

December 18, 2015

VIA E-MAIL, RESS & COURIER

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

Ian A. Mondrow
Direct: 416-369-4670
ian.mondrow@gowlings.com

Assistant: Cathy Galler
Direct: 416-369-4570
cathy.galler@gowlings.com

Dear Ms. Walli:

Re: EB-2015-0238 – Distributor Gas Supply Planning Consultation.

Industrial Gas Users Association (IGUA) Comments on *Draft Table of Contents*.

Further to the Board's December 14, 2015 letter to interested parties regarding the outcome of the recent (December 3rd) meeting of interested stakeholders in the captioned consultation, we write to provide IGUA's comments on the *Draft Table of Contents*. The finalized *Table of Contents* is to be used to structure an anticipated document to be developed by the utilities which will provide more information, including a "*side by side comparison*", of their respective approaches to gas supply planning.

In reference to the current draft contents, IGUA suggests the following:

1. Items 2a. and 2b. should be "promoted" to first level items (new items 3 and 4), such that:
 - (a) "Criteria", currently a subheading under "Guiding Principles", becomes a main heading, and is recast as "Planning Criteria".
 - (b) "Inherent Risks", currently a subheading under "Guiding Principles", becomes a main heading, and is recast as "Treatment of Risk".

We anticipate that these changes may better reflect the structure of the utilities' approaches to gas supply planning, recognizing that principles generally stand alone, and are translated into more detailed "criteria". Further, while principles may include comment on risk, the treatment of risk in gas supply planning merits its own discussion (beyond simply a high level statement in a criterion).

2. Item 4 should have added to it the words "*Influencing Gas Supply and How Addressed*", to focus the discussion regarding "Current and Future Trends" on if/how they are formally incorporated into current gas supply planning.
3. Perhaps the utilities could consider whether the addition to item 5 (Gas Supply Planning Inputs) of something like "system operation requirements" (i.e. delivery points, role of/utilization of storage and transmission assets) would be informative.
4. Item 9 (Review and Approval Process) could be moved ahead of item 8 (Execution of the plan), as a more logical sequencing for the discussion.

Yours truly,



for: Ian A. Mondrow

c: S. Rahbar (IGUA)
J. Craig (OEB Staff)

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