

EMMA BLANCHARD
T 613.369.4755
eblanchard@blg.com

Borden Ladner Gervais LLP
World Exchange Plaza
100 Queen St, Suite 1300
Ottawa, ON, Canada K1P 1J9
T 613.237.5160
F 613.230.8842
blg.com



Our Files # 339583-7 and -19

By electronic filing

September 15, 2015

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

Dear Ms. Walli

Re:	Enbridge Gas Distribution Inc. ("EGD") October 1, 2015 QRAM Application	Union Gas Limited ("Union") October 1, 2015 QRAM Application
Board File #:	EB-2015-0242	EB-2015-0255

On behalf of Canadian Manufacturers & Exporters ("CME"), we have conducted a due diligence review of each of the recent QRAM Applications made by EGD and Union.

While each of the Applications appears to be in accordance with the Board approved QRAM mechanism, we are puzzled as to why EGD's gas costs forecasts are increasing for the last quarter of 2015, whereas Union's are decreasing.

The evidence indicates that EGD is forecasting an increase in its Utility Price from \$5.200/GJ to \$5.252/GJ. The EGD Alberta border reference price forecast embedded in current rates of \$3.0200/GJ is increasing to \$3.0362/GJ (EB-2015-09-10, Exhibit Q4-2, Tab 1, Schedule 1, pg.1).

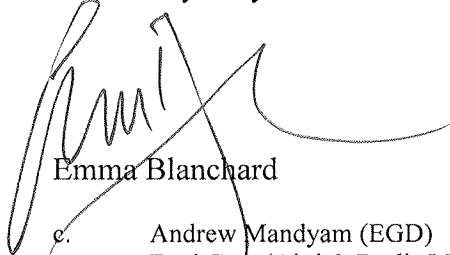
Union's evidence indicates that it is forecasting a decrease in its Ontario Landed Reference Price from \$5.147/GJ to \$5.140/GJ. Union's Alberta border reference price forecast embedded in current rates is \$3.056/GJ which will be increasing to \$3.066/GJ under the rates proposed for the 4th quarter of 2015. (EB-2015-0255, October 1, 2015 QRAM Application, Tab 1, pg. 2-3)

We note that Board Staff has asked both EGD and Union for further information with respect to changes to TransCanada Mainline tolls implemented on July 1, 2015. We respectfully request that each utility supplement its response to the questions posed by Board Staff with an explanation of the difference between EGD and Union's Alberta border reference prices as well as the causes for the directionally different Ontario gas costs outcomes for EGD and Union when applying the Board approved QRAM methodology for the purposes of determining rates effective October 1, 2015.

We would like to better understand why a Board approved methodology has produced directionally different Ontario gas costs outcomes for similar utilities.

CME also requests an award of its reasonably incurred costs in connection with conducting its examination of each of these Applications.

Yours very truly



Emma Blanchard

- e. Andrew Mandyam (EGD)
- Fred Cass (Aird & Berlis LLP)
- All Interested Parties EB-2014-0276
- Chris Ripley (Union)
- Crawford Smith (Torys)
- All Interested Parties EB-2014-0271/EB-2008-010
- Paul Clipsham and Ian Shaw (CME)

OTT01: 7210537: v2