



**uniongas**

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November 21, 2012

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge St., 27<sup>th</sup> Floor  
Toronto, ON  
M4P 1E4

Dear Ms. Walli:

**Re: EB-2011-0210 – Union Gas Limited - Draft Rate Order Submission**

The purpose of this letter is to request a one week extension to the filing date for Union's EB-2011-0210 draft Rate Order to allow sufficient time to incorporate into the 2013 draft Rate Order the impacts related to the January 1, 2013 Quarterly Rate Adjustment Mechanism ("QRAM") application.

On October 25, 2012 the Board issued its Decision in Union's 2013 rate proceeding (EB-2011-0210). In its Decision, the Board ordered Union to file a draft Rate Order within 42 days of the date of the Decision. Therefore, pursuant to the Board's decision, the draft Rate Order must be filed on or before December 6, 2012. The Board further ordered that, from the date of filing the draft Rate Order, intervenors would have up to 14 days to provide comments followed by a subsequent 14 days for Union to respond. Based on this timeline, Union will not be in a position to implement the Board's 2013 rate Decision for January 1, 2013.

December 6, 2012 is also the date on which Union must file its January 1, 2013 QRAM. The January 1, 2013 QRAM application will address cost of gas-related changes to Union's gas supply commodity, gas transportation, storage and delivery rates. Given that 2013 rates will not be approved by December 6, 2012, the January 1, 2013 QRAM application will not incorporate the Board's decision in Union's 2013 rate proceeding. The rates approved as part of the January 1, 2013 QRAM will be in effect until superseded by the 2013 Rate Order.

To allow Union time to incorporate the January 1, 2013 QRAM application into the 2013 draft Rate Order, Union proposes to file its 2013 draft Rate Order on December 13, 2012. This will ensure that the draft Rate Order, when implemented, includes the cost of gas-related changes to gas supply commodity, gas transportation, storage and delivery rates per the January 1, 2013 QRAM, which the draft rate order will supersede. Union proposes that the Board maintain the intervenor comment period and the time allowed for

Union to respond, per the EB-2011-0210 Decision, at 14 days. Union commits to file reply comments, if any, as soon as possible to expedite the Rate Order approval.

If you have any questions please contact me.

Yours Truly,

*[original signed by]*

Chris Ripley  
Manager, Regulatory Applications

CC: EB-2011-0210 Intervenors  
Crawford Smith, Torys