

December 5, 2008

DELIVERED AND FILED VIA RESS

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

Dear Ms Walli:

**Re: EB-2006-0034: Enbridge Gas Distribution application re. open bill issues:
request for extension to filing date**

We represent Enbridge Gas Distribution Inc. (EGD).

We write on behalf of EGD, and participants in the ongoing consultative/stakeholder process related to open bill issues, to request an extension of the date on which EGD must file its application proposing comprehensive billing services and bill insert offerings. The current deadline for this application is December 31, 2008. EGD and the most active members of the open bill consultative/stakeholder committee request and extension of this date to February 13, 2009. The reasons for this request are set out below.

Background

In EGD's F2007 rate proceeding, settlements were reached between interested parties in respect of certain issues related to "open bill access" issues.¹ These settlements were reached as a result of a consultative process involving EGD and interested stakeholders, and were approved by the Board as part of the Decision with Reasons in the EB-2006-0034 proceeding.²

One of the main aspects of these settlements was that EGD would implement interim solutions for third party billing (billing services) and bill inserts using the Company's existing CIS system, and that these approaches would be replaced by a "comprehensive solution" to be put in place when EGD's new CIS system is operating.

The settlements contemplated that EGD would undertake a number of steps to arrive at this comprehensive solution. One was the establishment of a "stakeholder committee",

¹ EB-2006-0034, Ex. N1-1-1, Schedules C and D.

² The billing services settlement was agreed to by all parties, and was approved by the Board; there was some opposition to the settlement related to bill inserts, but it too was approved by the Board, with modest changes (see EB-2006-0034 Decision with Reasons, as pp. 35-37).

including users of billing services/bill inserts and ratepayer representatives, to meet with the Company to address issues related to open bill services. Another was that an independent consultant would be retained to undertake a costing and pricing analysis for EGD's billing services and bill inserts. Ultimately, the settlements direct EGD to file an application to the OEB "prior to the end of 2008" proposing comprehensive billing services and bill inserts offerings. This application is supposed to include, among other things (i) a report on EGD's experience under the "interim solutions"; (ii) the independent consultant's report(s); (iii) reports or minutes of meetings with the stakeholder committee; and (iv) the Company's proposal about whether and on what terms billing services should continue.

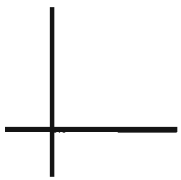
Current Status

The stakeholder committee, which is largely comprised on members of the consultative group that reached the open bill access settlements in the 2007 rate proceeding, has continued its work over the past 18 months. All parties agreed on retaining TMG Consulting (TMG) as the independent consultant to undertake the costing and pricing analysis of EGD's billing services and bill inserts. The stakeholder committee has been meeting regularly, and providing input to and receiving updates from TMG as it prepares its report.

On December 1, 2008, TMG presented its pricing model to the stakeholder committee for discussion. This pricing model will form a large part of the basis for TMG's report to EGD and the consultative group/stakeholder committee. At present, TMG anticipates being able to present a draft report by December 12, 2008, and a final report by December 19, 2008. TMG's report will be included with EGD's application proposing comprehensive billing services and bill insert offerings, and the conclusions in that report will likely influence the proposals made in EGD's application.

Many of the members of the stakeholder committee, including EGD, are concerned that the timelines leading up to the filing of EGD's application are too tight. In particular, there is not much time for the members of the consultative/stakeholder committee to make meaningful comments about TMG's draft report or for TMG to consider those comments before finalizing the report. In addition, there will not be any opportunity for EGD to present its proposed "comprehensive solution" to the consultative/stakeholder committee in advance of filing with the OEB (because EGD's application cannot be completed until after TMG's final report is received). All parties believe that it would be beneficial for EGD to share its proposed application, including its "comprehensive solution", with the consultative/stakeholder committee before it is filed with the OEB. This would allow EGD to consider comments received before finalizing the application. In addition, it might allow for some aspects of EGD's application to be settled and presented to the OEB as having been accepted or agreed upon by members of the consultative/stakeholder committee.

We write, therefore, with the support of the most active members of the consultative/stakeholder committee (who are largely the same parties who signed the settlement agreements in the F2007 proceeding), to request that the deadline for EGD to file its application in respect of open bill services issues be extended to Friday, February 13, 2009. This will allow for a more meaningful comments process on TMG's report, and it will allow for EGD to present and discuss its draft application with members of the consultative/stakeholder committee.

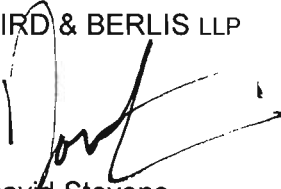


Given that the current December 31st deadline is quickly approaching, we respectfully request a response to this request as soon as possible.

Please contact me should you have any questions.

Yours very truly,

AIRD & BERLIS LLP

A handwritten signature in black ink, appearing to read 'David Stevens', written over the printed name.

David Stevens

cc. Enbridge Gas Distribution
Members of the Open Bill Consultative
All parties registered in EB-2008-0219 (EGD's 2009 rate adjustment proceeding)

