

September 23, 2014

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

Dear Ms Walli:

Re: EB-2014-0012 – Union Gas Limited – Hagar Liquefaction Service Rate

We are legal counsel to Union Gas Limited. This letter is in response to correspondence dated September 18, 2014 filed by Goodmans LLP, legal counsel to Northeast Midstream LP ("Northeast").

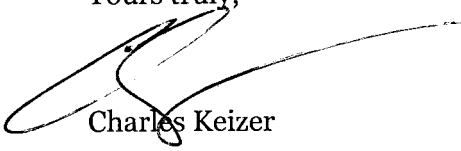
In the Northeast correspondence, Northeast advises the Board that it intends to file a motion under section 29(1) and Northeast further requests that the motion be scheduled at the outset of the hearing and that the schedule be amended accordingly. Northeast further advises that it will not file its motion until October 15, 2014.

While Union believes that a motion under Section 29(1) is ill-founded and Union reserves its rights to make submissions in this regard, Northeast's motion should not be permitted to delay the commencement of the proceeding.

Northeast indicates that it will not file its motion until October 15, 2014, which is almost a month from the date of its September 18 letter. No explanation was given as to why this length of time was required to bring this motion or why a motion could not be brought earlier. The delay in Northeast's ability to bring a motion should not provide a basis for the delay in commencement and completion of the hearing of Union's application or be to Union's prejudice.

Union submits that in order to avoid undue prejudice to Union, any order made by the Board in respect to hearing the motion and schedule should: (1) establish the hearing of the matter by way of writing; (2) set a filing date well in advance of October 15, 2014; (3) require Northeast to file a motion record together with its factum; and (4) provide for sufficient time for Union's reply.

Yours truly,



Charles Keizer

CK/dh

cc: EB-2014-0012 intervenors
David E. Lederman (Goodmans LLP)
Karen Hockin (Union Gas)
Michael Millar (Legal Counsel, OEB)

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