

February 17, 2016

BY COURIER & RESS

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
Toronto, Ontario M4P 1E4

RE: EB-2015-0029 – Union Gas Limited 2015-2020 DSM Plan – Revised Accounting Order

Dear Ms. Walli,

On February 10, 2016, Ontario Energy Board (“OEB”) staff filed a submission in response to the draft DSM Cost-Efficiency Incentive Deferral Account accounting orders (the “DSMCEIDA Order”) filed by each of Union Gas Limited (“Union”) and Enbridge Gas Distribution Inc. (“Enbridge”) in letters dated February 3, 2016. Union’s attached revised DSMCEIDA Order reflects changes in response to OEB staff’s submission.

In its submission, OEB staff suggests the last sentence of the account description should read, “[a]ny approved DSMCEIDA amounts will be available to use in meeting the Company’s targets in a subsequent year over the 2015-2020 DSM term as determined by the OEB.” Union agrees that the OEB will review and approve DSMCEIDA amounts within the context of Union’s and Enbridge’s annual disposition of DSM deferral accounts proceedings, and this step is captured in the beginning of the sentence. Once the DSMCEIDA amounts are approved, it is Union’s understanding that the utilities have discretion to use the amounts in a subsequent year over the 2015-2020 term, without requiring OEB approval to use the funds. As such, the attached revised DSMCEIDA Order removes the wording “as determined by the OEB”.

If you have any questions with respect to this submission please contact me at 519-436-5334.

Yours truly,

[original signed by]

Vanessa Innis
Manager, Regulatory Initiatives

cc: Valerie Bennett, Board Staff
Alex Smith, Torys
All Intervenors (EB-2015-0029)

Encl.

UNION GAS LIMITED

**Accounting Entries for
Demand Side Management Cost-Efficiency Incentive Deferral Account (“DSMCEIDA”)
Deferral Account No. 179-150**

Account numbers are from the Uniform System of Accounts for Gas Utilities, Class A prescribed under the Ontario Energy Board Act.

Debit	-	Account No. 728 General Expense
Credit	-	Account No. 179-150 Other Deferred Charges – DSMCEIDA

The purpose of the DSMCEIDA is to record, as a credit in Deferral Account No. 179-150, the differences between the gas utilities’ annual approved DSM budgets and the actual amount spent to achieve the total aggregate annual lifetime savings (cumulative cubic metres of natural gas, or CCM) targets made up of all 100% CCM targets across all programs, in accordance with program evaluation results. Any approved DSMCEIDA amounts will be available to use in meeting the Company’s targets in a subsequent year over the 2015-2020 DSM term.