

Reply to the Attention of Direct Line Email Address Our File No.

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le No. 231915
Date December 7, 2015

RESS AND DELIVERED BY COURIER

Ontario Energy Board 2300 Yonge Street, 27th Floor Toronto, ON M4P 1E4

Attention: Kristen Walli

Board Secretary

boardsec@ontarioenergyboard.ca

Dear Ms. Walli:

Re: EB-2015-0179

Union Gas Limited Application for Community Expansion Project Notice of Canadian Propane Association under Procedural Order No. 2 dated November 30, 2015

Further to Procedural Order No. 2, the Intervenor Canadian Propane Association ("CPA") intends to file evidence concerning the funding of the proposed expansions. In particular, CPA intends to file evidence on the following issues:

- 1. The accuracy and appropriateness of the data, calculations, assumptions, source documents, survey design, survey results, and other figures that are presented in Union's application and evidence;
- 2. The appropriateness of the profitability index proposed by Union;
- 3. The cost of propane for residential and commercial purposes;
- 4. Connection and conversion costs:
- 5. The economic harm to propane users, and members of the propane industry, and associated industries of the expansions and its impact on Union's funding proposal;
- 6. The funding forecasts and actual results for the natural gas expansion to Red Lake, Ontario, the only community in Ontario requiring OEB facilities approval to date;



- 7. The funding forecasts and actual results for the natural gas expansions into rural and remote communities in New Brunswick and Maine, USA; and
- 8. The harm to new municipalities and existing customers, and the absence of any harm to Union shareholders, that will result if Union's forecasts are inaccurate.
- 9. Government policy on natural gas expansion;
- 10. Historic policies of the Ontario Energy Board and other utility regulators related to utility expansion; and
- 11. Any other evidence necessitated by Union's responses to interrogatories.

Yours truly,

Laura Brazil

cc by email: Chris Ripley (Union) | Charles Keizer (Torys)

Mike Richmond (McMillan LLP)