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December 11, 2013

Via RESS and Courier

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

Dear Ms. Walli:

**RE:** Union Gas Limited

2014 Rates Application

Ontario Energy Board File Number: EB-2013-0365

Letter of Intervention - Ontario Association of Physical Plant Administrators (OAPPA)

Aegent Energy Advisors Inc. has been retained by the Ontario Association of Physical Plant Administrators to assist the association on matters related to the above-noted application. Aegent is submitting this letter of intervention on behalf of OAPPA.

OAPPA is requesting status as an intervenor in the EB-2013-0365 proceeding and provides the following information:

- 1. OAPPA is a not-for-profit organization whose membership includes the physical plant administrators for provincially-assisted universities in Ontario, a number of whom are distribution customers of Union Gas. As a result, certain OAPPA member universities will be directly affected by the outcome of this proceeding. Therefore, Union's application for 2014 rates is of direct interest to OAPPA.
- 2. OAPPA participated in the process that resulted in the settlement agreement setting out Union's 2014-2018 Incentive Rate Mechanism that was approved by the Board in EB-2013-0202 and that forms the basis for the 2014 rates application.
- 3. Union's proposal regarding the Parkway delivery obligation is of direct interest to several of the OAPPA member universities.
- 4. OAPPA seeks a determination that it is eligible for an award of costs. With respect to the cost eligibility criteria set out in section 3.03 of the Ontario Energy Board's Practice Direction on Cost Awards, in particular criterion (a), OAPPA represents the direct interests of certain ratepayers (institutional energy consumers) in relation to regulated services. Please note that in the past, OAPPA has been determined to be eligible for cost awards.

5. OAPPA requests that all correspondence and documents be directed to:

Valerie Young Director, Research and Analysis Aegent Energy Advisors Inc. 10 Four Seasons Place Suite 210 Toronto, Ontario M9B 6H7

Telephone: 416.622.9449, x104 Fax: 416.622.9797 E-mail: vyoung@aegent.ca

A copy of this letter is being delivered to Union Gas as indicated below.

Should you have any questions, please feel free to contact me.

Yours truly,

[Original signed by]

Valerie Young Director, Research and Analysis

cc. Chris Ripley, Union Gas (e-mail)
Crawford Smith, Torys (e-mail)
Hugh Briggs, OAPPA / Lakehead University (e-mail)