

December 21, 2016

VIA RESS AND COURIER

Ms. Kirsten Walli
ONTARIO ENERGY BOARD
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File No. T1008355

Dear Ms. Walli:

Re: EB-2016-0122 – Union Gas Limited (Union) 2016 Sudbury Replacement Project.

Request to Vary – Change Request No. 4: Comments of Industrial Gas Users Association (IGUA).

As representative of IGUA in its intervention in Union's 2016 Sudbury Replacement Project application, we are in receipt of Union's Friday, December 16th Request to Vary and the Board's Monday, December 19th approval thereof.

In its June 14, 2016 Submissions on Union's application, IGUA noted its support for the project, and in particular for the "upsizing" alternative advocated by Union as appropriate to increase the capacity of the Sudbury system. IGUA has intervened in recent Sudbury system expansion applications due to concerns of its members on the sufficiency of capacity on the system.

In its July 7, 2016 Decision approving Union's Sudbury Expansion, in addressing the need for the project the Board noted as follows [page 4]:

The OEB finds that the increase in pipeline diameter is an acceptable approach to provide the needed capacity for anticipated demand growth along the Sudbury pipeline system.

Union's Change Request No. 4 is for approval to a delay in the replacement of the 150 metre eastern section of the pipeline crossing Frood Road, which is now proposed to be completed in 2017 instead in 2016 as it was planned. According to Union, the delay is due to

the late completion of the 700 metre western section of the 2016 Sudbury Replacement Project.

While this change has already been approved, and while IGUA is not raising objection to this approval, we do note that neither Union's change request nor the Board's decision thereon address whether the delay in completion of this project will have any impact on available capacity on the Sudbury system during the current winter (2016/17) relative to the initial proposal to have the entire project completed this year.

IGUA requests that Union address this point on the record, indicating whether the delay in completion of the project is expected to impact the capacity available on the Sudbury system this winter. IGUA also requests that Union provide more information on the reasons for the late completion of the 700 metre western section of the 2016 Sudbury Replacement Project cited as the reason for the delay which is the subject of the most recent change request.

Yours truly,



Ian A. Mondrow

c: W.T. Wachsmuth (Union)
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