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January 24, 2011

BY EMAIL AND COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Integrated Grain Processors Co-operative Inc. and IGPC Ethanol Inc.
Comments on Revised Draft Rate Order
Board File No. EB-2010-0018**

We are in receipt of the response of Natural Resource Gas Ltd. ("NRG") dated January 18, 2011.

IGPC has reviewed the methodology used to calculate the amount closed to rate base for the IGPC Pipeline. The amount now sought to be closed to rate base is \$4,872,182. While IGPC continues to disagree with the total capital cost of the IGPC Pipeline, IGPC will not dispute the amount closed to rate base in the revised draft rate order. IGPC would note that it is still not clear how the calculation provided by NRG is compliant with the Board's Decision.

As the parties to this proceeding are aware, IGPC brought a motion in August 2010 contesting, *inter alia*, the reasonable actual capital cost of the IGPC Pipeline. That motion was adjourned pending the outcome of the rate application and, hopefully, IGPC and NRG being able to resolve the underlying dispute. Therefore, IGPC reserves all of its rights to contest the capital cost of the IGPC Pipeline and the determination of the refund owed to IGPC by NRG resulting from IGPC's over-contribution to the IGPC Pipeline.

An electronic copy of the enclosed, in searchable Adobe Acrobat format, will be filed today through the Board's Regulatory Electronic Submission System.

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Yours truly,

AIRD & BERLIS LLP



Scott Stoll

SAS:ct
Enclosures

cc Intervenors in EB-2010-0018

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