



By E-mail and Electronic Filing

March 9, 2009

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

Dear Ms Walli

Union Gas Limited
GRAM Rate Application – Effective April 1, 2009
Board File No.: EB-2009-0054
Our File No.: 339583-000019

I am writing on behalf of our client, Canadian Manufacturers & Exporters (“CME”) to provide comments on Union Gas Limited’s (“Union”) GRAM Rate Application which seeks changes to Union’s gas supply and transportation rates to reflect changes to the forecasted costs of purchasing and transporting natural gas.

We have reviewed Union’s GRAM Application, and also sought clarification from Union on the 9.10 PJs of incremental gas purchased to meet demands above forecast for the period January 1, 2009 to February 28, 2009 [Tab 1, Page 6 of 8]. Based on the clarifications received by Union, CME is satisfied that the incremental gas purchased for sales service customers in the South and sales service and bundled direct purchaser customers in the North is consistent with the Board’s Decisions on load balancing contained in RP-2003-0063 and EB-2005-0520. After receiving clarification from Union on the incremental gas purchased, CME is satisfied with Union’s GRAM Application. As such, CME does not oppose the relief sought by Union.

We urge the Board to take comfort from the fact that Union’s GRAM Application has been subject to ratepayer scrutiny. In our respectful submission, the review of GRAM Applications by CME contributes to the regulatory process.

CME requests an award of its reasonably incurred costs in connection with conducting its examination of Union’s GRAM Application, including the clarification sought by CME. We will submit a claim for costs on behalf of CME if the Board responds favourably to this request.

Yours very truly

Vincent J. DeRose
VJD/kt

c. Chris Ripley (Union)
Michael Penny (Torys)
EB-2008-0220 Intervenors
Paul Clipsham (CME)

OTT01\3671285\1

RECEIVED

MAR 12 2009

ONTARIO ENERGY BD

Borden Ladner Gervais LLP
Lawyers • Patent & Trade-mark Agents
World Exchange Plaza
100 Queen Street, Suite 1100
Ottawa ON K1P 1J9
tel.: (613) 237-5160 fax: (613) 230-8842
www.blgcanada.com

VINCENT J. DeROSE
direct tel.: (613) 787-3589
e-mail: vderose@blgcanada.com

OEB BOARD SECRETARY	
File No:	SubFile: 19
Panel	KA
Licensing	SRW/JC
Other	
00/04	

Vancouver
Toronto
Ottawa
Montréal
Calgary