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via RESS and courier

December 12, 2011
Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

**Re: EB-2011-0242 and EB-2011-0283
Enbridge Gas Distribution Inc. and Union Gas Limited Biomethane Application
Comments on Draft Issues List**

Shell Energy North America (Canada) Inc. (“Shell Energy”) submits these comments on the Draft Issues List provided by the Ontario Energy Board (“the Board”) in Procedural Order Number One dated December 5, 2011.

The Draft Issues List generally coincides with the key components of the program proposed by the utilities on pages 1 and 2 of their common evidence. However, the questions asked by the Board regarding the “pricing framework” fail to specifically include elements within the proposal that influence the pricing framework as well as other components. The utilities are proposing to purchase biomethane from only Ontario based producers, to “support the development of the RNG market”. Shell Energy seeks confirmation from the Board that these elements of the proposal are contained within the scope of draft issues related to the pricing framework, or alternatively, the inclusion of these as additional issues, for example:

“Is the proposal to purchase only Ontario produced supply reasonable and appropriate?”; and,
“Does the proposal foster or improve the RNG market?”

Shell Energy appreciates the opportunity to submit these comments,

Sincerely,

original signed

Paul Kerr
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