

PUBLIC INTEREST ADVOCACY CENTRE LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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February 19, 2008

VIA EMAIL and COURIER

Ms. Kirsten Walli Board Secretary Ontario Energy Board P.O. Box 2319 26th Floor 2300 Yonge Street Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: Union Gas / Enbridge Gas Distribution Inc. - Incentive Rate Regulation for Natural Gas Utilities B-2007-0606 / EB-2007-0615

Submissions re: Risk Management Program-Union Gas Limited

With respect to the outstanding issue of Union's Risk Management Program, please be advised that VECC supports the continuation of Union's Risk Management as a valuable customer protection mechanism with respect to managing the volatility of the natural gas prices that system gas customers pay. VECC has reviewed and supports Union's evidence and argument with respect to this issue.

Yours truly,

Michael Buonaguro Counsel for VECC