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March 27, 2009

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Ontario Energy Board
P.O. Box 2319, 26th Floor
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Reference: 9483/3640

Attention: Ms. Kirsten Walli, Board Secretary

**Re: EB-2008-0411: Union Gas Limited ("Union")- Application for Leave to Sell
Union's Additional Comments on Draft Issues List**

Dear Ms. Walli:

Union would like to briefly comment on the letters of March 27, 2009 received from GAPLO and FRPO.

With respect to GAPLO's comments, Union submits that the OEB can consider the implications for the landowners of the transfer of the St. Clair Line to an NEB regulated entity without ruling on whether the NEB will in fact have jurisdiction.

Union believes that the two questions proposed in FRPO's letter of March 23, 2009 are inappropriate as worded because they are too generic. Whether leave to sell assets should be granted in any particular application should depend on the particular facts and circumstances of the case. Union agrees, however, that the issues raised by FRPO in those questions as they relate to this application specifically would be acceptable.

Yours truly,

Sharon Wong

c: All Intervenors in EB-2008-0411