

500 Consumers Road North York ON M2J 1P8 P.O. Box 650 Scarborough, ON M1K 5E3

Robert Bourke

Manager, Regulatory Proceedings Tel 416-495-616 Fax 416-495-6072

Email robert.bourke@enbridge.com

November 19, 2008

## **VIA COURIER**

Ms Kirsten Walli **Board Secretary Ontario Energy Board** 2300 Yonge Street, Suite 2700 Toronto, Ontario M4P 1F4

Dear Ms Walli:

Re: **Enbridge Gas Distribution Inc.** 

> April 1, 2009 - the new CIS System "Go-Live" Schedule and a requirement to advance the scheduled April 1, 2009 QRAM proceeding to March 1, 2009

In anticipation of the commencement of bill production with the new CIS system in early April of 2009, the Company has given consideration to potential complications and disruptions that could arise during the initialization of this major IT project.

The CIS implementation team has identified the operational step to incorporate a rate change between the billing of customer accounts for the month of March and the first billing run for the month of April as a potential complication that should be avoided.

March bills will be the last produced using the legacy CIS system. It will also be necessary to finalize billing information for the first quarter of the Company's 2009 fiscal year. The limited time period between the production of the last March bills and the production of the first April bills will be challenging as there will need for a massive effort to shift/swap/check/prove the accounts, files, software, billing outputs, server performance and results.

In order to mitigate this potential complication from the implementation process. the Company has determined that it will need to advance the normally scheduled April 1 QRAM adjustment to commodity prices by one month, to March 1, 2009. This change in the schedule for QRAM commodity price changes will be a single event affecting the April 1, 2009 scheduled QRAM only.

Ms Kirsten Walli November 19, 2008 Page 2

In the Company's deliberations and consideration of the requirement for a rate change between the January 1 and July 1 scheduled rate changes in 2009, it was determined that a change to reflect current commodity prices was required. That is, the Company did not believe that it would be appropriate to 'skip' a commodity rate change in that six month time frame. Further, the potential to delay the April 1 QRAM by one month was dismissed as it could further complicate the Company's ability to implement the new CIS system.

The company has examined the internal requirements of advancing the April 1, 2009 QRAM to March 1, 2009 and believes that it can do so with minimal disruption to billing, insert and evidence preparation schedules.

As a result, the Company is planning to file an application in accordance with the approved QRAM guidelines on or before January 30, 2009 for a QRAM commodity rate change effective March 1, 2009.

Yours truly,

Robert Bourke

Cc: Mr. F. Cass, Aird & Berlis LLP

All Interested Parties EB-2008-0219