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Toronto, October 31, 2008

Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2700
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli:

RE: Union Gas Limited
Application for 2009 Rates - EB-2008-0220
APPrO Letter of Intervention

We are legal counsel to the Association of Power Producers of Ontario ("APPrO"). We are writing on behalf of APPrO to request intervenor status in the application of Union Gas Limited for the approval or fixing of rates and other charges for the sale, distribution, transmission and storage of natural gas effective January 1, 2009 (EB-2008-0220).

APPrO is a non-profit organization representing more than 100 companies involved in the generation of electricity in Ontario, including generators and suppliers of services, equipment and consulting services. APPrO members, who currently produce over 95% of electricity made in Ontario, produce power from gas, cogeneration, hydroelectric, coal, nuclear, wind energy, waste wood and other facilities.

A significant portion of Ontario's new electricity supply will come from gas-fired generation and there are a number of existing gas-fired generators operating in Ontario at present. As a result, many of APPrO's members have a direct interest in the outcome of this proceeding. APPrO will be in a position to ensure that the interests of all of its gas-fired generator members are brought forward.

APPrO takes no position on whether the proceeding is conducted by way of oral or written hearing. For the purposes of this intervention, APPrO intends to seek a determination by the Board at the conclusion of this proceeding that APPrO is eligible for a cost award. As APPrO represents the direct interests of gas-fired generators who are ratepayers in relation to the regulated services provided by Union Gas Limited, it will seek eligibility as a representative of a customer class.

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Please direct all notices and all materials related to the above-noted proceeding to:

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Attention: David Butters, President

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Attention: John Wolnik

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Yours very truly,

Ogilvy Renault LLP

A handwritten signature in black ink, appearing to be "RJ King", written over the printed name "Richard J. King".

Richard J. King

RJK/mnm

c.c. Chris Ripley, Manager, Regulatory Applications, *Union Gas Limited* (via email)