



uniongas

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December 22, 2011

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: EB-2011-0283 – Union Gas Limited – Renewable Natural Gas Program
Application – Response to Comments on Draft Issues List**

Union Gas Limited (“Union”) has reviewed the comments filed by Intervenor regarding the Draft Issues List included as Appendix B of Procedural Order No. 1 issued by the Board on December 5, 2011 in the matter of EB-2011-0242/EB-2011-0283.

This letter responds to those of the intervenors’ comments on the Draft Issues List that are not directly addressed by the Board’s Procedural Order No. 2.

Subject to the exception below, Union remains of the view that the Draft Issues List adequately frames the issues raised by the application. Union takes the position that, to the extent that they are relevant, some of the intervenors’ proposed additions to the Draft Issues List are not new issues, but rather questions relevant to issues already listed.

Union takes the position that VECC’s proposed issue 5.1 should be included in the Issues List, but considers proposed issues 5.2-5.4 to be questions arising from the issue identified in 5.1. As such, proposed issues 5.2-5.4 do not need to be included in the Issues List.

Union does not agree with VECC’s suggestion that the term “breakpoint” in Issue 2.2 be replaced by “break-even point”. Union’s view is that this substitution would be erroneous and confusing.

Yours truly,

[Original signed by]

Karen Hockin
Manager, Regulatory Initiatives

KH/ag

c.c.: Alex Smith, Torys
Mark Kitchen, Union
Intervenors of Record (EB-2011-0283)