



**uniongas**  
A Spectra Energy Company

October 20, 2009

Ontario Energy Board  
2300 Yonge Street  
Suite 2700  
Toronto, Ontario  
M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Re: Union Gas Comments on the Board's Proposed Amendment to the Natural Gas Reporting and Record Keeping Requirements (RRR) Rule for Gas Utilities – EB-2009-0162

Dear Ms. Walli:

The Ontario Energy Board (“the Board”) issued a Notice of Proposed Amendment to a Rule – the Natural Gas Reporting and Record Keeping Requirements (RRR) Rule for Gas Utilities (the “Amendment”) on September 21, 2009. The Board invited all interested parties to provide written comments on the Amendment by October 19, 2009.

Union has reviewed the Amendment and has provided its comments, where applicable, on each section below.

#### **Section 2.1.14**

Proposed Amendment – Add the following new provision immediately after section 2.1.13:

*“2.1.14 A utility shall provide in the form and manner required by the Board, quarterly, by the last day of the second month following the quarter end for the first three quarters and the last day of the fourth month following the quarter end for the last quarter, the following information with respect to gas quantities, expressed in million cubic meters:*

- (a) Quantity of gas purchased by the utility for sales service customers in the quarter and year to date*
- (b) Quantity of gas supplied for the account of direct purchase customers (direct purchase) in the quarter and year to date*
- (c) Quantity of gas sold to sales service customers in the quarter and year to date, broken down by month, by residential class and the aggregate of all non-residential rate classes. The reported quantity will contain a billed quantity of gas (based on meter read) and an unbilled quantity (estimate).*

- (d) *Quantity of gas sold to direct purchase customers in the quarter and year to date, broken down by month, by residential class and the aggregate of all non-residential rate classes. The reported quantity will contain a billed quantity of gas (based on meter read) and an unbilled quantity (estimate).*
- (e) *Unaccounted for gas for the quarter (optional) and year to date (reported annually)*
- (f) *Change in the level of inventory held for the account of sales service customers during the quarter and year to date*
- (g) *Change in the level of inventory held for the account of direct purchase customers during the quarter and year to date”*

### Union’s Comments

**2.1.14 (c) and (d)** – Union suggests that the proposed wording in Section 2.1.14 (c) and (d) be changed to:

- (c) Quantity of gas **consumed by** sales service customers in the quarter and year to date, broken down by month, by residential class and the aggregate of all non-residential rate classes. The reported quantity will contain a billed quantity of gas (based on meter read) and an unbilled quantity (estimate).
- (d) Quantity of gas **consumed by** direct purchase customers in the quarter and year to date, broken down by month, by residential class and the aggregate of all non-residential rate classes. The reported quantity will contain a billed quantity of gas (based on meter read) and an unbilled quantity (estimate).

The wording above more accurately describes the relationship between Union and its customers with respect to gas supply. Union does not sell gas to direct purchase customers. By definition, direct purchase customers purchase gas through a third party, not Union.

**2.1.14 (f)** – Union understands the definition of the “change in the level of inventory held for the account of sales service customers” to be the following:

The change in the level of inventory held for the account of sales service customers (f) is equal to the quantity of gas purchased by the utility for sales service customers in a given period (a), less the quantity of gas consumed by sales service customers in the same period (c).

**2.1.14 (g)** – Union understands the definition of the “change in the level of inventory held for the account of direct purchase customers” to be the following:

The change in the level of inventory held for the account of direct purchase customers (g) is equal to the quantity of gas supplied for the account of direct purchase customers in a given period (b), less the quantity of gas consumed by direct purchase customers in the same period (d).

Timing

It is Union's understanding that the first reporting required under the amended RRR as proposed will be for Q1 2010, due May 30, 2010.

If you have any questions regarding Union's comments, please contact me at (519) 436-5476.

Yours truly,

[Original Signed by]

Chris Ripley  
Manager, Regulatory Applications