

November 30, 2017

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

Dear Ms. Walli:

**RE: EB-2016-0296 - Union Gas Limited – 2017 Cap-and-Trade Compliance Plan  
– Comments on Cost Claims**

Union Gas Limited (“Union”) received cost claims for the above noted proceeding from:

- Association of Power Producers of Ontario (“APPrO”),
- Building Owners and Managers Association, Greater Toronto (“BOMA”),
- Consumers Council of Canada (“CCC”),
- Canadian Manufacturers & Exporters (“CME”),
- Federation of Rental-housing Providers of Ontario (“FRPO”),
- Industrial Gas Users Association (“IGUA”),
- London Property Management Association (“LPMA”),
- Low Income Energy Network (“LIEN”),
- School Energy Coalition (“SEC”),
- Environmental Defence (“ED”), and
- Ontario Sustainable Energy Association (“OSEA”).

Union has reviewed the cost claims and, with the exception of BOMA, has no specific concerns. The cost claim submitted by BOMA appears to exceed the next highest claim and the approximate average of the other claims by approximately three times.

Based on the foregoing, the costs being claimed by BOMA appear to be excessive. The Ontario Energy Board should consider this when reviewing this cost claim.

Yours Truly,

*[original signed by]*

Adam Stiers

Manager, Regulatory Initiatives

cc: Crawford Smith, Torys  
All Intervenors (EB-2016-0296)