

SCOTT POLLOCK  
T 613.787.3541  
spollock@blg.com

Borden Ladner Gervais LLP  
World Exchange Plaza  
100 Queen St, Suite 1300  
Ottawa, ON, Canada K1P 1J9  
T 613.237.5160  
F 613.230.8842  
blg.com



Our File # 339583-000019

By electronic filing

September 18, 2017

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> floor  
Toronto, ON M4P 1E4.

Dear Ms. Walli

**Re: Union Gas Limited (“Union”)  
October 1, 2017 QRAM Application  
Board File #: EB-2017-0278**

We are writing on behalf of Canadian Manufacturers & Exporters (“CME”). Please consider this correspondence as CME’s written comments on Union’s QRAM Application, which seeks changes to Union’s rates for the sale, distribution, storage and transmission of natural gas effective October 1, 2017.

As the Board is aware, it is CME’s practice to conduct a due diligence review of Union’s QRAM Applications.

CME wishes to better understand the negative purchase volumes that Union is forecasting in their Union North West service territory.

At Tab 1 Schedule 1 line 5, Union forecasts negative purchase volumes for the Union North West service territory between April of 2018 and September of 2018.

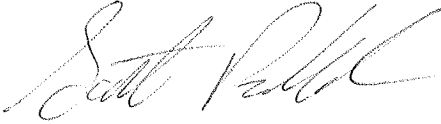
- 1) If the negative forecasts were done in error, please provide an update to the bill impacts for commercial and industrial customers in the Union North West service territory.
- 2) If the negative forecasts were not erroneous, please provide an explanation for why Union forecasts negative purchase volumes.
- 3) If the negative forecasts were not erroneous, please confirm whether or not Union would be reselling excess gas as a result of negative forecasts.

We request an opportunity to provide further comments, if required, once Union has provided answers to these questions.

CME also requests an award of its reasonably incurred costs in connection with conducting its examination of Union's QRAM Application.

Yours very truly

Borden Ladner Gervais LLP



Scott Pollock

- c. Vanessa Innis (Union)  
Crawford Smith (Torys)  
All Interested Parties EB-2016-0245  
Paul Clipsham and Ian Shaw (CME)

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