

# COMSATEC INC

Energy Management

Electricity & Natural Gas

RECEIVED

November 7<sup>th</sup>, 2011.

**Kirsten Walli**  
Board Secretary.

NOV 15 2011

**The Board**

Ontario Energy Board  
P.O. Box 2319.  
27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario, M4P 1E4

5/14/11 ONTARIO ENERGY BD

Re: **File # EB 2011 – 0242.**

**Enbridge Gas Distribution and Union Gas Limited**

Dear Secretary;

Kind accept this letter as our “Comments” related to the Board hearing and the proposal that Enbridge and Union Gas propose to acquire biomethane as part of their respective supply portfolios for customers who purchase natural gas from the companies.

Comsatec submits our objection for the proposal, for reasons that;

- The proposal is irresponsible and perhaps ludicrous towards the utility’s existing customer base.
- The biomethane producers and their projects should stand on their own in utilizing the biomethane gas as energy.
- Without the economics of a landfill site not standing on their own, gas customer will subsidize landfill or biomass methane projects, which is not acting.
- The uncertainty of the production, gas volumes in future may create a liability.
- Future garbage dump site may contain less or little organic waste, therefore not producing larger volumes or any biomethane.
- The continuous accurate measurement of the biomethane heat content, in our mind, is difficult and therefore may become an unnecessary cost to the utility’s customers.
- That the proposed fee or flat rate increase of \$ 1.50 per month per customer is excessive and irresponsible.

Comsatec appreciates the opportunity to submit our comments. This letter may be copied and made available “as is” to any party participating in this hearing.

Yours truly,



P.A.M. Waqué