



By Email

August 7, 2007

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Dear Ms Walli

**Union Gas Limited**  
**Order Rescinding Union's E.B.O. 166 Blanket Storage Order**  
**Board File No.: EB-2007-0679**  
**Our File No.: 302701-000389**

As solicitors for the Industrial Gas Users Association ("IGUA"), we are writing to provide our client's brief submissions with respect to Union's request to reinstate the "Blanket Storage Order" status quo which prevailed prior to the issuance by the Board of its November 7, 2006 NGEIR Decision with Reasons (EB-2005-0551) and the related February 5, 2007 Order attached to Union's letter to the Board dated July 4, 2007.

IGUA supports the reinstatement of the "Blanket Storage Order" status quo for in-franchise customers, as Union has requested.

IGUA notes that the scope of the "Blanket Storage Order" reinstatement will need to be broadened in the event that the Cabinet responds favourably to the Petitions submitted by IGUA and others requesting that the NGEIR Decision be set aside and the value of service storage regulation which preceded the issuance of the NGEIR Decision be reinstated.

We apologize for being unable to meet the August 3, 2007 deadline specified in Procedural Order No. 1 with respect to the relief requested by Union in this particular application. Mr. Newton, the President of IGUA, is currently in Calgary in the midst of completing arrangements to move his family from Calgary to Ottawa. In addition, my availability to discuss this matter with Mr. Newton before August 3, 2007, was considerably constrained. In combination, these circumstances have resulted in our inability to complete IGUA's submissions on this matter until today.

In all of these circumstances, we respectfully request a filing deadline extension for IGUA's submissions herein to August 7, 2007.

Yours very truly

A handwritten signature in black ink, appearing to read 'P. Thompson', is written over a horizontal line.

Peter C.P. Thompson, Q.C.  
PCT\slc

c. Mike Packer (Union Gas Limited)  
Murray Newton (Industrial Gas Users Association)  
Vince DeRose (Borden Ladner Gervais)

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