

December 14, 2015

VIA RESS AND COURIER

Ms. Kirsten Walli
ONTARIO ENERGY BOARD
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

Ian A. Mondrow
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Assistant: Cathy Galler
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Re: EB-2015-0340: Union Gas Limited (Union) January 1, 2016 QRAM Application.
Industrial Gas Users Association (IGUA) Comments.

We write as legal counsel to IGUA.

IGUA's Position on Proposed Rate Adjustments

IGUA's advisors, Aegent Energy Advisors Inc. (Aegent), have reviewed Union's Application for quarterly adjustment of rates (QRAM) to be effective January 1, 2016. Based upon Aegent's advice, IGUA is satisfied that Union has properly followed the QRAM methodology approved by the OEB's EB-2008-0106 Decision.

In particular, IGUA understands that:

1. Union has included forecast transportation portfolio cost changes as of November 1, 2016 in November and December 2016 entries in the appropriate deferral accounts, pending the anticipated in-service date of November 1, 2016 of TransCanada transportation facilities on which such transportation portfolio changes are dependant.
2. Union's application reflects current TransCanada abandonment surcharges rather than the NEB-approved surcharges that will take effect on January 1, 2016. IGUA further understands that the new surcharges will be incorporated with Union's April 1, 2016 QRAM application, and that any differences that accrue between January and April 1st will be captured in the South PGVA and the North Transportation Tolls and Fuel deferral accounts for disposition as part of that April 1, 2016 QRAM application.

IGUA has no objection to approval of Union's application as filed.

Costs

Pursuant to the Board's *Practice Direction on Cost Awards*, IGUA is eligible to apply for a cost award as a party primarily representing the direct interests of ratepayers in relation to regulated gas services. IGUA requests that the Board award it costs reasonably incurred in review of Union's QRAM.

IGUA has, in the past, been consistently awarded modest costs for review of QRAM applications. IGUA respectfully submits that the Board, in making such awards, has recognized some value (commensurate with modest costs) in the independent and informed review of such applications.

IGUA continues to be mindful of the need for efficiency in its regulatory interventions, in particular in respect of relatively non-contentious matters such as has historically been the case with QRAM applications. For QRAM reviews, IGUA has retained Aagent, whose professionals are expert in Ontario gas commercial and regulatory matters, including rate matters in particular. Aagent conducts a review of the QRAM application as filed, and provides a report to IGUA. Provided that Aagent's report does not indicate any concerns with either the application of the QRAM protocols or the rate outcome, IGUA is in a position to advise the Board that it has no cause for objection, as is the case with the instant Application.

IGUA submits that it has acted responsibly with a view to informing the Board's review and decision on this Application, while maintaining due attention to cost efficiency. On this basis, IGUA is requesting recovery of its costs for participation in this process.

Yours truly,



for: Ian A. Mondrow

cc. Dr. Shahrzad Rahbar (IGUA)
Valerie Young (Aagent)
Chris Ripley (Union)
Crawford Smith (Torys)
Intervenors of Record (EB-2015-0116)

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