

September 10, 2009

Kirsten Walli, Board Secretary
ONTARIO ENERGY BOARD
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E5

Dear Ms. Walli:

Re: EB-2009-0055 - Enbridge Gas Distribution Inc.'s (EGD) Proposed Change in Timing for Recovery of 2008 Approved Variances/Deferrals.

Comments of the Industrial Gas Users Association (IGUA).

Pursuant to the recently issued Procedural Order No. 3 herein, IGUA submits these brief comments regarding EGD's request to postpone recovery of previously approved 2008 deferral and variance account balances from October and November 2009 to January and February 2010. IGUA does not object to EGD's request.

Few of IGUA's constituents are heat sensitive loads. Accordingly the seasonal timing of the recovery has little impact.

Generally IGUA endorses recovery of amounts deferred from a previous period as close in time to the period deferred from as possible. Such practice supports better price signals for customers.

In this instance, however, IGUA assumes the veracity of EGD's representations that the cutover this fall to EGD's new CIS is a logistically challenging exercise. EGD is of the view that such cutover would be more complex with the addition to bills of the charges/credits related to clearance of 2008 approved variances and deferrals because the charges/credits are calculated based on historical consumption rather than current consumption. In the result, an additional set of data - customer specific historical consumption - would be introduced during the CIS cutover, but for granting of EGD's request to delay the timing for recovery of the 2008 balances.

In these circumstances, IGUA agrees that deferral of the recovery of the 2008 balances to January and February of 2010 would be preferable to increasing the risk of billing errors during the impending CIS cutover.

Pursuant to the Board's *Practice Direction on Cost Awards*, IGUA is eligible to apply for a cost award as a party primarily representing the direct interests of ratepayers in relation to regulated gas services. IGUA requests that the Board award to it the costs reasonably incurred in review of, and brief comment on, EGD's request.

Sincerely,
MACLEOD DIXON LLP



Ian A. Mondrow

c. Murray Newton, IGUA
David Stevens, AIRD & BERLIS, Counsel for EGD
Norm Ryckman, EGD
Intervenors of Record

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