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October 2, 2024

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON, M4P 1E4

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. ("Enbridge Gas")
Ontario Energy Board ("OEB") File Nos. EB-2024-0186/0197
Motions for Review of OEB Decisions in EB-2022-0111 & EB-2023-0200/0201/0261**

Enbridge Gas is writing to draw the OEB's attention to a procedural point regarding the reply submissions that have now been filed on the review motions and stay requests in these proceedings.

In allowing Ms. Carswell to file reply submissions, the OEB expressly indicated that she only had standing and permission to file reply submissions in respect of her stay request (not the review motion). On page 3 of Procedural Order No. 2 dated August 22, 2024, the OEB stated: "The OEB will also allow Ms. Carswell to file a reply submission, but that reply submission is to be limited to her stay request in respect of the Sandford project. Ms. Carswell is not a moving party and has already filed a submission in support of the Environmental Defence review motion."

In her reply submissions, however, Ms. Carswell did not abide by the above OEB direction. She provided additional submissions relating to the merits of the review motion, besides addressing points regarding her stay request. In doing so, she also sought to raise some new factual details or evidence, which would not be proper reply in any event. Enbridge Gas asks the OEB to bear this in mind as it considers her reply submissions.

Since the procedural order does not provide for sur-reply, we will resist providing further substantive submissions in response to points raised by Ms. Carswell, and we similarly are not doing so in response to the reply submissions of Environmental Defence and FRPO -- but we ask the OEB to carefully review Enbridge Gas's prior submissions when it considers those reply submissions, as those reply submissions contain a number of factual points and characterizations of Enbridge Gas's positions with which Enbridge Gas strongly disagrees.

Sincerely,

Patricia Squires

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Cc: Charles Keizer, Torys (Enbridge Gas Counsel)
Arlen Sternberg, Torys (Enbridge Gas Counsel)