

SEC INTERROGATORY #33

INTERROGATORY

[A/1/3, p. 33] Please provide copies of all written comments to the EC, EAC and OEB Staff. Please divide those comments into those i) accepted, ii) appropriately resolved, iii) “not addressed”, and iv) “not appropriately resolved”.

RESPONSE

It is Enbridge’s view, that the depth and breadth of attempting to expend the necessary time and effort to address the voluminous request of compiling the copious aggregate comments of all participants in this process across a myriad of documents, reports and emails and attempting to judge how each of those comments should be catalogued would be unreasonable in terms of the time commitment required and would be completely out of proportion relative to the limited value, if any, that it would provide the Board in this proceeding.

Further, as outlined in Enbridge’s response to SEC Interrogatory #17, found at Exhibit I.EGDI.SEC.17, Board Senior Counsel advised in June of 2017 that requests for the production of comments provided by other participants to the evaluation process should be considered by the Board panel. Enbridge therefore declines to produce the comments of other participants at this time.

Enbridge, along with other EAC members provided views, opinions, feedback and comments (verbal and written) to OEB Staff and the EC throughout this process. Much of this commentary was well considered. Some of the comments were administrative (making corrections, addressing presentation of data, etc.). Some sought clarity and asked questions while others were highly relevant to the contributing party. This being said, it is with respect to those specific issues raised by Enbridge during the 2015 evaluation process that it has identified in this proceeding that it continues to have particular concerns. Enbridge has discussed these in its evidence and refers to the Company’s response to Board Staff Interrogatory #11, found at Exhibit I.EGDI.STAFF.11 for additional detail.

Witnesses: D. Bullock
D. Johnson