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Enbridge Gas Inc.
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Canada

November 17, 2022

VIA EMAIL and RESS

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File: EB-2022-0086
Dawn to Corunna Replacement Project
Comments on Cost Claims**

Pursuant to the OEB's Decision and Order for the above noted proceeding, Enbridge Gas has received cost claim submissions from the following parties:

- Canadian Association of Energy and Pipeline Landowner Associations (CAEPLA)
- Canadian Manufacturers & Exporters (CME)
- Energy Probe
- Environmental Defense (ED)
- Federation of Rental-housing Providers of Ontario (FRPO)
- Industrial Gas Users Association (IGUA)
- Pollution Probe
- School Energy Coalition (SEC)
- Three Fires Group (TFG)

Enbridge Gas has reviewed the cost claims filed by parties and recommends that the OEB consider the points set out below when reviewing the cost claims made by TFG.

Within its Procedural Order No. 1, dated May 24, 2022, the OEB stated that, "Cost eligible intervenors should be aware that the OEB will not generally allow the recovery of costs for the attendance of more than one representative of any party, unless a compelling reason is provided when cost claims are filed." Despite this guidance, TFG's cost claims reflect the participation of 6 representatives.

Additionally, TFG's cost claims by far exceed those claimed by all other parties to the proceeding, being nearly 2.5 times the average of all other parties and exceeding the next highest level of costs claimed by a party by more than \$10,000 (35% higher).

The OEB should consider the amount of TFG's total claim compared to the cost claims made by other intervenors and in relation to its guidance regarding the appropriate number of participants and the unique and incremental value TFG added to the proceeding

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Please contact the undersigned if you have any questions.

Yours truly,

Adam Stiers
Manager, Regulatory Applications – Leave to Construct

c.c. Charles Keizer (Torys)
Intervenors (EB-2022-0086)