

October 24, 2008

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Ms Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON
M4P 1E4

Dear Ms. Walli:

Re: Application by Enbridge Gas Distribution Inc. Seeking an Exemption from Sections 2.2.2. and 2.2.4 of the Affiliate Relationships Code For Gas Utilities – EB-2008-0275

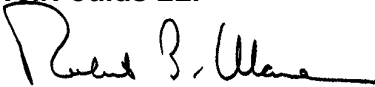
We are Counsel to the Consumers Council of Canada ("Council"). We have the following interrogatories for Enbridge Gas Distribution Inc. ("EGD") regarding its application seeking an exemption from sections 2.2.2 and 2.2.4 of the Affiliate Relationships Code for Gas Utilities ("ARC").

1. Please describe the corporate relationship between EGD and its affiliate, Enbridge Wind Power L.P. ("Wind Power") Please provide a corporate organization chart that illustrates the relationship.
2. Please provide a list of all services currently provided by EGD to Wind Power. Please describe the nature of those services and how the pricing of those services has been determined. Please explain how the revenues are treated.
3. The Application states that, "Enbridge will charge Wind Power for the Control Services in compliance with the Code, on a fully allocated basis." (p. 2/5) How, specifically, has EGD determined what to charge Wind Power for the services? What are the annual costs and revenues associated with the services? Please describe how EGD has determined what is "fully allocated" vs. "incremental".
4. How will the revenues from these services be treated? EGD states that in the granting of this application there would be no cross subsidization of competitive affiliate by EGD. If the revenues are not recorded in a variance account, or are not in the base year revenue requirement, why would this not constitute a cross subsidy of the affiliate by the utility? Please explain.

5. When will the services be provided to Wind Power? Have EGD and Wind Power executed a Service Level Agreement ("SLA") pertaining to the arrangement? If so, please provide a copy of the SLA.
6. Does Wind Power plan to operate other facilities? If so, please describe what those facilities are and when they will be operational?
7. Does EGD plan to provide any other services to Wind Power? If so, please indicate what those services are, how they will be priced, and how the revenues are to be treated.
8. Does EGD plan to provide any similar services to other affiliates? If so, please explain the nature of those services, the affiliates involved, and how those services will be priced.
9. The evidence states that the Wind Power SCADA system and telephone connections are standalone and completely separate from the gas control SCADA and information technology systems and will not affect gas control operations in any way. Were the Wind Power SCADA system and telephone connections funded through distribution rates and part of the utility assets? If not, how were they funded?

Yours very truly,

WeirFoulds LLP



Robert B. Warren

cc: Enbridge Gas Distribution Inc., Attention: Norm Rychman and Tania Persaud
Peter Thompson
Joan Huzar
Julie Girvan

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