



500 Consumers Road  
North York, Ontario M2J 1P8  
PO Box 650  
Scarborough ON M1K 5E3

**Robert Bourke**  
Manager, Regulatory Proceedings  
Tel: 416-495-5616  
Fax: 416-495-6072  
Email: robert.bourke@enbridge.com

January 17, 2011

**VIA COURIER**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Enbridge Gas Distribution Inc. ("Enbridge" or the "Company")  
Ontario Energy Board (the "Board") Docket Number - EB-2011-0002  
Draft 2011 - 2014 Business Plan**

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On January 4, 2011, the Board issued a notice inviting interested stakeholders to review and comment on the Board's draft 2011-2014 Business Plan (the "Plan"). As a natural gas distributor subject to the Board's regulation, Enbridge offers these general comments.

Understandably, the Plan has the Board continuing its strong focus on rate and customer bill impacts. This objective needs to be considered in the context of the overall rate impacts, many of which are beyond the control of Enbridge and other gas distributors (e.g., costs of gas supply and transportation to Ontario, governmental policy, legislative changes, aging infrastructure, market dynamics, etc.). Gas distributors should not be restricted from implementing appropriate rate increases required to properly manage their businesses, and to remain financially viable, in keeping with Plan objective 3.1.3 and the Board's obligation to both ratepayers and shareholders in this regard.

We note that the Plan does not identify any rate-making activities for 2012 and 2013. However, as the Board notes, both Enbridge and Union Gas will be bringing forward rebasing and incentive rate applications in 2011 that will require review and adjudication in 2012. In addition, these distributors will be making quarterly applications for rate adjustments each year.

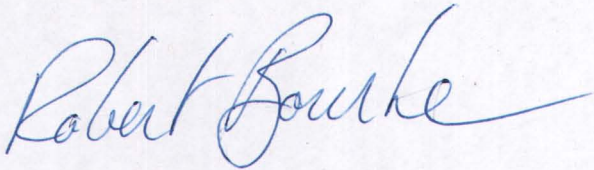
Enbridge agrees that energy conservation remains an important objective, and the gas distributors are uniquely qualified and capable to assist with achievement of the Ontario government's conservation goals. We look forward to working through program elements and related initiatives with the Board.



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Finally, we are pleased to see the Board's continuing desire to be responsive to changing dynamics in the North American natural gas market. This will have a positive influence on the ability of Ontario distributors to adapt their business as required to participate in this market effectively. For instance, renewable energy is increasingly important both locally and globally, and Enbridge is committed to supporting and developing sustainable and financially viable renewable energy supply sources in a manner consistent with government policy.

Yours truly,

A handwritten signature in blue ink that reads "Robert Bourke". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Robert Bourke  
Manager Regulatory Proceedings