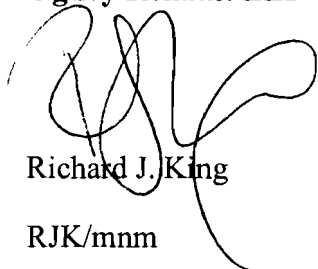
Elenchus Research Associates
34 King St. East, Suite 610
Toronto, Ontario M5C 2X8

Attention: John Wolnik

Tel: 416.348.9910
Fax: 416.348.9930
Email: jwolnik@sympatico.ca

Yours very truly,

Ogilvy Renault LLP



Richard J. King

RJK/mnm

c.c. Norm Ryckman (via email)
Enbridge Gas Distribution Inc.