

April 24, 2014

VIA EMAIL

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

Dear Ms. Walli:

RE: Enbridge Gas Distribution Inc. 2014 to 2018 Rates Application - EB-2014-0039

Just Energy Ontario L.P. ("Just Energy") respectfully submits the following with respect to the above noted proceeding. Just Energy strongly opposes any request for the consideration of rate mitigation measures to smooth the impact of the increase in the commodity price. System supply rates are intended to be a variable "flow through" market based rates, which reflects current market conditions and moves in step with the market, using an established and fair mechanism.

Gas cost recovery rates must be reflective of market conditions or the correct price signal will be missed by consumers. An efficient energy market relies on price transparency which is lost when intervention to suppress the inherent volatility occurs.

It is important that consumers are made aware of the volatility inherent in the natural gas market. It is equally important that consumers are aware that the rates provided by Enbridge are a fair representation of actual market conditions. Maintenance of these signals ensures that consumers can make informed decisions about rate alternatives.

Any proposal of an interim fix completely undermines the ability for gas marketers to compete. This proposal also goes against the well-established and approved rate setting mechanism/methodology.

In light of the above, Just Energy request that the Board end the consideration of additional measures to smooth the bill impact with respect to all components of the Quarterly Rate Adjustment Mechanism ("QRAM") and not deviate from the well-established standard methodology approved by the Board.

Just Energy contends that approval of the above would send the wrong message to consumers, cause rate confusion and would provide consumers with inaccurate current pricing information for a significant period of time. This in turn would lead consumers to make decisions on alternative rate options in the market based on misinformation.

For the benefit of natural gas consumers and natural gas marketers active in the Choice Program, Just Energy respectfully requests that the Board reject any efforts to further smooth volatility.

Should you have any questions, please do not hesitate to contact me at 403.462.4299.



ENERGY MADE EASY

Sincerely,

A handwritten signature in black ink, appearing to read "Nola Ruzycki".

Nola Ruzycki
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