

March 15, 2012

By Email Only

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

Dear [Ms Walli],

Re: EB-2011-0210 – Union Gas Rebasing Application - APPrO Comments on the Draft Issues List

Further to Board Staff's letter of March 13, 2012 requesting any additional proposed issues be forwarded in advance of the Issues Conference on March 9, 2012, APPrO proposes that the following issues be added to the Issues List:

Should Union modify its rate design for large industrial customers (including gas-fired generation), to include an "opt-out" provision from its ratepayer funded DSM program? The Board has previously defined large industrial gas customers as customers in Rate 100 and T-1 (EB-2008-0346). Rate T-2 if approved, would be afforded similar treatment.

Should Union modify its rate design for contract rate classes other than Rate 100, in Union's Fort Frances, Western, Northern or Eastern Zones to offer an "opt-out" provision from its ratepayer funded DSM program for those industrial and power generation customers, that have a maximum daily requirement equal to or greater than the maximum daily requirement threshold for a Rate 100, but do not meet the other provisions under Rate 100?

Sincerely,

A handwritten signature in black ink, appearing to read "J Wolnik", with a stylized, flowing script.

John Wolnik
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