

GEC INTERROGATORY #3

INTERROGATORY

Regarding Exh. A/Tab 1/Sch 3/p. 11, paragraph 26: Enbridge states that “the March 4, 2016 letter from the Board did not contemplate that OEB Staff could unilaterally alter or change the scope of DNV’s work already underway.”

- a) Is Enbridge suggesting that the Board’s letter explicitly prohibited Board Staff from altering DNV’s scope of work? If so, please explain the basis for that interpretation, including references to specific language in the letter that supports Enbridge’s interpretation.
- b) If the answer to part “a” of this question is “no”, is Enbridge suggesting that the Board’s letter would have had to explicitly direct Staff to change the scope of work in order for Staff to be permitted to make any changes? If so, what is the basis for that conclusion?

RESPONSE

- a) No.
- b) No. Please reference Enbridge’s response to SEC Interrogatory #3, found at Exhibit I.EGDI.SEC.3.