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May 15, 2009

BY EMAIL & BY COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St, Suite 2701
Toronto ON M4P 1E4

Dear Ms. Walli:

Board File No. EB-2009-0052
Union Gas Limited – Deferral Account Balances
Submission of Energy Probe

Pursuant to the Notice of Written Hearing and Procedural Order Number 1, issued 22 April, 2009, please find two hard copies of the Submissions of Energy Probe Research Foundation (Energy Probe), for the Board's consideration. An electronic version of this communication will be filed in PDF format.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh
Case Manager

cc. Chris Ripley, Union Gas Limited (By email)
Michael Penny, Torsys LLP (By email)
Intervenors (By email)

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EB-2009-0052

**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
ENERGY PROBE RESEARCH FOUNDATION
("ENERGY PROBE")**

May 15, 2009

Submissions of Energy Probe Research Foundation

EB-2009-0052

Introduction

These are the submissions of Energy Probe Research Foundation ("Energy Probe") in response to an Application filed March 31, 2009 by Union Gas Limited ("Union") for clearance of 2008 year-end deferral accounts and other balances to be implemented July 1, 2009.

Account Balances

Energy Probe has reviewed the evidence filed by Union dated March 31, 2009 and the responses it filed to interrogatories.

It is the submission of Energy Probe that in general the deferral account balances appear to be in order and Energy Probe does not oppose the manner of their disposition proposed by Union.

However, this general acceptance does not extend to Storage and Transportation Related Deferral Accounts, namely 179-70 Short-Term Storage and Balancing Services Deferral Account and 170-72 Long-Term Peak Storage Services Deferral Account.

Energy Probe has reviewed the Submissions of the London Property Management Association and supports the analysis of their consultant, Mr. Randy Aiken, in respect of the significant increases in both revenues and costs.

It is the submission of Energy Probe that the Board should grant Union the relief it seeks in clearing these accounts now subject to a final determination of the balances

in a subsequent proceeding where parties are given the opportunity to explore the calculation of those balances.

In summation, Energy Probe supports the further submissions Mr. Aiken has filed in this matter.

Costs

Energy Probe submits that it participated responsibly in this proceeding. Energy Probe requests the Board award 100% of its reasonably incurred costs.

All of which is respectfully submitted this 15th day of May, 2009.

Energy Probe Research Foundation