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September 3, 2010

VIA COURIER

Ms. Kristen Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

Re: Ontario Energy Board File No. EB-2010-0245
Notice of Proposal to Revoke and Re-issue the Electricity Retailer and Gas
Marketer Codes (the "Codes") and to Amend the Gas Distribution Access
Rule (the "GDAR").

Further to the Ontario Energy Board's (the "Board") Notice issued on August 12, 2010 regarding the above noted proceeding, enclosed please find the submission of Enbridge Gas Distribution.

The submission has been filed through the Board's Regulatory Electronic Submission System (RESS).

Please contact the undersigned if you have any questions.

Yours truly,

A handwritten signature in blue ink that reads "Bonnie Jean Adams".

Bonnie Jean Adams
Regulatory Coordinator

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15, Sch. B, as amended;

AND IN THE MATTER OF the Board's Notice of Proposal to Revoke and Re-issue the Electricity Retailer and Gas Marketer Codes (the "Codes") and to Amend the Gas Distribution Access Rule (the "GDAR").

SUBMISSION OF ENBRIDGE GAS DISTRIBUTION INC. ("ENBRIDGE")

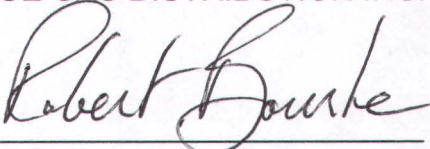
1. The Board invited interested parties to file comments by September 3, 2010. As one of the gas utilities that provides billing services to gas marketers, and is subject to the GDAR, Enbridge wishes to make a brief submission for the purpose of this proceeding, set out below.
2. Although Enbridge is not directly subject to the Codes, the draft regulations under the Energy Consumer Protection Act, 2010 (the "Regulations") taken together with the Board's proposed amendment to the GDAR inevitably will impact Enbridge's business systems and processes. Enbridge is an active participant in the GDAR Electronic Business Transaction ("EBT") Standards Working Group, and has made submissions to the government regarding the Regulations. We wish to ensure that our systems and processes are aligned with the EBT standards, and that there is sufficient time and resources to make any required changes in an effective and efficient manner.
3. Enbridge anticipates that EBT processes will need to change to implement the Regulations, the Codes, and the amended GDAR. We will need to work through those details with the EBT Standards Working Group, and report back to the Board by September 10, as requested. By way of

example, new timelines and trigger events for contract cancellation permitted by the Regulations will likely require system and process changes.

4. In order to implement the required changes, Enbridge expects to incur additional operations and maintenance, and potentially capital expenses. Enbridge will record these costs in its 2010 GDAR Costs Deferral Account, and seek disposition of those costs at the appropriate time. We request that the Board provide timely notice of any concerns with this proposed cost accounting.
5. Until the details are known, Enbridge will also not know how quickly any required changes can be made and implemented. We will provide updates in this regard through the EBT Standards Working Group, and other forums that the Board and the government may make available.
6. Enbridge has no further comments on the Board's proposed amendments to the Codes or the GDAR at this time. We appreciate this opportunity to make submissions, and look forward to providing further input into the implementation process as necessary.

DATED: September 3, 2010 at Toronto, Ontario.

ENBRIDGE GAS DISTRIBUTION INC.

Per: 
Norm Ryckman,
Director Regulatory Affairs