

July 26, 2012

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

## RE: EB-2010-0280 – Union Gas Limited Comments on the Ontario Energy Board Notice of Proposal to Amend a Rule - Eligible Low-Income Gas Customer Service Policy Amendments to the Gas Distribution Access Rule

Dear Ms. Walli:

On July 12, 2012 the Board released a Notice of Proposal to Amend to a Rule for eligible lowincome customer service policy amendments to the Gas Distribution Access Rule. The purpose of the proposed rule amendments is to ensure that rate-regulated natural gas distributors maintain appropriate customer service policy standards and practices for their low-income residential customers, and to ensure that they publish, and comply with, those standards and practices.

Union has reviewed the proposed amendments and will ensure that it will publish and comply with the proposed standards and practices. Union will implement the low-income customer service policy commitments by January 1, 2013. This includes updating the Customer Service Policy posted on the website and conducting business accordingly.

As stated in previous submissions, Union will track any costs incurred for system and process changes required to modify its customer service policies in the Gas Distribution Access Rule (GDAR) Costs deferral account for future disposition. Union will also be monitoring potential ongoing operational and lost revenue impacts and if evident, Union will request recovery through the GDAR Costs deferral account.

If you have any questions, please contact me at 519-436-4521.

Yours truly,

[original signed by]

Marian Redford Manager, Regulatory Initiatives

cc: Crawford Smith (Torys) EB-2010-0280 Intervenors