

January 15, 2016

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

Dear Ms. Walli:

Re: EB-2015-0247 – Mandatory Record Retention Period for Regulated Entities - Union Gas Comments

On December 10, 2015, the Ontario Energy Board (“OEB”) issued a letter seeking comments on its proposed record retention amendments to the OEB Regulatory Instruments (RRR, Codes and Rules).

Union reviewed the proposed changes and has the following comments:

1. Union does not foresee any significant issues with meeting the proposed ten year record retention requirement for the OEB Regulatory Instruments.
2. The distributor should have discretion regarding the format of the records (i.e. paper vs. electronic). Distributors file information with the Board in both written (e.g. confidential filings, RRR submissions) and electronic format.
3. The proposed changes should only apply to information required for regulatory purposes and should not be applied to the distributor’s corporate or operational requirements.
4. The implementation of the proposed changes should be done on a prospective basis. Distributors may not have retained the information from ten years ago if their internal policies required a shorter retention period; therefore the information may not be available.

If you have any questions or concerns on this matter, please contact me at 519-436-5476.

Yours truly,

[Original Signed by]

Chris Ripley
Manager, Regulatory Initiatives

cc: All Intervenors (EB-2015-0247)