

December 19, 2016

VIA RESS AND COURIER

Ms. Kirsten Walli ONTARIO ENERGY BOARD P.O. Box 2319, 27th Floor 2300 Yonge Street Toronto, Ontario M4P 1E4 lan A. Mondrow Direct: 416-369-4670 ian.mondrow@gowlingwlg.com

Assistant: Cathy Galler Direct: 416-369-4570 cathy.galler@gowlingwlg.com

Dear Ms. Walli:

Re: EB-2016-0334: Union Gas Limited (Union) January 1, 2017 QRAM Application.

Industrial Gas Users Association (IGUA) Supplementary Comments.

In our December 14th letter of comment on Union's January, 2017 QRAM application we included the following comment [emphasis added]:

Board Staff has asked Union for some additional Dawn pricing information, which we believe will be helpful in providing context for the rate increases applied for in the instant application. <u>Any additional clarification that Union could provide to</u> <u>highlight, and isolate, the net customer impact of the shift to Dawn (as distinct from</u> <u>general price increases) would be helpful.</u>

Union responded to Board Staff's questions on December 16th. Union's responses do not include any additional clarification of net customer impact of the shift to Dawn, *per se*.

As indicated in our earlier submission, IGUA has no objection to approval of Union's application as filed.

We do note, however, that the materials filed to date do not provide, in a clear and consolidated fashion, an indication of the net customer impact of the shift from an Empress to a Dawn reference price, net of underlying commodity price increases, for the Union North East Zone and Union South. To clarify, we are interested in a presentation of the impact for January 1, 2017 of shifting to a Dawn reference price (which we believe will have a commodity price impact and a transportation cost impact, the two working in opposite directions), in isolation of changes to the commodity price over time.

Gowling WLG (Canada) LLP Suite 1600, 1 First Canadian Place 100 King Street West Toronto ON M5X 1G5 Canada

T +1 416 862 7525 F +1 416 862 7661 gowlingwlg.com

Gowling WLG (Canada) LLP is a member of Gowling WLG, an international law firm which consists of independent and autonomous entities providing services around the world. Our structure is explained in more detail at gowlingwlg.com/legal



We believe that a clear and consolidated statement of the impact of the shift to Dawn *per* se would be useful information to have on the record, and would appreciate it if Union could consider whether anything further in this respect could be provided.

Yours truly,

contro

lan A. Mondrow

cc. Dr. Shahrzad Rahbar (IGUA) Valerie Young (Aegent) Vanessa Innis (Union) Crawford Smith (Torys) Intervenors of Record (EB-2016-0245)

TOR_LAW\ 9081345\2