ONTARIO ENERGY BOARD

OEB STAFF SUBMISSION

Union Gas Limited

2017 Rates

EB-2016-0245

November 25, 2016

Background

Union Gas Limited (Union) filed an application on September 9, 2016 (updated October 7, 2016) with the Ontario Energy Board (OEB) pursuant to section 36 of the *Ontario Energy Board Act, 1998*, for an order or orders approving rates for the distribution, transmission and storage of natural gas, effective January 1, 2017.

In July 2013, Union filed an application requesting approval of a multi-year Incentive Ratemaking Framework (the IRM Framework) (EB-2013-0202). The application included a comprehensive settlement agreement between Union and stakeholders. On October 7, 2013, the OEB accepted the settlement agreement as filed.[1]

Union's current application for 2017 rates is based on the IRM Framework agreed to in the settlement agreement. Union's current application also includes proposals for: (a) the implementation of the Union North Cost Allocation and Rate Design; (b) the implementation of the Parkway Delivery Commitment Incentive; and (c) a new service for Rate T2 customers.

In Procedural Order No. 1, dated October 25, 2016, the OEB scheduled a settlement conference with the objective of reaching a settlement among the parties on the issues in the proceeding. The settlement conference was held on November 16, 2016.

Union filed a settlement proposal on November 23, 2016, which reflects settlement on three of the issues in the proceeding.

Union requested that a final Decision and Rate Order be issued by November 30, 2016 to allow its 2017 rates to be implemented with its January 1, 2017 QRAM.[2]

The following are OEB staff's submissions on: (a) the issues that do not form part of the settlement proposal; and (b) the settlement proposal. Overall, OEB staff has no concerns in regard to any of the unsettled issues and supports the settlement proposal as filed.

[1] EB-2013-0202, Decision and Order, October 7, 2013.
[2] EB-2016-0245, Exhibit A / Tab 1 / p. 14.

Unsettled Issues

OEB staff reviewed Union's application in the context of the approved IRM Framework, other applicable OEB policies, relevant OEB decisions, and the OEB's statutory obligations.

Price Cap Adjustments

The IRM Framework includes a price cap index (PCI) adjustment that uses an inflation factor (I) and a productivity factor (X); PCI = I – X. The IRM Framework also allows for certain non-routine adjustments (Z-Factors), certain pre-determined pass-throughs (Y-Factors) and an adjustment for Normalized Average Consumption (NAC) to reflect changes in consumption in the general service rate classes.[3]

Inflation Factor

The inflation factor used in Union's PCI mechanism is the actual year-over-year percentage change in the annualized average of four quarters of Statistic Canada's Gross Domestic Product Implicit Price Index Final Domestic Demand (GDP IPI FDD).

Union noted that, for 2017 rates, the inflation factor is 1.66%. The approved annual productivity factor is 60% of the inflation factor. For 2017 rates, the X factor is 1.00% and therefore, the PCI is 0.66%. Overall, the PCI adjustment results in an increase to the revenue requirement of approximately $6.01 million.[4]

OEB staff submits that the PCI adjustment proposed by Union is in accordance with its approved IRM Framework.

Z-Factor Adjustment

Tax Changes

Any impacts resulting from tax changes are shared equally between Union and ratepayers as per the approved IRM Framework.

[3] EB-2016-0245, Exhibit A / Tab 1 / p. 1.
[4] EB-2016-0245, Exhibit A / Tab 1 / pp. 3-4.

Union noted that, beginning January 1, 2017, changes are expected to the tax treatment of cumulative eligible capital (CEC). Union stated that the financial impact of this change is $2,000 which is subject to 50:50 sharing. However, due to materiality, Union proposed not to reflect this amount in 2017 rates.[5]

OEB staff agrees with Union that the tax change amount is not material. Therefore, OEB staff submits that it is appropriate to not include the amount in 2017 rates.

Y-Factor Adjustments

The IRM Framework provides for a number of Y-Factors that are not subject to adjustment under the price cap formula. The impact of these Y-Factors are passed through to customers in rates. The Y-Factors include:

- Cost of gas and upstream transportation costs as defined in EB-2011-0210 (Union's last rebasing proceeding);
- Demand Side Management (DSM) budget changes as determined in EB-2015-0029 (DSM Plan proceeding) and any subsequent OEB proceeding;
- Lost Revenue Adjustment Mechanism (LRAM) for the contract rate classes;
- Unaccounted for gas volume variances; and
- Major capital projects.

Cost of Gas and Upstream Transportation Costs

The cost of gas and upstream transportation costs reflected in the application are based on Union's October 1, 2016 QRAM application as approved by the OEB (EB-2016-0247).[6]

Union noted that its upstream gas costs will continue to be determined using the OEB-approved QRAM methodology.[7]

OEB staff submits that Union's proposed 2017 rates properly reflect the most recently approved upstream gas costs.

[5] EB-2016-0245, Exhibit A / Tab 1 / pp. 4-5.
[6] EB-2016-0247, Decision and Order, September 22, 2016.
[7] EB-2016-0245, Exhibit A / Tab 1 / p. 5.

DSM Budget Changes

Union requested approval to include its 2017 OEB-approved DSM budget of $58.57 million[8] in 2017 rates. This reflects an increase of about $1.75 million over 2016 OEB-approved. The difference between actual and budgeted for 2017 will be captured in the DSM Variance Account (DSMVA). Union also set out the allocation of the DSM budget to rate classes.[9]

Union confirmed that the 2017 DSM budget was allocated to rate classes using the methodology approved by the OEB in Union's DSM Plan proceeding (EB-2015-0029). Union identified minor changes to the allocation of the DSM budget to rate classes in 2017 rates which are driven by 2017 DSM program changes, and related changes to the program budgets, between 2016 and 2017.[10]

OEB staff submits that the proposed updated 2017 DSM budget is in accordance with the OEB's decision in Union's DSM Plan proceeding.[11] OEB staff also submits that the allocation of the 2017 DSM budget is in accordance with the approved methodology established in Union's DSM Plan proceeding.[12]

LRAM for Contract Rate Classes

Union requested approval of an adjustment to its 2017 contract rate class delivery volumes to reflect the impact of its 2015 DSM activities. Union proposed to update its 2017 contract rate class volumes based on its 2015 pre-audit results (as the 2015 audit process is not yet complete). Union noted that any difference between the 2015 pre-audit and post-audit results will be captured in the LRAM deferral account.[13]

OEB staff submits that Union's proposal to adjust the contract rate class volumes based on the pre-audit DSM results is appropriate and is in accordance with the approved IRM Framework and previous OEB decisions.

Major Capital Projects

[8] EB-2015-0029, Revised Decision and Order, February 24, 2016 at Schedule A.
[9] EB-2016-0245, Exhibit A / Tab 1 / p. 6 and Rate Order / Working Papers / Schedule 11.
[10] EB-2016-0245, Exhibit B / Staff 1 / p. 1.
[11] EB-2015-0029, Revised Decision and Order, February 24, 2016 at Schedule A.
[12] The approved allocation methodology is described at EB-2015-0029, Exhibit A / Tab 3 / p.10.
[13] EB-2016-0245, Exhibit A / Tab 1 / p. 6.

Union's IRM Framework includes a capital pass-through mechanism to adjust rates during the IRM term to reflect the associated impacts of significant capital investments made throughout the IRM term that are deemed "not business as usual". The projects are required to meet certain eligibility criteria.

Union included the approved 2017 costs associated with the following projects in 2017 rates:

1) Parkway West Project – revenue requirement of $17.18 million (approved in EB-2012-0433);
2) Brantford-Kirkwall / Parkway D Project – revenue requirement of $15.43 million (approved in EB-2013-0074);
3) Dawn Parkway 2016 System Expansion Project – revenue requirement of $29.12 million (approved in EB-2014-0261);
4) Burlington Oakville Pipeline Project – revenue requirement of $8.28 million (approved in EB-2014-0182); and
5) 2017 Dawn Parkway Project – revenue requirement of $6.76 million (approved in EB-2015-0200).

The total 2016 Y-Factor capital pass-through was $30.22 million. The total 2017 Y-Factor capital pass-through is $76.78 million. Therefore, the incremental Y-Factor capital pass-through for 2017 rates is $46.56 million.[14]

OEB staff notes that three of the major capital projects for which the Y-Factor capital pass-through mechanism applies have associated incremental project revenues.[15] Union recognized the revenues associated with the noted major capital projects by including the project-related M12 and C1 demands in 2017 rates.[16] OEB staff notes that this is the same manner in which these project-related revenues have been reflected in rates in the previous years of the IRM term.[17]

[14] EB-2016-0245, Exhibit A / Tab 1 / p. 7, Rate Order / Appendix G, and Rate Order / Working Papers / Schedule 3, 10.
[15] Brantford-Kirkwall / Parkway D Project, Dawn Parkway 2016 System Expansion Project and 2017 Dawn Parkway Project.
[16] EB-2016-0245, Rate Order / Working Papers / Schedule 4, pp. 20, 24.
[17] See EB-2014-0271 and EB-2015-0116.

Union confirmed, through its interrogatory responses, that the revenue requirement proposed to be included in rates for each major capital project are as approved by the OEB in the relevant Leave-to-Construct proceedings.[18]

OEB staff submits that the proposed 2017 major capital pass-through is appropriate and is in accordance with the approved IRM Framework, the approvals granted in the relevant Leave-to-Construct proceedings, and the treatment applied in previous IRM proceedings.

Normalized Average Consumption (NAC) Adjustment

Union adjusts its general service rates annually during the IRM term to reflect changes in NAC. NAC incorporates all volume changes, including changes due to average use and DSM activities for general service rate classes.

Union adjusted the general service storage and delivery rates for the 2015 actual NAC, using the OEB-approved weather normal methodology blend of 50:50 (30-year average and 20-year declining trend). For 2017, the NAC adjustment is the variance between 2014 and 2015 Actual NAC. The 2017 NAC adjustment ranges from -3.7% to -7.3% for rate classes 01, 10, M1 and M2.[19]

Union explained that the significant changes in NAC for the general service classes are being driven by changes in customer behaviour, estimated pre-audit DSM savings, changes to the variables in the weather normal calculation and a leap year adjustment.[20]

OEB staff submits that the proposed 2017 NAC adjustment is calculated in accordance with the approved IRM Framework.

General Service Delivery Rate Adjustment

Union's Rate M1 and Rate 01 classes have declining block structures for delivery rates. Union noted that, consistent with 2016 rates, it adjusted Rate M1 and Rate 01 distribution customer-related costs on a revenue neutral basis by adjusting the 2017

[18] EB-2016-0245, Exhibit B / Staff 3.
[19] EB-2016-0245, Exhibit A / Tab 1 / p. 8 and Rate Order / Working Papers / Schedule 12.
[20] EB-2016-0245, Exhibit B / Staff 9.

customer-related cost variance over all of the delivery volumes, as opposed to assigning the variance to the first delivery rate block, within each of the M1 and 01 rate classes.[21]

OEB staff submits that Union's proposed approach is appropriate as it maintains the declining block structure of the delivery rates.[22]

Rate Schedule Changes

Union requested approval to eliminate the Union North general service unbundled storage rate schedule (Rate S1) effective January 1, 2017.

Union stated that no customer has ever taken service under this rate schedule since it was introduced on January 1, 2000 and Union is not forecasting any customers to take the service in the future.[23]

OEB staff submits that no customers will be harmed by the elimination of the Union North general service unbundled storage service (Rate S1) and has no concerns with Union's proposal.

Deferral Accounts

Union stated that it requested no new deferral accounts as part of its application.[24]

OEB staff sought clarification as to whether the description for Union's OEB Cost Assessment Variance Account (Account No. 179-151) was approved by the OEB. Union stated that the account was established in accordance with the OEB's February 9, 2016 letter.[25] Union noted that it filed an accounting order for Account No. 179-151 with the OEB on March 8, 2016 and the OEB did not respond with any concerns.[26]

While Union's OEB Cost Assessment Variance Account (Account No. 179-151) was established on a generic basis, OEB staff submits that the current proceeding is the

[21] EB-2016-0245, Exhibit A / Tab 1 / p. 10.
[22] EB-2016-0245, Exhibit B / Staff 9.
[23] EB-2016-0245, Exhibit A / Tab 1 / pp. 12-13
[24] EB-2016-0245, Exhibit A / Tab 1 / p. 13.
[25] OEB Letter, Revisions to the Ontario Energy Board Cost Assessment Model, February 9, 2016.
[26] EB-2016-0245, Exhibit B / Staff 8(e). The letter was not filed as part of any formal proceeding before the OEB.

first proceeding where the description of the account is before the OEB. OEB staff submits that the description is in accordance with the OEB's February 9, 2016 letter and the description should be approved as filed.

OEB staff notes that Union did not propose a materiality threshold for the account.[27] The OEB's February 9, 2016 letter states "regulated entities are reminded that, in the normal course, any disposition of deferral and variance account balances must meet any OEB default or company-specific materiality thresholds".[28] OEB staff submits that the appropriate time to consider the materiality of any proposed recovery for an account that was established on a generic basis, is at the time that the account is brought forward for disposition. Therefore, this issue should be considered when Union requests disposition of any amounts in the variance account.

Union also noted that it will update the description for the Greenhouse Gas Emissions Impact Deferral Account (Account No. 179-152) in its 2017 Cap-and-Trade Compliance Plan proceeding (EB-2016-0296).[29] OEB staff submits that the description of the noted account should be updated and that the Compliance Plan proceeding is the appropriate proceeding in which those updates should be implemented.

Union requested closure of: (a) the Gas Supply Review – Consultant Cost account (Account No. 179-128); and (b) the Carbon Dioxide Offset Credits account (Account No. 179-117).[30]

OEB staff submits that it is appropriate to close both of these accounts as requested by Union as the accounts are no longer required.

<u>Gas Supply Plan</u>

As part of its application, Union filed its 2016 / 2017 Gas Supply Memorandum.[31] OEB staff notes that the Gas Supply Memorandum is filed for information purposes and does not require any findings the OEB as part of this proceeding.

[27] EB-2016-0245, Exhibit B / Staff 8(f).
[28] OEB Letter, Revisions to the Ontario Energy Board Cost Assessment Model, February 9, 2016 at p. 2.
[29] EB-2016-0245, Exhibit B / Staff 8(a).
[30] EB-2016-0245, Exhibit A / Tab 1 / p. 14.
[31] EB-2016-0245, Exhibit A / Tab 3.

Settlement Proposal

Union filed a settlement proposal on November 23, 2016, which reflects full settlement on the following three issues: Union North Cost Allocation and Rate Design, Parkway Delivery Commitment Incentive, and Rate T2 Customer Managed Service.

OEB staff submits that the OEB's approval of the settlement proposal would adequately reflect the public interest and would result in just and reasonable rates for customers. OEB staff also submits that the accompanying explanation and rationale is adequate to support the settlement proposal.

OEB staff's comments on each issue included as part of the settlement proposal are set out below.

Union North Cost Allocation and Rate Design

Union requested approval to implement changes to Union North storage and transportation rates in accordance with the Dawn Reference Price Settlement Agreement (EB-2015-0181) approved by the OEB.[32]

Union updated the 2017 Union North storage and transportation rates to reflect the gas supply plan for the 2017 calendar year (and to reflect the reference prices and tolls as approved by the OEB in Union's October 1, 2016 QRAM – EB-2016-0247) as agreed to in the Dawn Reference Price Settlement Agreement. The changes to the storage and transportation rates are based on a detailed cost allocation for each of the new Union North West and Union North East Zones.[33]

The parties agreed that it is appropriate to implement the changes to the Union North storage and transportation rates in the manner proposed by Union its application.[34] OEB staff supports the settlement proposal on this issue as the changes to the Union North storage and transportation rates are properly implemented in accordance with the Dawn Reference Price Settlement Agreement (EB-2015-0181).

Parkway Delivery Commitment Incentive

[32] EB-2015-0181, Decision and Order, January 7, 2016.
[33] EB-2016-0245, Exhibit A / Tab 1 / pp. 8-9.
[34] EB-2016-0245, Settlement Proposal, November 23, 2016 at p. 5.

In the 2013 rates proceeding (EB-2011-0210), Union's direct purchase customers requested that Union eliminate the Parkway Delivery Obligation (PDO) and allow customers to deliver gas to Union at Dawn because the cost to these customers to maintain the obligation exceeded the delivery rate benefit of the obligation. In the 2014 rates proceeding, Union reached an agreement with parties on the PDO issue. The OEB approved the Settlement Framework for Reduction of the Parkway Delivery Obligation (the PDO Reduction Settlement) (EB-2013-0365).[35]

The PDO Reduction Settlement approved by the OEB includes a Parkway Delivery Commitment Incentive (PDCI) for any continued obligated deliveries at Parkway beginning November 1, 2016 to direct purchase and sales service customers for all PDO volumes.[36]

In Union's 2016 rates application (EB-2015-0116), Union included the PDCI credit on the applicable rate schedules. In the current proceeding, Union updated the PDCI credit to reflect the proposed 2017 Rate M12 demand and fuel rates.

Beginning November 1, 2016, the PDCI credit will be paid monthly to direct purchase customers based on their obligated DCQ volumes at Parkway. The PDCI credit will be paid monthly to sales service customers by way of the South Purchase Gas Variance Account (SPGVA) as opposed to including the PDCI credit in the gas supply transportation rates. This is a departure from what was agreed to in the PDO Reduction Settlement. Union proposed to use the SPGVA rather than the gas supply transportation rate because the Union South transportation rate will be set to zero effective January 1, 2017 in accordance with the Dawn Reference Price Settlement Agreement (EB-2015-0181).

In total, Union requested approval to include PDCI costs of $16.56 million in rates effective January 1, 2017. Union allocated the PDCI costs to rate classes consistent with the allocation of the total PDO costs included in 2017 rates ($8.43 million) in accordance with the PDO Reduction Settlement.[37]

The parties agreed that Union's proposed inclusion of the PDCI costs of $16.56 million in 2017 rates is appropriate. The parties accepted, for the period January 1, 2017 to

[35] EB-2013-0365, Decision and Order on Parkway Delivery Obligation, June 16, 2014.
[36] EB-2013-0365, Decision and Order on Parkway Delivery Obligation, June 16, 2014, Appendix B / p. 4.
[37] EB-2016-0245, Exhibit A / Tab 1 / pp. 10-11 and Rate Order / Working Papers / Schedule 20.

October 31, 2017, that there is no excess Dawn to Parkway capacity available to facilitate Parkway deliveries (as supported by the interrogatory responses filed as Appendix A to the settlement proposal).[38]

OEB staff supports the settlement proposal on this issue as Union has properly included the PDCI costs of $16.56 million in 2017 rates and allocated the PDCI costs to rate classes in accordance with the PDO Reduction Settlement. OEB staff also submits that the PDO costs of $8.43 million are properly included in 2017 rates in accordance with the PDO Reduction Settlement.

OEB staff has no concerns with Union paying the PDCI to sales service customers through the SPGVA. As confirmed by Union, this departure from the PDO Reduction Settlement does not impact the PDCI costs nor the allocation to rate classes. The change in the PDCI payment methodology is a necessary outcome of the implementation of the Dawn Reference Price Settlement Agreement (EB-2015-0181) in 2017 rates.[39]

OEB staff also supports the language included in the settlement proposal regarding Union's assurance that it will continue, as originally agreed to in the PDO Reduction Settlement, to investigate opportunities to eliminate the remaining PDO provided that it can be eliminated in a manner that is more cost-effective for all of Union's ratepayers than the current PDO and PDCI costs included in rates. In the current settlement proposal, Union also acknowledged that it will consider whether incenting (as opposed to requiring) Parkway deliveries by Union's customers would be a cost effective option.[40]

Rate T2 – Customer Managed Service

Union requested approval of a new customer managed service (CMS) for new and existing T2 customers. The proposed CMS will allow for non-obligated deliveries at Dawn for applicable Rate T2 customers. The proposed service is designed to allow Rate T2 customers to actively manage their gas supply on a daily basis in accordance with their consumption.

[38] EB-2016-0245, Settlement Proposal, November 23, 2016 at p. 6 and Appendix A.
[39] EB-2016-0245, Exhibit B / Staff 7(b).
[40] EB-2016-0245, Settlement Proposal, November 23, 2016 at pp. 6-7.

Union noted that its proposed CMS service is being offered in response to customer requests for non-obligated deliveries at Dawn. The proposed CMS service is supported by Rate T2 customers that participated in a focus group led by Union.

Union stated that the CMS service is designed in manner that ensures:

- No impact on the amount of physical assets used by Rate T2 customers during the IRM term.
- Union remains financially neutral regardless of which customers elect to take the new service.
- No financial impact to other rate classes during the IRM term.
- The PDO reductions are maintained in accordance with the PDO Reduction Settlement.[41]

The parties accepted Union's proposal for the new CMS service for Rate T2 customers.[42] OEB staff supports the settlement proposal on this issue. OEB staff submits that Union designed the CMS service in a manner that provides the flexibility requested by its Rate T2 customers. OEB staff also submits that the proposed CMS design avoids rate impacts on Union's other customers and minimizes impacts on Union's revenues during the IRM term.[43] Finally, OEB staff submits that the use of the revenues collected through the Monthly Billing Adjustment as a credit against injection / withdrawal overrun charges incurred by Rate T2 customers[44] is appropriate as it protects Rate T2 customers that elect to take the CMS from overpayment associated with injection / withdrawal costs.

The settlement proposal also establishes reporting requirements regarding the revenue neutrality of the service and states that the CMS design will be reviewed at rebasing.[45] OEB staff submits that it is appropriate to review the CMS at rebasing as the availability

[41] EB-2016-0245, Exhibit A / Tab 4 / pp. 1-6.
[42] EB-2016-0245, Settlement Proposal, November 23, 2016 at p. 7.
[43] In its responses to interrogatories, Union noted that it maintains financial neutrality associated with the demand charges for injection / withdrawal rights through the CSM design. However, there may be some differences in revenues accrued related to storage space. Union provided three scenarios regarding the CMS service: (1) all T2 customers switch to CMS; (2) customers with above average contract demand switch to CMS; and (3) all customers elect T2 service that maximize storage space. Union compared the estimated revenues collected under these scenarios to the revenues collected under the existing T2 service. The analysis shows that the overall revenues collected by Union will not likely change significantly. EB-2016-0245, Exhibit B / Staff 12(d,e) and Exhibit B / LPMA 6.
[44] EB-2016-0245, Settlement Proposal, November 23, 2016 at p. 7.
[45] EB-2016-0245, Settlement Proposal, November 23, 2016 at p. 7.

of the service may impact the costs allocated to Rate T2 (and Union's other rate classes) as noted by Union in an interrogatory response.[46]

Draft Rate Order

The settlement proposal and OEB staff's submissions do not result in any changes to the 2017 rates as originally filed in Union's application.

OEB staff reviewed the draft rate order filed with Union's application and has no concerns.

Bill Impacts

If the OEB accepts the settlement proposal, which reflects no changes to Union's 2017 rates as filed, the resulting bill impacts, on an annual basis, for typical residential customers who use 2,200 m³ of natural gas per year are as follows[47]:

Previous Service Area	New Service Area	Annual Change	Annual Change (%)[48]
South	**South**	$13.35	1.9%
Fort Frances	**North West**	-$8.05	-0.9%
Northwestern	**North West**	$17.55	2.0%
Northern (Union SSMDA)	**North West**	-$28.75	-3.1%
Northern (Union NDA)	**North East**	-$11.17	-1.2%
Eastern	**North East**	-$50.33	-5.2%

Implementation and Customer Notice

Union requested that a final Decision and Rate Order be issued by November 30, 2016 to allow its 2017 rates to be implemented with its January 1, 2017 QRAM.[49]

[46] EB-2016-0245, Exhibit B / Staff 12(f).
[47] The rate changes set out in the table do not include the bill impacts associated with Union's Cap-and-Trade costs or the January 2017 QRAM adjustments also expected to be implemented on January 1, 2017. EB-2016-0245, Rate Order / Working Papers / Schedule 8.
[48] The annual change (%) is provided on a total bill basis.
[49] EB-2016-0245, Exhibit A / Tab 1 / p. 14.

The oral hearing is scheduled for November 30, 2016. OEB staff submits that if the OEB approves the application as filed at the oral hearing, a final Decision and Rate Order can be issued shortly after the OEB's oral decision is provided.

OEB staff submits that this will allow Union's 2017 rates to be implemented, along with Union's January 1, 2017 QRAM adjustments and Union's Cap-and-Trade related charges[50], on January 1, 2017.

OEB staff understands that Union will provide customers with notices of bill changes as part of its January 2017 QRAM proceeding as it will be the QRAM Rate Order that will supersede the Rate Order issued in this proceeding. OEB staff supports this proposal as the single customer bill notice will reflect all of the changes that customers will see on their bills beginning January 1, 2017 (including 2017 rates, Cap-and-Trade related costs, and the 2017 QRAM adjustments).

All of which is respectfully submitted.

[50] Union requested interim approval of its cap-and-trade related rates in the EB-2016-0296 proceeding. The OEB issued a Decision and Interim Order on November 24, 2016.