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June 11, 2009

By Courier

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ms. Walli:

Re: EB-2009-0101 – Comments of London Property Management Association on Draft Rate Order

I have reviewed the draft rate order for this proceeding filed by Union Gas on June 9, 2009 on behalf of the London Property Management Association (“LPMA”).

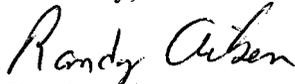
LPMA believes the calculations contained in the Working Papers to the Rate Order (Schedules 1, 2 and 3) accurately reflect the calculation, allocation and unit rate impacts of the earnings sharing for 2008.

In particular, LPMA agrees with the calculation of the earnings sharing amount of \$34.170 million in Schedule 1 of the Working Papers and the calculation of the January 1, through June 30, 2009 interest of \$0.291 million, also shown in Schedule 1. Schedule 2 of the Working Papers reflects the proper allocation of the total earnings sharing amount to the various rate classes based on the allocation of equity. Schedule 3 then shows the calculation of the unit rates for the 6 month prospective refund for rates 01, 10, M1 and M2. LPMA notes that the July through December 2009 forecast delivery volumes used in this calculation are the same forecast figures Union proposed to use in the prospective clearance of deferral and variance accounts in EB-2009-0052.

The figures provided in Appendix A to the draft rate order (Summary of Changes to Sales Rates), Appendix B (General Service Rate Schedules) and Appendix C (Unit Rates for Prospective Refund and One-Time Adjustments) all accurately reflect the figures calculated in the Working Papers.

Finally, LPMA submits that the Draft Decision and Order as filed by Union should be amended to include dates by which intervenors should file their cost award documents, a date by which Union may file any objections to the costs claimed and a date by which intervenors may file any replies to the Union objections.

Sincerely,

A handwritten signature in black ink that reads "Randy Aiken". The signature is written in a cursive, slightly slanted style.

Randy Aiken
Aiken & Associates

Encl.

c.c. Chris Ripley, Union Gas Limited (delivered)