

## *Aiken & Associates*

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February 10, 2012

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

Dear Ms. Walli,

**RE: EB-2011-0038 - Comments of London Property Management Association on  
Draft Rate Order**

I have reviewed the draft rate order for this proceeding filed by Union Gas on February 2, 2012 on behalf of the London Property Management Association ("LPMA").

I believe the draft rate order accurately reflects the Board's January 20, 2012 Decision and Order, with the exception noted below. In particular, the decisions related to both the Long-Term Peak Storage Services Account (179-72) and the Unabsorbed Demand Cost Variance Account (179-108) appear to have been appropriated reflected in the draft rate order.

LPMA notes that Union has not agreed with the comments provided by CME dated January 27, 2012 from Mr. Thompson since no change to the sharing associated with account no. 179-70 appears to have been made. LPMA has reviewed the February 9, 2012 letter from Mr. DeRose on behalf of CME and supports the request that the Board invite submissions from parties on this issue and then determine whether or not the Board agrees that the ratepayers' share of the 20201 short-term storage revenues should be increased from \$0.657 million to \$0.831 million.

Yours very truly,

*Randy Aiken*

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c.c. Chris Ripley (Union Gas) (e-mail)  
Lawrie Gluck (OEB) (e-mail)