



January 9, 2019

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

Dear Ms. Walli:

Re: EB-2018-0105 – Union Gas (“Union”) – 2017 Disposition of Deferral Account Balances and 2017 Utility Earnings – Submission on Cost Claims

On December 6, 2018, the Board released its Decision and Rate Order in the EB-2018-0105 proceeding. Union received cost claims for the proceeding from the following parties:

- Building Owners and Managers Association, Greater Toronto (“BOMA”),
- Consumers Council of Canada (“CCC”),
- Energy Probe Research Foundation (“Energy Probe”),
- Federation of Rental-housing Providers of Ontario (“FRPO”),
- Industrial Gas Users Association (“IGUA”),
- London Property Management Association (“LPMA”),
- Ontario Greenhouse Vegetable Growers (“OGVG”),
- School Energy Coalition (“SEC”), and
- Vulnerable Energy Consumers Coalition (“VECC”).

Union and Enbridge Gas Distribution amalgamated effective January 1, 2019 to become Enbridge Gas Inc. (“Enbridge Gas”).

Enbridge Gas notes that while BOMA and FRPO largely addressed issues that were similar to those raised by other parties in this proceeding, their costs claims exceeded the average of all cost claims by over \$9,000 and \$7,000, respectively. Further, FRPO claimed 14 hours for argument preparation, which as demonstrated in Union’s Reply Argument, largely repeated the arguments FRPO made in the EB-2017-0306/EB-2017-0307 proceeding.¹ In its EB-2018-0105 Decision the OEB acknowledged parties’ submissions on the broader issue of Union’s PDO framework but found that this broader issue was out of scope for this proceeding.² Enbridge Gas believes that the Board should consider the scope of the issues argued, in addition to the amount of the cost claims in relation to the average claim when determining the cost awards for this proceeding.

¹ EB-2018-0105, Union Gas Reply Argument, Appendix A.

² EB-2018-0105, Decision and Order, November 26, 2018, p.7

If you have any questions on this matter, please contact me at 519-436-5334.

Sincerely,

[original signed by]

Vanessa Innis
Manager, Regulatory Applications

cc: Lawrie Gluck (OEB)
Michael Millar (OEB)
EB-2018-0105 Intervenors