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October 30, 2008

Ms. Kirsten Walli **Board Secretary Ontario Energy Board** P.O. Box 2319 2300 Yonge Street 27th Floor Toronto, Ontario M4P 1E4

Dear Ms. Walli:

RE:

Enbridge Gas Distribution Inc. - Application for 2009 Rates

Ontario Energy Board File Number EB-2008-0219

Aegent Energy Advisors Inc. has been retained by the Ontario Association of Physical Plant Administrators (OAPPA) to assist OAPPA on matters related to the above-noted application. Aegent is submitting this letter of intervention on behalf of OAPPA.

OAPPA is seeking status as an intervenor in the EB-2008-0219 proceeding and provides the following information:

- 1. OAPPA is a not-for-profit organization whose membership includes the physical plant administrators for the Ontario universities, a number of whom are customers of Enbridge Gas Distribution. As a result, certain OAPPA member universities will be directly affected by the outcome of this proceeding. Therefore, Enbridge's application for 2009 rates is of direct interest to OAPPA.
- 2. OAPPA expects to be active in the review of the proposed adjustment to delivery rates under Enbridge's incentive rate adjustment mechanism as well as the review of certain of Enbridge's 'Phase 2' requests (e.g., the proposed change in the requirements for the contracting of upstream transportation, the proposed in-franchise title transfer fee, and requested revisions to the Rate Handbook).
- 3. OAPPA expects to seek an award of costs. With respect to the cost eligibility criteria set out in section 3.03 of the Ontario Energy Board's Practice Direction on Cost Awards, in particular criterion (a), OAPPA represents the direct interests of certain ratepayers in relation to regulated services.

- 4. OAPPA takes no position at this time on whether a written or an oral hearing is appropriate noting that the appropriateness of one or the other depends to some extent on the other steps in the review process; in particular, whether or not there is a settlement conference.
- 5. OAPPA has no objection to the two-phased approach proposed by Enbridge for the review of its application.
- 6. OAPPA requests that all correspondence and documents be directed to:

Valerie Young
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A copy of this letter is being delivered to Enbridge Gas Distribution as indicated below.

Should you have any questions, please feel free to contact me.

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Yours truly,

Valerie Young

Director, Research and Analysis

cc. Norm Ryckman, Director, Regulatory Affairs, Enbridge Gas Distribution
John Witjes, Engineering Director, Physical Plant Services, Queen's University