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File No. A107059

November 21, 2007

VIA EMAIL

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, Ontario M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Natural Gas Storage Allocation Policies
NGEIR Implementation - Notice of Proceeding
Enbridge Gas Distribution Inc. and Union Gas Limited
Board File No. EB-2007-0724 and EB-2007-0725**

We are counsel to BP Canada Energy Company ("BP Canada") in these proceedings. An affiliate of BP Canada is a T-1 Customer of Union Gas Limited ("Union") and thus has an interest in the relief sought by the Industrial Gas Users Association ("IGUA") set out in its counsel's letter of November 15, 2007.

BP Canada concurs with Union's statements contained in its responses to Exhibits A2.2 and A2.9 concerning the commercial sensitivity of the information sought in those Interrogatories. In addition, BP Canada shares the concern therein expressed about identification of customers and their specific parameters.

Accordingly, in BP Canada's view, the Board should not permit or order the disclosure of the Confidential Information (as defined in the Board's letter of November 19, 2007).

If the board is inclined to grant the relief requested by IGUA, in whole or in part then, in BP Canada's view, it should only do so on the following conditions:

1. disclosure should be on a no-names, random basis (as per Ex. A2.2 and A2.9);

2. access to the Confidential Information should be restricted to those parties who can make the case that they are unable to properly advance their position in these proceedings without the Confidential Information;
3. access to the Confidential Information be restricted to counsel and any expert consultant retained to assist counsel;
4. IGUA (and any other party to whom access is allowed) be directed to make no efforts to determine the identity of any customer, through analysis of the Confidential Information and any other information, whether generally known or otherwise;
5. except as may be varied above, provision of and access to the Confidential Information, and the use and destruction or return thereof, be governed by the Board's Practice Direction on Confidential Filings.

Yours truly,

GOWLING LAFLEUR HENDERSON LLP



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