

April 12, 2016

**COURIER**

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

Dear Ms. Walli:

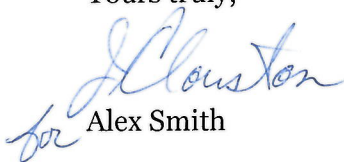
**Re: EB-2015-0276 - Union Gas Limited - 2014 Disposition of Demand Side Management Deferral and Variance Accounts – Redaction Issues 2014 Verification of Large Custom Projects**

After Procedural Order No. 2 in this proceeding was issued on March 21, 2016, Board Staff advised that it might be helpful to the Board if Union filed a further letter specifically addressing the letter from the Industrial Gas Users Association's ("IGUA") counsel dated March 16, 2016 and the supplementary interrogatories of the School Energy Coalition ("SEC") dated March 17, 2016 regarding redactions to the "2014 Verification of Large Custom Projects" prepared by Diamond Engineering Company (the "Diamond Report"). As the Board will be aware, Customer specific information and sensitive commercial information were redacted from these reports (collectively the "CPSV Reports").

This letter is Union's response to Board staff's request. In Union's view, the process that has developed on this issue—which involves IGUA and SEC seeking ever more granular refinements to the redactions of sensitive commercial information in the CPSV Reports—is causing undue delay in this proceeding and is establishing a poor precedent. Union used its judgment to protect sensitive commercial information for its customers in the redactions already provided. The Board's confidential process is available to parties to address the redacted sections of the CPSV Reports. IGUA's further request in its counsel's letter and SEC's requests at questions 12 and 15 would require Union to liaise directly with individual customers and, in effect, negotiate on IGUA and SEC's behalf over line-by-line changes to the redactions in the CPSV Reports dealing with individual customers' sensitive commercial information. This is not a proportional or appropriate approach to the redaction of sensitive commercial information when that very information is readily accessible to intervenors through the Board's confidential process, provided only that they undertake to safeguard any such information shared with them. While IGUA has accessed the unredacted CPSV Reports through this process, SEC has not.

Union also notes that it is not claiming any incentive related to the large volume scorecard and Union's total 2014 DSM activity LRAM claim for Rate T1, Rate T2 and Rate 100 is approximately \$42,000.

Yours truly,

  
for Alex Smith

AS/af