

March 8, 2016

COURIER

Kirsten Walli
Ontario Energy Board
2300 Yonge Street, 27th 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 – Additional IGUA Interrogatories on Appendix N – 2014 Verification of Large Custom Projects

Yesterday, in accordance with the schedule set out in Procedural Order No. 1 in this proceeding, Union filed its responses to the interrogatories of Board Staff and intervenors, including IGUA. (IGUA's interrogatories had been filed late on February 23rd but, in view of IGUA's very late intervention, Union did not object to IGUA's late filing of its interrogatories.)

Following the filing of its interrogatory responses, Union received "additional" interrogatories from IGUA's counsel. As IGUA's counsel acknowledged in his accompanying letter, these additional interrogatories were filed two weeks late and thirteen days after IGUA filed its initial interrogatories. Though the covering letter refers to correspondence on confidentiality issues, it offers no explanation for the fact that IGUA's additional interrogatories were filed late, indeed after Union had filed its interrogatory responses in accordance with the schedule set out in Procedural Order No. 1.

In Union's view the filing of additional interrogatories after Union had filed its interrogatory responses is contrary to the procedure established by Procedural Order No. 1. IGUA has not offered any explanation, let alone a justification, for this irregular step and has not sought permission from the Board to disregard Procedural Order No. 1. In the absence of a direction from the Board (which IGUA has not yet requested) authorizing the very late filing of its additional interrogatories, Union will not be responding to those interrogatories.

Yours truly,

(Original signed by)

Alex Smith

AS/af