

**From:** Chris Butler [REDACTED]  
**Sent:** January-04-17 11:05 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** OEB File EB-2016-0296 - Letter of Comment Filing

Please consider this a formal letter of comment to be filed for both OEB reference and action for the upcoming OEB - Union Gas Cap & Trade hearing ( OEB file # EB-2016 -0296 ) . I am a Union Gas residential customer from London - Ontario.

### **Consumer Feedback - Comments to be Addressed**

1. At this point in time ( Jan 4-2017) preparing for the hearing the OEB has no record in this public reference file from Union Gas LTD of what the " **average** annual usage per residential customer " in Cubic Meters of Gas used per year is to support the OEB claim issued in their public notice 's across the media that the Cap and Trade costs will have a \$6.00 to \$7.00 per monthly increase impact in our Union Gas billings for the **average** customer. A letter to Union Gas Ltd to request to the " **average** annual usage per residential customer " to prepare for this hearing was met with a response that they do not disclose this information. Union Gas Ltd customer mailings ( Intouch insert ) only references the a " **typical** residential customer " uses 2200 cubic meters per year of gas because the OEB directs all Union Gas Ltd. cap and trade communications with customers under their mandate.

>> **ACTION REQUIRED** - That the OEB require a filing from Union Gas Ltd on the **average** ( not typical ) residential customer usage in meters of gas per year and the monthly \$\$\$ cap and trade costing impact be recalculated and communicated via the Intouch insert on customer mailings and in final communications from the OEB hearing for full disclosure. The OEB should eliminate all reference of " **typical** residential customer " from this EB -2016-0296 file as this is an OEB driven yardstick which is has no legal or mathematical terms of reference.

2. At this point in time ( Jan 4-2017 ) - Josh Wasylyk - OEB Project Advisor for this file EB-2016-0296 has confirmed there is no formal documented process yet defined for the OEB to **reconcile** the actual costs Union Gas Ltd has incurred to purchase Cap and Trade offsetting credits in the free market and compare these actual's with the Cap and Trade tariff of \$0.0033 per cubic meter of gas used buried in the delivery to you line of the Union Gas billings. This does nothing to support Union Gas Ltd customer trust levels going forward and does nothing to support the OEB mandate of supporting customer fairness.

>> **ACTION REQUIRED** - That the OEB develop a timely - accurate process to reconcile the Cap and Trade tariff costs with the actual costs incurred by Union Gas to purchase carbon credits and publish that process as part of the OEB final hearing results. This process should also include a commitment to re-bait any HST costs incurred by customers based on the reconciled difference in costs. This process should be CUSTOMER FOCUSED and communicated via the Intouch insert by Union Gas to support the trust levels required going

forward and called out clearly on the residential gas billing when a re-bait is issued. ( Not many customers will go to the OEB website to reference this process )

Thanks

Chris Butler -

