



***PUBLIC INTEREST ADVOCACY CENTRE***  
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May 15, 2009

**VIA MAIL and E-MAIL**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge St.  
Toronto, ON  
M4P 1E4

Dear Ms. Walli:

**Re: Vulnerable Energy Consumers Coalition (VECC)**  
**EB-2009-0052**

Please find enclosed VECC's submissions in the above noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC  
Encl.

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998,  
c. 15 (Schedule B);

**AND IN THE MATTER OF** AN Application by Union Gas Limited for an  
order or orders amending or varying the rate or rates charged to  
customers as of July 1, 2009

**SUBMISSIONS OF THE VULNERABLE ENERGY CONSUMERS COALITION ("VECC")**

1. Union Gas filed an application and evidence for final disposition and recovery of certain 2008 year-end deferral account balances with the Ontario Energy Board on March 31, 2009.
2. VECC reviewed the pre-filed evidence and the interrogatory requests that were filed early by other parties and determined that issues of concern to VECC had been addressed.
3. VECC has reviewed the responses to the interrogatory requests, including the supplementary request of FRPO, and briefly discussed issues of common concern with intervenors representing LPMA and SEC.
4. Based on VECC's review and consultation, VECC's concern relates to the issues raised by FRPO IR 3.1 and by the Supplementary IR 3.1, namely the 2008 balances in the Long-Term Peak Storage Services deferral account and in the Short-Term Storage and Other Balancing Services deferral account.
5. VECC notes that these issues are discussed in the final submissions of LPMA on pages 1-3. VECC has reviewed these submissions and supports them.
6. VECC submits that it has acted prudently in this proceeding, particularly with respect to coordinating with other intervenors, and requests that it be awarded 100% of its reasonably incurred costs in this proceeding.

All of which is respectfully submitted on this 15<sup>th</sup> of May, 2009.