

December 18, 2015

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
Suite 2700  
Toronto, Ontario, M4P 1E4

Dear Ms. Walli:

**Re: EB-2015-0238 - Distributor Gas Supply Planning Consultation - Comments of LPMA on the Draft Table of Contents**

As per the Board's letter of December 14, 2015, LPMA has reviewed the Draft Table of Contents and is providing the following comments on the draft.

LPMA believes that there should be a "stress test" added to the table of contents. While there are detailed gas supply planning inputs and gas supply planning outputs listed in the draft table, it is not apparent to LPMA that any sensitivity analysis around changes in economic and/or weather conditions is undertaken by Union and Enbridge, or if it is undertaken, what level of variation is considered by the distributors.

The underlying reason for the addition to the table of contents is that it is extremely relevant. The gas supply planning is based on a number of inputs, many of which are likely to vary from forecast during the course of a gas supply year. Many of the inputs are also fixed for the gas year, such as transportation and storage. Variations in demand due to weather, economic and/or reasons are likely to result in deviations from the gas supply plan. This has been evidenced over the last few winters, which have been much colder than normal and planned for.

LPMA believes that a key component of any review of gas supply planning is a review of what happens to those plans when things proceed differently than assumed. Do the distributors test their proposed plans to see what volatility can be handled within the plan, and to what extent is the level of volatility between the distributors different? LPMA also believes that gas supply planning goes beyond the actual plan and should incorporate what contingencies the distributors have in place or could put in place if the circumstances require deviation from their plans due to unforeseen circumstances.

LPMA believes that a "stress test" of the plans is, or should be, a key component of the plans and should also be a key component of the review of the plans. As a result LPMA submits that the stress test should be explicitly identified in the table of contents.

Sincerely,

***Randy Aiken***

Randy Aiken  
Aiken & Associates