

November 11, 2009

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

Attention: Ms. Kirsten Walli, Board Secretary

**Re:** EB-2009-0354 – Union's Reply Submission

Dear Ms. Walli:

On September 24, 2009, Union filed an application with the Board requesting a deferral account to record the one-time administrative costs Union will incur to convert accounting policies and processes from Canadian Generally Accepted Accounting Principles ("CGAPP") to International Financial Reporting Standards ("IFRS").

Union received submissions from Board Staff, the Canadian Manufacturers & Exporters and Energy Probe. The submissions supported Union's application.

Accordingly, Union requests that the Board approve the draft accounting order establishing a deferral account to record the incremental one-time administrative costs related to the transition to IFRS. Union is not seeking any determination of the potential disposition of these costs at this time.

Yours truly,

*[original signed by]*

Chris Ripley  
Manager, Regulatory Applications

cc: Neil McKay (OEB)  
Bill Cowan (OEB)  
Michael Penny (Torys)  
All Intervenors of Record