

April 8, 2016

BY COURIER & RESS

Ms. Kirsten Walli Board Secretary
Ontario Energy Board Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Union Gas Limited ("Union")
Leamington Expansion Project
EB-2016-0013**

This letter is Union Gas Limited ("Union") response to Hydro One Network's Inc. ("Hydro One") letter of April 7, 2016.

It is Union's position that the hearing scheduled for April 12, 2016 should not be adjourned.

The appropriate time for Hydro One to have asked for leave to file evidence was when it intervened. The matters that Hydro One seeks to address have not changed since Union submitted its application and it is not appropriate for Hydro One to raise these matters at this late date. If Hydro One had concerns with any of the responses to Union's interrogatories it could have made these concerns known promptly, and not wait until after the Board had issued Procedural Order number 2.

Union's position is that both facilities can be constructed in their proposed location and that mitigation measures are available that allow both facilities to co-exist in their proposed location. This is permitted under the relevant CSA guidelines. As such, the technical teams of both utilities are working towards a technical solution, which may include mitigation measures such as the installation of copper wire adjacent to the pipeline, and additional grounding of above-grade facilities, which will allow for the safe construction and operation of both natural gas pipelines and hydro transmission lines.

To be clear Union's is not requesting that Hydro One move the location of its proposed facilities, rather that the two utilities continue to work together to develop mitigating measures to allow for the construction of infrastructure that is needed in the Municipality of Leamington.

Yours truly,

[original signed by]

W.T. (Bill) Wachsmuth, RPF
Senior Administrator, Regulatory Projects
:sb
Attach.

cc: L. Gluck, OEB
M. Millar, OEB
EB-2016-0013 Intervenors
Crawford Smith, Tory's