

March 8, 2016

VIA RESS AND COURIER

Ms. Kirsten Walli
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File No. T1007912

Dear Ms. Walli:

Re: EB-2015-0276 – Union Gas Limited (Union) Application for 2014 Demand Side Management Clearance of Variance Accounts.

IGUA Response to Union re Information Filed Confidentially (Exhibit B, Tab 1, Appendix N – 2014 Verification of Large Custom Projects).

We are in receipt of Union's letter dated March 7th addressing IGUA's earlier submission on the appropriate scope of confidential treatment for the captioned exhibit (the Diamond Report).

Union has indicated that it intends to file a revised redacted version of the Diamond Report 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"*.

We wish to be clear, in light of Union's comments as noted above, that IGUA agrees with Union that protection of potentially customer-identifying information (in particular when combined with potentially proprietary information) is an important principle. A less redacted version of the Diamond Report should not compromise this principle. Review of this document should not consider more or less protection of customer identities. Rather it should more carefully parse information that would reveal a customer's identity from information that would not.

Our review of the Diamond Report indicates that most of the information contained in it would not reveal the customers' identities. In our March 3rd letter we provided a list of 13 specific passages from the Diamond Report which IGUA acknowledges could contain information that might betray the subject customers' identities. Our assessment is that redaction of these passages would be reasonable, and we expect that Union will maintain

redaction of the portions of these passages which could betray the subject customer's identity.

There may be additional passages which Union, given its knowledge of its customers and its service territory, determines could similarly contain information that might betray the customers' identities. As noted in our March 7th letter, we believe that Union is best placed to determine whether there are other such passages which contain information about the nature of the subject customer's business, location or facilities which could result in third party identification of the customer whose project is evaluated in the report. In such event, such further information should be redacted in the revised version of the document which Union will be publishing.

IGUA appreciates Union's openness to revisiting the appropriate scope of redaction of the Diamond Report in order to protect customer identities while respecting the principle that proceedings before the Board should be public and accessible, and that, subject to protection of customer identifying or otherwise sensitive information, relevant information should be disclosed and subject to critical review.

Yours truly,


Ian Mondrow

- c. V. Innis (Union)
- A. Smith (Torys LLP, Counsel for Union)
- S. Rahbar (IGUA)
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