IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c. 15 (Sched. 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.

SUPPLEMENTARY SUBMISSIONS OF THE LONDON PROPERTY MANAGEMENT ASSOCIATION

These are the supplementary submissions of the London Property Management Association ("LPMA") in the matter of an application by Union Gas Limited ("Union") for approval for final disposition and recovery of certain 2008 year-end deferral account balances. These supplementary submissions are related to the balances in accounts 179-70 (short-term storage and other balance services) and 179-72 (long-term peak storage services).

In LPMA's original submission (May 15, 2009) on the balances in this account it was indicated that LPMA was unable to determine if the resulting amounts in the accounts in question were reasonable. This was due to the significant shift in costs, relative to revenues and the lack of information related to the actual level of storage services provided, relative to forecast.

LPMA has reviewed the information provided by Union in their Reply Argument dated May 22, 2009 and in the response to an interrogatory in EB-2009-0101 at Exhibit B, Tab 3, Schedule 2. In particular, Attachment 3 to Exhibit B, Tab 3, Schedule 2 aligns the 2008 costs with how the costs were approved by the Board for 2007. This realignment to the 2007 Board Approved reporting eliminates the significant variances reported by Union for 2008 as compared to 2007 Board Approved in their original evidence. Cost changes across the various line items now are more reflective of the change in revenues.

As a result, LPMA now believes that amounts recorded in accounts 179-70 and 179-72 are reasonable.

All of which is respectfully submitted this 26th day of May, 2009.

Randall E. Aiken

Consultant to

London Property Management Association

Pandall & Culian