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Enbridge Gas Distribution
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VIA COURIER

November 9, 2017

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

**Re: Enbridge Gas Distribution Inc.
2018 Cap and Trade Compliance Plan (“Application”)
Ontario Energy Board (“Board”) File Number EB-2017-0224**

Please find attached copies of the Application and supporting evidence of Enbridge Gas Distribution Inc. (“Enbridge” or “Company”) seeking an order or orders approving and/or accepting its 2018 Cap and Trade Compliance Plan (“Compliance Plan”) and approving or fixing rates and/or charges to recover the costs incurred undertaking its Cap and Trade Compliance Plan. This filing is made in accordance with the Board’s *Regulatory Framework for the Assessment of Costs of Natural Gas Utilities’ Cap and Trade Activities*, EB-2015-0363, September 26, 2016 (the “Framework”).

The Application is being filed in two formats. One format is filed in its entirety and contains information that is strictly confidential and for consideration by only the Board. The second format is the version that may be placed on the public record. This version excludes exhibits that are strictly confidential and redacts other exhibits. The Company has followed the usual Board protocols for such filings in that Exhibits filed as Strictly Confidential have been printed on coloured paper and are marked “Confidential” on each page.

Enbridge believes that it is appropriate to highlight three matters for the benefit of the Board and Stakeholders.

Confidentiality

The Board has recognized in the Framework that because of the specific statutory prohibitions against disclosure of certain types of information and the general prohibitions against certain types of conduct (insider trading, market manipulation etc.) which exist in the *Climate Change Mitigation and Low-carbon Economy Act, 2016, S.O. 2016, c. 7*, (“Climate Change Act”), that key parts of Enbridge’s Compliance Plan filing must necessarily be received and treated strictly confidential. The Framework and

Filing Guidelines have therefore identified two types of information that will be treated strictly confidential: Auction Sensitive Information and Market Sensitive Information.

The Board states at page 10 of the Framework that: “Although the Practice Direction does not require a party to request confidential treatment of information designated as confidential in filing guidelines or forms, for greater certainty the OEB will require Utilities to clearly identify information for which they seek strictly confidential designation”. The Filing Guidelines then go on at page iii to list the information which the Board requires in support of a utilities claim for strictly confidential or confidential treatment.

In satisfaction of the requirements of the Framework and Filing Guidelines, the Company has prepared and included in this filing Exhibit A-3-1 “Confidentiality”. This Exhibit sets out the reasons why strictly confidential treatment is appropriate where claimed and identifies and explains the treatment of each Exhibit in this filing as being either Confidential, Redacted or Public. The Company notes that it is not seeking confidential treatment under the Board’s Practice Direction for “other” confidential information.

Where an Exhibit has been determined to be Strictly Confidential, the Exhibit in its entirety has been deemed Confidential and is filed in strict confidence for the Board’s consideration only. The Company is of the view that there would be no practical benefit in filing a redacted version of several of the exhibits given the extensiveness of the redacting. Where only some sections of an Exhibit are determined to be Strictly Confidential, it has been redacted and the redacted version is being filed on the public record. All other Exhibits are considered to be Public and are so filed.

Interim Tariffs

Enbridge’s Application (Exhibit A, Schedule 2, Tab 1) in this proceeding requests, amongst other things, that Interim Cap and Trade Tariffs be approved on or before December 1, 2017 in order that 2018 Interim Cap and Trade Tariffs can be included with Enbridge’s Quarterly Rate Adjustment Mechanism (“QRAM”) Application and implemented as of the Cap and Trade start date of January 1, 2018. Enbridge believes that it is in the best interests of ratepayers that updated 2018 Cap and Trade tariffs be effective as of this date so as to avoid burdening ratepayers with higher tariffs later in the year as a result of the non-recovery of appropriate revenues in the first several months.

Early Approval of RNG Procurement Model

Enbridge’s evidence includes (at Exhibit C, Tab 5, Schedule 2) a proposed model through which Enbridge plans to procure renewable natural gas (“RNG”) to meet some of the Company’s gas supply requirements. As set out in the Application, Enbridge requests approval of the RNG procurement model as early as possible, and no later

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than the end of January 2018, so that important local sources of RNG can be procured for the longer term benefit of Ontarians inclusion in the Company's gas supply.

The Application has been filed through the Board's Regulatory Electronic Submission System and will be available on the Enbridge website at:
www.enbridgegas.com/ratecase.

Please contact the undersigned if you have any questions.

Yours truly,

[original signed]

Andrew Mandyam
Director, Regulatory Affairs, Financial Planning and Analysis

cc: Mr. D. O'Leary, Aird & Berlis LLP
Mr. D. Stevens, Aird & Berlis LLP
All Interested Parties EB-2016-0300 (via email)