

October 7, 2020

VIA RESS

Ms. Christine E. Long
Registrar & Board Secretary
ONTARIO ENERGY BOARD
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Dear Ms. Long:

Re: EB-2020-0206: EPCOR Natural Gas Limited Partnership (EPCOR) – Southern Bruce October 1, 2020 Quarterly Rate Adjustment Mechanism (GRAM).

Industrial Gas Users Association (IGUA) Comments.

We write as legal counsel to IGUA.

In that capacity, on September 29th we received an e-mail from Tim Hesselink of EPCOR attaching the Board's letter to EPCOR herein dated September 28th, EPCOR's October, 2020 QRAM Application, and a copy of EPCOR's responses to OEB Staff's questions on the Application. The OEB's letter explains that EPCOR had not served its application on intervenors of record in proceeding EB-2018-0264 (EPCOR's Southern Bruce 2019 – 2028 Rate Application), of which IGUA was one. On behalf of IGUA we had not received notice of EPCOR's application until receipt of Mr. Hesselink's e-mail of September 29th.

In its September 28th letter the Board directed EPCOR to serve the materials outlined above on intervenors of record in EB-2018-0264, and provided 5 calendar days for the parties so served to file comments on the EPCOR's application. The Board indicated that it would then determine whether any amendments to its Decision on the Application already issued were required.

On behalf of IGUA we have now reviewed the materials served by EPCOR, and can advise the Board that on the basis explained below we have no concerns in respect of EPCOR's application.

We were initially curious about why administrative costs “directly related to acquisition of gas for system customers” were proposed by EPCOR to be tracked in a Storage and Transportation Variance Account¹. Our review of the balance of the application materials indicates that the variance

¹ See EPCOR response to OEB Staff Question 1(c).

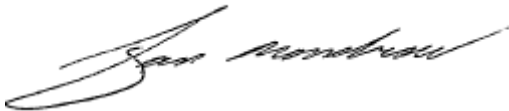
account in issue applies only to EPCOR South Bruce Rates 1, 6 and 11.² IGUA's constituents in EPCOR's South Bruce service territory are served under EPCOR South Bruce Rate 16. Rate 16 is subject to a separate Transportation Variance Account³, which on our understanding of the evidence is not engaged in this Application.

In the result, our review of the evidence indicates that none of EPCOR's requests in this QRAM Application impact, in any way, Rate 16 customers. ***We would appreciate EPCOR's confirmation of this understanding.***

Assuming that our understanding is correct, IGUA offers no comment on, or objection to, the approval of EPCOR's Application as filed.

We appreciate the Board directing that this matter be brought to the attention of intervenors in EPCOR's previous rate application. As representative of one such intervenor, representing EPCOR's large volume customers in that previous application, IGUA asked that we review the instant application to identify any potential impacts on those EPCOR customers. We have attempted to do so efficiently as well as effectively, and accordingly request that IGUA be awarded recovery of its costs reasonably incurred in connection with our review and this brief submission.

Yours truly,



Ian A. Mondrow

- c. Dr. Shahrzad Rahbar (IGUA)
Tim Hesselink (EPCOR)
Arturo Lau (OEB Staff)
Intervenors of Record (EB-2018-0264; EB-2019-0264)

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² See, for example, EPCOR's Application, sub-paragraph 2.c), which is confirmed on this point in subsequent evidence filed by EPCOR in support of its Application.

³ See EPCOR Response to Staff Question 1.e.