

May 24, 2017

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
P.O. Box 2319  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli:

**Re: Union Gas Limited – EB-2017-0091 - Disposition of 2016 Deferral and Variance Accounts**

I am a consultant to the Consumers Council of Canada (“Council”). I have been instructed by my client to intervene in the proceeding to consider the Application to the Ontario Energy Board (“OEB”) by Union Gas Limited (“Union”) for approval regarding the disposition and recovery of its 2016 Deferral and Variance Accounts. The Council is a public-interest entity which represents the interests of residential consumers in Ontario. The Board’s order in this proceeding will ultimately impact the rates that residential consumers pay for the delivery of natural gas.

On October 17, 2016, the Council filed with the Board, pursuant to Rule 22.03 of the Ontario Energy Board’s Rules of Practice and Procedure, a document describing the Council, its mandate and objectives, membership, the constituency represented, and the types of activities the Council carries out. In addition, we provided a list of the individuals authorized to represent the Council in Board proceedings.

The nature and scope of the Council’s intended participation in the proceeding will be the following:

1. To test the Applicant’s evidence specifically with respect to assessing the appropriateness of the proposals to deal with the balances in the 2016 accounts;
2. To assess any other proposals that have been set out in the Application that may impact Union’s residential ratepayers; and
3. To participate in the various stages of the proceeding which may include an interrogatory process, a technical conference, a settlement conference and an oral hearing.

The Council intends to ask for an order of costs in this proceeding. The Council has participated in many of the applications of Union over a long period of time. In all of those proceedings the Council has been recognized as being eligible for an award of costs. In the absence of an award of costs the Council would be unable to participate in this proceeding.

Copies of all Board Notices and hard copies of the Applicant’s evidence should be sent to me, at 62 Hillside Avenue East, Toronto, Ontario, M4S 1T5. My telephone number is 416-322-7936 and my e-mail is [jgirvan@uniserve.com](mailto:jgirvan@uniserve.com).

We recognize that we have missed the official deadline for interventions and are hereby asking for late intervention status. I had simply overlooked the e-mail setting out the Notice Of Application. We apologize for missing the deadline and are prepared to proceed within the current process established by the Board.

Please let us know if any further information from the Council is required at this time.

Yours truly,

*Julie E. Girvan*

Julie E. Girvan

CC: Ken Whitehurst, Consumers Council of Canada  
Union Gas, Regulatory Affairs