

1 Eva Road, Suite 317 Toronto, Ontario M9C 4Z5 Phone: 416.622.9449 Fax: 416.622.9797

November 19, 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

Pursuant to Procedural Order No. 1 in EB-2008-0219, the Ontario Association of Physical Plant Administrators (OAPPA) offers the following comments on the draft issues list for Phase 1 of the proceeding.

In addition to the items already included on the draft list, OAPPA believes it may helpful to include an item that simply addresses the basic review of the proposed rate adjustment in terms of consistency with the parameters of Enbridge's incentive regulation mechanism; namely,

 Are Enbridge's derivation of the 2009 revenue requirement and assignment of the resulting revenue requirement to rate classes consistent with the parameters of the approved incentive regulation mechanism?

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

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