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By electronic filing

September 16, 2014

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

Dear Ms. Walli,

Union Gas Limited ("Union") – October 1, 2014 QRAM Application

Board File No.: EB-2014-0208

Our File No.: 339583-000019

I am writing on behalf of Canadian Manufacturers & Exporters ("CME"). Please consider this correspondence as CME's written comments on Union's QRAM Application, which seeks changes to Union's gas supply and transportation rates effective October 1, 2014. As the Board is aware, it is CME's practice to conduct a duly diligence of Union's QRAM Applications. We have done so in this case.

We have had the benefit of reviewing the questions submitted by Board Staff on September 15, 2014. We have the following additional questions which we require Union to answer before we can support the Application:

- (a) Board Staff has asked Union to advise whether the costs associated with the use of integrity space have been allocated to sales service customers. If they have not been allocated entirely to sales service customers, then please provide details of the direct purchaser customers to whom these costs have been allocated, as well as the basis for such an allocation; and
- (b) Please advise whether Union's utilization of 0.6 PJs of integrity space through the end of March 2014 is directly or indirectly related to the spot gas purchases which are currently being reviewed by the Board in Union's 2013 Deferral Accounts proceeding, being EB-2014-0145.

We request an opportunity to provide further comments upon receiving the answers to these questions.

CME requests an award of its reasonably incurred costs in connection with conducting its examination of Union's QRAM Application.

Yours very truly,



Vincent J. DeRose

c. Chris Ripley (Union)
Crawford Smith (Torys)
All Interested Parties EB-2013-0365/EB-2008-0106
Paul Clipsham and Ian Shaw (CME)
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