

January 10<sup>th</sup>, 2012

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

***Via RESS, Electronic Mail and Courier***

Dear Ms. Walli:

**Re: EB-2011-0242 and EB-2011-0283, Renewable Natural Gas ("RNG") Program Application**

Just Energy Ontario L.P. ("Just Energy") respectfully submits the following comments in response to Procedural Order No. 2 issued December 19<sup>th</sup>, 2011 for the above referenced application before the Ontario Energy Board ("OEB" or "the Board") as submitted by Enbridge Gas Distribution Inc. ("EGD") and Union Gas Ltd. ("Union"), collectively referred to as "the Applicants", on September 30<sup>th</sup>, 2011.

Just Energy believes that the suggestion made in response to Procedural Order No.1 recommending the division of this application's proceeding into two phases is appropriate. Determining whether or not it is appropriate for the Board to consider this application could be considered a prerequisite to the Board's consideration of the application itself. The creation of an initial phase to consider this issue will foster efficiency and clarity by distinctly separating the question of appropriateness from the broader application.

Should you have any questions or comments in response to these comments please do not hesitate to contact Nola Ruzyski, Vice President Regulatory Affairs Canada, or Brandon Ott, Manager Regulatory Affairs Canada.

Yours truly,

A handwritten signature in black ink, appearing to read "N. Ruzyski".

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A handwritten signature in black ink, appearing to read "B. Ott".

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Intervenors