



Fogler, Rubino LLP  
Lawyers

77 King Street West  
Suite 3000, PO Box 95  
TD Centre North Tower  
Toronto, ON M5K 1G8  
t: 416.864.9700 | f: 416.941.8852  
foglers.com

October 19, 2017

Reply To: Thomas Brett  
Direct Dial: 416.941.8861  
E-mail: [tbrett@foglers.com](mailto:tbrett@foglers.com)  
Our File No. 168193

**VIA RESS, EMAIL AND COURIER**

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario  
M4P 1E4

Attention: Kirsten Walli,  
Board Secretary

Dear Ms. Walli:

**Re: Cap and Trade Compliance Plans (Combined Proceeding): Enbridge Gas Distribution Inc. (EB-2016-0300), Union Gas Limited (EB-2016-0296) and Natural Resource Gas Limited (EB-2016-0330)**

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BOMA has reviewed the OEB's decision in EB-2016-0296/0300/0330, and the Rate Orders and Accounting Orders filed by the utilities on October 5, 2017.

BOMA agrees with Union's Rate Order and Accounting Order and with EGD's Draft Rate Order and Accounting Order, subject to the following comments on the Draft Rate Order.

Page 1 of the Residential Service description at p11 of the Rate Handbook, and in comparable pages for most other rate classes, EGD shows, properly, as part of Rate 1, the Cap and Trade Customer-Related Charge and the Cap and Trade Facility Related Charge.

In the paragraph immediately following the Cap and Trade Charges line, it states:

*"The rates noted above shall be subject to the Gas Cost Adjustment contained in Rider "C" and ...".*

However, given the manner in which the Cap and Trade Charges are calculated, it seems that those charges are, unlike the other rate components, not subject to those riders. A clause may need to be added to the paragraph to recognize that fact.

In addition, it would seem appropriate to include a definition of the Cap and Trade Charges in the Glossary of Terms.

BOMA has no comments on the NRG Rate Order and Accounting Order.

Yours sincerely,

**FOGLER, RUBINOFF LLP**



Thomas Brett

TB/dd

cc: All Parties (*via email*)