

June 22, 2015

VIA RESS AND COURIER

Ms. Kirsten Walli
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File No. T1002922

Dear Ms. Walli:

Re: EB-2015-0120 – Union Gas Limited (Union) Sudbury Expansion Project.

Final Submissions of Industrial Gas Users Association (IGUA).

Pursuant to Procedural Order No. 2, herein, through this letter IGUA provides brief final submissions in respect of Union's Sudbury Expansion Project leave to construct application.

IGUA supports Union's application, and urges Union to proceed with the proposed expansion expeditiously.

In fact, IGUA made a decision not to file evidence and/or pursue examination of witnesses from Union in this proceeding specifically because IGUA did not wish to delay Union's execution of the current Sudbury expansion project. This decision was made despite concerns of IGUA members in the area regarding Union's lack of proaction in planning for Sudbury system expansion.¹

Union's interrogatory responses² herein indicate that while Union is "*aware of other potential industrial projects that could lead to further expansion of the Sudbury system*" and "*with appropriate agreements in place, Union would commence planning and construction of the required facilities*", at this point "*no future growth from other industrial customers has been incorporated into this filing*".

Union does acknowledge that it is "*working with a group of IGUA members*" to obtain information required to complete evaluation of a further expansion of the Sudbury

¹ See our letter requesting intervention on behalf of IGUA dated April 20, 2015.

² Board Staff.2, page 2.

system.³ IGUA members in the Sudbury area have in fact been pursuing discussions with Union for some time regarding their desire for more distribution service capacity. Progress has been lamentably slow.

During this past winter customers on the Sudbury system were faced with a 120 hour service interruption⁴. Union requested its large customers in the area to reduce their consumption to their firm contract levels. IGUA's members understand that Union had significant concerns during this period for loss of service to its residential and commercial customers in the area. At least one IGUA member responded to this concern by switching its fuel source to (more expensive) oil.

IGUA members have been advised by Union that the currently proposed Sudbury expansion could provide some additional capacity beyond that required by the Victoria Mine. IGUA members thus made the determination not to lead evidence or seek to examine Union witnesses in this proceeding, so that the expansion could be completed as expeditiously as possible.

While Union's interrogatory responses take the position that contracts are required prior to proceeding with the planning work for further expansion of the Sudbury system⁵, it is also clear that the Victoria Mine has not yet signed such a contract⁶. Union is nonetheless diligently pursuing the current expansion in order to serve this customer. IGUA members in the area have been requesting for some time that Union provide them with the costs associated with additional distribution capacity, and are fully prepared to commit to taking further capacity.

IGUA members in the area have been advised by Union that an application in respect of a further expansion of the Sudbury system could be filed as early as this fall. IGUA strongly encourages Union to do so.

Yours truly,



Ian A. Mondrow

c: M. Murray (Union)
S. Rahbar (IGUA)
C. Schuch (Board Staff)
Intervenors of Record

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³ Board Staff.2, page 2.

⁴ IGUA.2, part (a).

⁵ IGUA.2, part (c).

⁶ Board Staff.5.