

BY COURIER & RESS

May 5, 2017

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
Suite 2700, 2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

**RE: EB-2016-0296 – Union Gas Limited (“Union”) – Cap-and-Trade Undertaking  
Response – Confidential Treatment**

Dear Ms. Walli,

The purpose of this submission is to demonstrate to the Ontario Energy Board (“OEB”) Staff that confidential treatment of Union’s response to undertaking J3.1 is warranted.

Consistent with its May 1, 2017 submission, Union maintains this response should be treated as confidential as it contains commercially sensitive information. For this reason, a redacted version of this response was filed on the OEB’s RESS. Union has also filed an un-redacted version with the Board consistent with the OEB’s Practice Guidelines on Confidential Filings and Rule 10 of the OEB’s Rules of Practice and Procedures.

Union asserts that providing the information requested would reveal its pricing strategy and undermines its competitive position in the conservation program market in the future. Further, while the Home Reno Rebate Program is a Demand Side Management (“DSM”) program, incremental funding was negotiated between Union and the Ministry of Energy through the Green Investment Fund (“GIF”). Union is not requesting that any incremental costs associated with the program be recovered through its rates. As such, there is no need for these costs to be made public.

Aside from its concern about public disclosure, Union also questions the relevance of the information as it pertains to the scope of the proceeding. In Union’s view, consistent with its interrogatory response in Exhibit B.Staff.10, specifics of the GIF - Home Reno Rebate program, including budget details, are more appropriately framed within the

context of DSM. This is supported by the Board Panel's finding that a DSM expert was not required on Union's witness panel.<sup>1</sup>

If you have any questions with respect to this submission please contact me at 519-436-4558.

Yours truly,

*[Original signed by]*

Adam Stiers, MBA  
Manager, Regulatory Initiatives  
Regulatory Affairs

CC: C.Smith (Torys)  
EB-2016-0296 Intervenors

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<sup>1</sup> Day 2 TR, p. 56, lines 17-20

UNION GAS LIMITED

Undertaking of Ms. Byng  
To: Mr. Brett

To provide the breakdown of the Home Reno Rebate Program.

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Union has provided the requested data to the Board in confidence due to commercial sensitivity. Provided below is a redacted version of this response.

The table below provides an annual breakdown of the Home Reno Rebate budget from the Green Investment Fund.

Green Investment Fund – Home Reno Rebate Program Budget			
Year	('000 000)		
2016			
2017			
2018			
<b>Total</b>			