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**APPRO**

ASSOCIATION OF  
POWER PRODUCERS  
OF ONTARIO

September 18, 2009

BY E-FILING

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
27th Floor  
2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli:

**Re: Union Gas Limited 2010 Rates Application; Board File Number EB-2009-0275**

I am writing on behalf of the Association of Power Producers of Ontario ("APPRO") to request intervenor status in the above noted proceeding and a determination from the Board that APPRO is eligible for its costs, pursuant to the Board's Practice Direction on Cost Awards.

As is well-known to the Board, APPRO is a non-profit association that represents the interests of Ontario electricity generators in a number of settings, including regulatory proceedings. APPRO members represent more than 95% of Ontario's generating capacity and are active in every generation technology: gas, wind, cogeneration, district heat and power, nuclear, hydroelectric, coal, solar, geothermal, energy from waste and fuel cells. APPRO's gas-fired generator members are major customers of the gas utilities and are directly affected by the availability of appropriate gas services and the rates that are charged for those services.

APPRO has actively participated in a number of Ontario Energy Board gas-related Proceedings including:

- (a) Natural Gas Electricity Interface Review (NGEIR) (EB-2005-0551),
- (b) Incentive Regulation Framework for Natural Gas Utilities (EB-2007-0606/0615),
- (c) Natural Gas Storage Allocation Policies process (EB-2007-0724/0725), and
- (d) the Storage and Transportation Access Rule (STAR) (EB-2008-0052).

We believe that APPRO's participation in the above has been responsible, and has brought significant specific customer and public interest value to the Board in its deliberations.

The Board has asked for opinions on whether the Hearing proceeding should be by way of a Written or Oral proceeding. APPrO's view is that in the interests of time, cost, and effort it could support a written process rather than have an oral hearing.

It would be appreciated if all notices with respect to the proceeding, and copies of all submissions, be delivered to the writer:

David Butters  
President  
APPrO  
25 Adelaide St. East, Suite 1602  
Toronto, ON M5C 3A1  
Phone: 416 322-6549 ext 231  
Fax: 416 481-5785  
E-mail: [david.butters@appro.org](mailto:david.butters@appro.org)

In addition, copies of all materials should be sent to:

Mr. John Wolnik  
c/o Elenchus Research Associates Inc.  
34 King St. East, 6th Floor  
Toronto, ON M5C 2X8  
Tel/Fax: 519-474-0844  
Cell: 519-873-0685  
E-mail: [JWolnik@ERA-INC.CA](mailto:JWolnik@ERA-INC.CA)

and

Mr. Richard J. King  
Ogilvy Renault  
Suite 3800, P.O. Box 84  
Royal Bank Plaza, South Tower  
200 Bay Street  
Toronto, Ontario M5J 2Z4  
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[rking@ogilvyrenault.com](mailto:rking@ogilvyrenault.com)

Respectfully,

A handwritten signature in black ink, appearing to be 'David Butters', written over a faint, large oval shape.

David Butters  
President & CEO