

March 7, 2016

Ms. Kirsten Walli  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON  
M4P 1E4

Dear Ms. Walli:

**Re: EB-2015-0276 - Union Gas Limited - 2014 Disposition of Demand Side Management  
Deferral and Variance Accounts - Submission on Information Filed Confidentially**

Union Gas Limited (“Union”) requested confidential treatment of the verification reports provided in Exhibit B, Tab 1, Appendices M and N in the above-noted proceeding. Appendix M is entitled “Engineering Review of 2014 Commercial/Industrial Custom Projects Review of Random Sample Files” prepared by Byron Landry (the “C/I Report”). Appendix N is entitled “2014 Verification of Large Custom Projects” prepared by Diamond Engineering Company (the “Diamond Report”). Customer-specific information and sensitive commercial information were redacted from these reports (collectively the “CPSV Reports”).

In Procedural Order No. 1 dated February 4, 2016 the Ontario Energy Board (the “Board”) directed Union to provide confidential, un-redacted versions of the CPSV Reports to parties that signed the Declaration and Undertaking form. Parties wishing to comment on whether the information filed confidentially should remain confidential or be placed on the public record of this proceeding were directed to file written submissions by February 22, 2016.

Union received two submissions on the information filed confidentially: one from the School Energy Coalition (“SEC”) on February 22, 2016 and one from the Industrial Gas Users Association (“IGUA”) on March 3, 2016. Neither intervenor opposes the redactions in the C/I Report. SEC’s and IGUA’s comments focus on the redactions in the Diamond Report and suggest that the publicly-filed version of it does not require such extensive redactions.

The CPSV Reports are shared confidentially with the members of the Audit Committee (the “AC”) through the audit process. The two previous times such reports were filed by Union with the Board they were redacted in a similar fashion. Union took this approach on all three occasions because of the small number of customers in the Large Volume rate classes and out of a concern that the data provided in several sections of the Diamond Report could allow individual customers to be easily identified. Further, these reports include proprietary information (production levels, hours of operation, etc.) used by these customers to gain a competitive advantage. It is for these reasons that Union redacted the project level descriptions in their entirety, consistent with previous years’ filings.

Union has considered SEC's and IGUA's submissions. IGUA, which represents certain large volume customers, acknowledges the need to protect the customer-specific information of large volume customers, but also calls for Union to parse the customer-specific information contained in the publicly filed redacted version of the Diamond Report. In light of the fact that IGUA represents certain large volume customers, and unless other intervenors that represent large volume customers who have undertaken or might undertake large volume DSM projects provide submissions to the contrary by March 10, 2016, Union will file a revised redacted version of the Diamond Report with the Board on March 11, 2016 that provides further detail on supporting calculations, but which still protects, albeit not as completely, the proprietary and potentially customer-identifying information in the Diamond Report.

If you have any questions concerning this submission please contact me at (519) 436-5334.

Yours truly,

*[Original Signed by]*

Vanessa Innis  
Manager, Regulatory Initiatives

cc: Alex Smith (Torys)  
EB-2015-0276 Intervenors