

February 17, 2016

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

Dear Ms. Walli:

**RE: EB-2015-0029 / EB-2015-0049 Union Gas Limited and Enbridge Gas Distribution Inc. – 2015-2020 DSM Plans – Union Gas Limited Comments on Cost Claims**

Union Gas Limited (“Union”) received cost claims from the Association of Power Producers of Ontario (“APPRO”), Building Owners and Managers Association of Ontario (“BOMA”), Consumers Council of Canada (“CCC”), Canadian Manufacturers & Exporters (“CME”), Energy Probe, Federation of Rental-housing Providers of Ontario (“FRPO”), Green Energy Coalition (“GEC”), Industrial Gas Users Association (“IGUA”), Low-Income Energy Network (“LIEN”), London Property Management Association (“LPMA”), Ontario Greenhouse Vegetable Growers (“OGVG”), Ontario Sustainable Energy Association (“OSEA”), School Energy Coalition (“SEC”) and Vulnerable Energy Consumer’s Coalition (“VECC”) for the above noted proceeding.

Union has reviewed the cost claims and notes the total amount claimed for both proceedings is significant – in excess of \$1.4 million. There is also a wide range in the size of cost claims, from a low of \$25,000 to a high of over \$480,000 including HST. Union recognizes the joint nature of the proceeding and the complexity involved with a multi-year application, however Union is very concerned about the total amount of costs being claimed.

In particular, GEC’s cost claim is striking. In its cost claim, GEC states, “[w]e expect that GEC’s claim will be significantly larger than other parties due to GEC’s extensive role in this matter”, and then provides some further explanation of the level of GEC and its consultants’ involvement in the proceeding. Union recognizes GEC’s involvement in the proceeding was more extensive than other parties, as it engaged two consultants who provided expert reports. In Union’s view, however, the amount of time and expense claimed by GEC is excessive.

GEC’s amount claimed is more than three times the amount claimed by the intervenor with the next highest cost claim. GEC claims 1,615 total hours for both EB-2015-0029 and EB-2015-0049, while the other 11 intervenors average approximately 200 hours each. The amount claimed includes a significant amount of preparation time for David Poch and Kai Millyard. In addition to the time claimed for experts Chris Neme and Paul Chernick, there are hours claimed by others at Energy Futures Group, Inc. and Resource Insight, Inc. In total, there are hours from ten separate people in the GEC cost claim.

Union requests that the Board carefully scrutinize all costs being claimed by GEC and other intervenors to ensure that the total costs recovered are proportional to the value provided.

Yours truly,

*[original signed by]*

Vanessa Innis  
Manager, Regulatory Initiatives

c.c.: Alex Smith (Torys)  
Valerie Bennett  
Intervenors EB-2015-0029