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Our File # 339583-000019

By electronic filing

June 18, 2018

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”)  
July 1, 2018 QRAM Application  
Board File #: EB-2018-0174**

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 July 1, 2018.

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 why nearly half of the spot gas purchase variance is attributable to unaccounted for gas (“UFG”).

CME invites Union to explain whether it is a normal allocation between forecast customer demand and UFG, or specific to the assumptions Union made for the winter of 2017/2018. In either event, please provide the drivers of that allocation.

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

A handwritten signature in black ink, appearing to read 'Scott Pollock', is written over a light blue horizontal line.

Scott Pollock

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