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February 19, 2008

BY EMAIL & COURIER

Ms. Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge St, Suite 2701 Toronto ON M4P 1E4

Dear Ms. Walli:

Board File No. EB-2007-0606 Union Gas Limited – 2008 Rates Application Argument of Energy Probe

Pursuant to Procedural Order No. 18, issued February 6, 2008, please find 11 hard copies of the Argument of Energy Probe Research Foundation (Energy Probe) in respect of commodity risk management (Issue 14.1). An electronic version of this communication will be forwarded in PDF format.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh

Case Manager

cc: Mike Packer, Union Gas Limited (By email)

Michael A. Penny, Torys LLP (By email) Crawford G. Smith, Torys LLP (By email)