

December 28, 2012

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

Dear Ms. Walli:

RE: EB-2011-0210 (Union Gas 2013 Rates) - LPMA Comments on Draft Rate Order

On behalf of the London Property Management Association ("LPMA"), I have reviewed the Draft Rate Order ("DRO") provided by Union Gas ("Union") on December 13, 2012, along with the updated version provided on December 20, 2012. The updated version included second pages to both Schedules 42 and 44 to provide further details that I had requested Union to provide upon review of the original DRO. I appreciate the quick response from Union in providing the requested additional information.

I have focused my review on the calculation of the overall revenue requirement and the allocation of this revenue requirement to the various rate classes. I have not done a detailed review of the proposed rate schedules to ensure that the appropriate wording changes and rates have been reflected. I have assumed that Board Staff will be doing so.

Based on the updated DRO, including the noted additions to Schedules 42 and 44, I believe that Union has appropriately and adequately reflected both the Board's Decision and Order dated October 25, 2012 and the revised Settlement Agreement as filed on July 24, 2012 and approved by the Board on July 25, 2012, with one minor exception noted below.

At the top of page 2 of the DRO Union states that "*All other rate classes will be billed effective January 1, 2012 and no rate adjustment is required.*" I believe that the referenced date should be January 1, 2013.

Sincerely,

Randy Aiken

Randy Aiken
Aiken & Associates

Encl.

cc: Chris Ripley, Union Gas Limited (e-mail)