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VIA MAIL and E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

Re: EB-2011-0242 and EB-2011-0283
Enbridge Gas Distribution and Union Gas Limited -Renewable Natural Gas
Comments on behalf of Vulnerable Energy Consumers Coalition (VECC)

We are writing in response to procedural order 2 which invites the parties to provide written submissions on the "process issue" and, in particular, the appropriateness of dividing the proceeding into two phases.

On reviewing the draft issues list VECC agrees generally with several of the parties who have suggested that providing for a staged approach to this proceeding may be the most efficient way for the Board to conduct the hearing.

With respect to the (admittedly) draft list of issues, there is a series of threshold questions and lines of inquiry that fall within the general heading "Role of the Utilities" which can be described as relating to the issue of whether the applicants should be engaged in Renewable Natural Gas Program at all. In VECC's view that issue appears to be distinct from the particulars of how the proposed programs would operate with respect to the Pricing Framework, Volume Caps, and Supporting Structure, the other three general headings in the draft issues list.

All the issues could obviously be heard and disposed of at the same time in a single oral hearing. However it appears to VECC that that the evidence, interrogatories and oral hearing related to the issues under the headings Pricing Framework, Volume Caps, and Supporting Structure would be entirely irrelevant if the Board were to, for example, determine that the applications do not fit within the Objectives for natural gas under the OEB Act and the proposed

role for both Enbridge and Union in developing and implementing a RNG program is not reasonable and appropriate.

Accordingly VECC believes that there is merit in the consideration of a phased approach which would create a phase 1 to the proceeding limited to issues concerning the Role of the Utilities, including interrogatories and, possibly, an oral hearing on those issues. Phase 2 would consider the remaining issues under Pricing Framework, Volume Caps, and Supporting Structure if the Board's decision in Phase 1 required the Board to make further findings with respect to those issues.

Yours truly,



Michael Buonaguro
Counsel for VECC