

January 10th, 2012

Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor,
Toronto, ON M4P 1E4

Via RESS, Electronic Mail and Courier

Dear Ms. Walli:

Re: EB-2011-0242 and EB-2011-0283, Renewable Natural Gas (“RNG”) Program Application

Just Energy Ontario L.P. (“Just Energy”) respectfully submits the following comments in response to Procedural Order No. 2 issued December 19th, 2011 for the above referenced application before the Ontario Energy Board (“OEB” or “the Board”) as submitted by Enbridge Gas Distribution Inc. (“EGD”) and Union Gas Ltd. (“Union”), collectively referred to as “the Applicants”, on September 30th, 2011.

Just Energy believes that the suggestion made in response to Procedural Order No.1 recommending the division of this application’s proceeding into two phases is appropriate. Determining whether or not it is appropriate for the Board to consider this application could be considered a prerequisite to the Board’s consideration of the application itself. The creation of an initial phase to consider this issue will foster efficiency and clarity by distinctly separating the question of appropriateness from the broader application.

Should you have any questions or comments in response to these comments please do not hesitate to contact Nola Ruzycski, Vice President Regulatory Affairs Canada, or Brandon Ott, Manager Regulatory Affairs Canada.

Yours truly,



Nola L. Ruzycski
Vice President, Regulatory Affairs Canada
Tel: 403.462.4299
Fax: 905.564.6069
nruzycki@justenergy.com



Brandon Ott
Manager, Regulatory Affairs Canada
Tel: 905.670.4440 ext. 71479
Fax: 905.564.6069
bott@justenergy.com

CC: Norm Ryckman, Enbridge Gas Distribution Inc., EGDRegulatoryProceedings@enbridge.com (via email only)
Fred Cass, Aird & Berlis, fcass@airdberlis.com (via email only)
Chris Ripley, Manager-Regulatory Application, Union Gas Limited CRipley@uniongas.com (via email only)
Crawford Smith – Torys csmith@torys.com (via email only)
Intervenors