

March 16, 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.

Appendix N – 2014 Verification of Large Custom Projects Report.

Following correspondence last week on behalf of IGUA and SEC, and in response to that correspondence, Union has filed a less redacted version of the captioned exhibit (the Diamond Report). In its covering letter for that filing, Union indicated that the basis for its remaining confidentiality claims in respect of the Diamond Report was “*competitively sensitive information*” and “*commercially sensitive customer information*”.

IGUA appreciates that Union’s stated intent is to protect the information of its customers. As previously stated, IGUA supports this objective. At the same time, a publicly accessible record regarding the veracity of the savings claimed for Union’s large volume customer DSM program is important to IGUA and its members.

In our letter of March 3, 2016, we included (pages 3-4) a list of Diamond Report references that we indicated could betray the customer’s identity, either through reference to the nature of the subject customer’s business activities or the nature of the subject customer’s gas related equipment and related infrastructure. We acknowledged that Union was best positioned to determine whether the references which we listed could allow identification of the particular customer if a reader was familiar with Union’s franchise and its large volume customers.

In our letter of March 8, 2016, we reiterated IGUA’s agreement with Union that information which could identify a particular customer is properly treated confidentially.

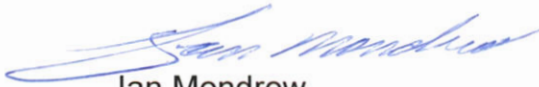
IGUA requests that Union consider the following in confirming whether further publication of information from the Diamond Report could be made without compromising the confidentiality of specific customer identity:

1. Listing of customer classification type (i.e. manufacturing or industrial) and customer rate class. Customers are divided among different large volume rate classes based on gas use requirements, which in turn is a relevant consideration when evaluating DSM programs and resulting gas savings claims in respect of each customer type/rate class. The Board itself has distinguished among rate classes in its DSM policies over the past several years. IGUA continues to believe such distinctions are extremely important in considering DSM programs, claimed gas savings and associated ratepayer costs.
2. Descriptions regarding customer maintenance or equipment survey practices, which would be relevant to considerations of free-ridership.
3. Sample results for defective equipment (i.e. number of steam traps leaking, and percentage of total steam load represented by the identified leaks), which would be relevant to considerations regarding the value of Union's DSM intervention in the context of the specific large volume customer.
4. Information related to the customer's use of the equipment subject to the DSM initiative, which could be relevant to free ridership and/or project design considerations.

Key from IGUA's perspective is the extent of redaction required to properly protect the subject customers from public identification, and thus the potential for competitors or others to link information regarding customer gas use or equipment to a specific customer. For example, were specific steam pressures may be revealing, then the numbers (but not the balance of the sentences) should be redacted. Where a particular make or type of equipment could be revealing, then the equipment make/type (but not the entire sentence or paragraph) should be redacted. Rate class or customer classification type (i.e. commercial vs. industrial) could likely be published without compromising the foregoing principles. The same would likely be true for customer maintenance practices or data collection protocols, providing that unique customer identifiers elsewhere in the subject summary sheet are kept confidential.

In addition, we await the Board's determination on our request that Union be directed to respond to IGUA's interrogatories on the Diamond Report already submitted (submitted off the public record on March 7, 2016, with our covering letter of that date publically filed).

Yours truly,



Ian Mondrow

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