

SEC INTERROGATORY #11

INTERROGATORY

[A/1/3, p. 14, 19] Please provide a head to head comparison of the prior experience and expertise of each member of OEB Staff involved in the work of the EAC, relative to the prior experience and expertise of each representative of the Applicant that attended EAC meetings on behalf of the Applicant. Please provide full CVs for each of those included in the comparison. If you do not have the full CVs for the relevant OEB Staff, please request them from the Board.

RESPONSE

Enbridge surmises that this interrogatory originates from a misinterpretation of Enbridge's commentary in the sections referenced (Exhibit A, Tab 1, Schedule 3, page 14 and 19). To provide some context to the references, Enbridge notes Board Staff's lack of experience from the perspective of taking on the new role of EAC Coordinator, a role that had not previously resided with Board Staff.

Enbridge is not challenging the curriculum vitae of individual Board Staff members, rather it was simply commenting on a "perfect storm" of limited experience as an organization in taking on this oversight role, an initial delay in getting started with the new responsibility of overseeing the evaluation and audit responsibilities, coupled with a lack of clarity and ambiguity regarding the operative roles, responsibilities and expectations of the respective parties to the EAC structure.

Witnesses: D. Bullock  
D. Johnson