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November 19, 2008

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

Dear Ms. Walli:

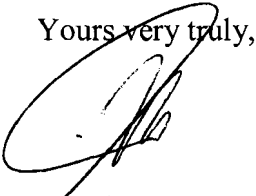
**RE: Enbridge Gas Distribution Inc. - Application for 2009 Rates (EB-2008-0219)
APPrO Comments on Draft Issues List**

In accordance with Procedural Order #1 in the above-noted matter, the Association of Power Producers of Ontario ("APPrO") agrees that the issues identified in the Draft Issues List circulated by the Board are appropriate.

In addition, APPrO supports the November 18, 2008 submissions on the Draft Issues List from the Industrial Gas Users Association ("IGUA"). Specifically, APPrO agrees that the Board should consider expressly including on the issues list the following two issues:

- Has EGD applied the IRM formula mechanics appropriately?
- Is EGD's assignment of the resulting revenue requirement to various rate classes consistent with the approved IRM mechanism parameters?

Yours very truly,



Jonathan Myers

c: Norm Ryckman, EGD
Fred Cass, Aird & Berlis LLP (Counsel to EGD)