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Our File # 339583-000019

By electronic filing

December 14, 2018

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

Dear Ms. Walli

**Re: Union Gas Limited (“Union”)
January 1, 2019 QRAM Application
Board File #: EB-2018-0315**

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 January 1, 2019.

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 customer bill impacts outlined in the application as they relate to other rate changes scheduled for Q1, 2019.

At EB-2018-0315, Tab 2, page 9 of 11, Union indicates that it does not feel that rate mitigation measures are warranted for the Union North-West zone under the circumstances. Union states that three additional rate decreases are set to come into effect on January 1, 2019, and these decreases ameliorate the overall bill impact.

CME invites Union to answer the following questions:

- 1) Can Union confirm if there will be any drivers of rates, other than those discussed in EB-2018-0315, which are effective January 1, 2019, or are proposed to be effective January 1, 2019 that will increase rates, and may exacerbate the customer impacts of the increases discussed in EB-2018-0315 (for instance, the carbon levy proposed by Union in EB-2018-0187)?
- 2) If so, please list these independent rate drivers.

- 3) Please provide a combined or 'all-in' calculation of the bill impacts of all approved or proposed rate changes effective January 1, 2019, in order to demonstrate what changes, if any, ratepayers will experience between their current bill, and the proposed bills effective January 1, 2019. For further clarity, please break out the calculation by cost driver, as well as rate zone and rate class, in the same manner as EB-2018-0315 Tab 2, Schedule 5. To the extent that this calculation requires the use of assumptions, please list them.

CME 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

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All Interested Parties EB-2016-0245
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