

# AIRD & BERLIS LLP

Barristers and Solicitors

Scott A. Stoll  
Direct: 416.865.4703  
E-mail: sstoll@airdberlis.com

April 10, 2012

VIA COURIER, EMAIL AND RESS

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> Floor, Box 2329  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Notice of Application for Intervention  
EB-2012-0072**

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We are counsel to Integrated Grain Processor's Co-operative Inc. ("IGPC") in the aforementioned matter.

We are in receipt of the Application for Gas Franchise Approval for the Town of Alymer. IGPC hereby requests intervenor status for the proceeding.

Please find attached our formal Notice of Application for Intervention which will be filed on RESS with two (2) hard copies being couriered to the Board Secretary

Yours truly,

AIRD & BERLIS LLP



Scott A. Stoll  
Encl.

SAS/hm

cc: R. King, Counsel for NRG  
J. Reynaert, Town of Alymer  
P. Tunley, Counsel for the Town of Almer  
B. Cowan, NRG  
L. O'Meara, NRG

ONTARIO ENERGY BOARD

**AND IN THE MATTER OF** the *Municipal Franchises Act*, R.S.O. 1980, Chapter 309, as amended;

**AND IN THE MATTER OF** an Application for the renewal of a franchise agreement between Natural Resource Gas Limited and the Corporation of the Town of Aylmer.

**NOTICE OF APPLICATION FOR INTERVENTION**

1. IGPC Ethanol Inc. and the Integrated Grain Processors Co-operative Inc. ("IGPC") own and operate a 150 million litre per year ethanol facility in the Town of Aylmer (the "Facility"). This Facility receives natural gas by means of a dedicated pipeline operated by Natural Resources Gas Limited ("NRG") which connects the Facility to the Union Gas Limited system.
2. NRG has applied, pursuant to Section 10 of the *Municipal Franchises Act*, to renew its franchise for a term of 20 years.
3. IGPC participated in the previous Application to renew the Franchise Agreement between the Town of Aylmer and NRG.
4. IGPC was served with the notice of the application on April 3, 2012.
5. The Facility relies upon the supply of natural gas for its operations and such supply could be impacted by the outcome of this proceeding. IGPC is the largest ratepayer of NRG, with its own rate classification. NRG, in its prefiled evidence, has indicated there is an issue regarding cost allocation. Cost allocation has an impact on rates and therefore, IGPC has a significant interest in this proceeding and its outcome.
6. As such, IGPC requests full status of an intervenor in this proceeding and reserves its rights to file evidence, cross-examine witnesses, make submissions, and generally fully participate in this proceeding. At the time of filing this intervention, IGPC does not intend to file evidence.
7. IGPC prefers correspondence in English.
8. All communications in respect of this proceeding should be copied to:

Mr. Jim Grey  
CEO  
IGPC  
P.O. Box 205  
89 Progress Drive  
Aylmer, ON N5H 2R9

Email: [jgrey@igpc.ca](mailto:jgrey@igpc.ca)

Scott Stoll  
Aird & Berlis LLP  
Barristers and Solicitors  
Brookfield Place, 181 Bay Street  
Suite 1800, Box 754  
Toronto, On M5J 2T9

Email: [ssoll@airdberlis.com](mailto:ssoll@airdberlis.com)

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

Dated: April 10, 2012

**AIRD & BERLIS LLP**  
Barristers and Solicitors  
181 Bay Street, Suite 1800  
Toronto, ON M5J 2T9

**Scott Stoll**  
Tel: 416-865-4703  
Facsimile: 416.863.1515

Counsel for IGPC

TO: Board Secretary  
Ontario Energy Board

AND TO: B. Cowan, Natural Resource Gas Limited  
[cowan@nrgas.ca](mailto:cowan@nrgas.ca)

L. O'Meara, Natural Resource Gas Limited  
[lomeara@cpirentals.com](mailto:lomeara@cpirentals.com)

And TO: Richard J. King, Counsel for NRG  
[Richard.king@nortonrose.com](mailto:Richard.king@nortonrose.com)

And TO: Jennifer Reynaert, Administrator, Town of Aylmer  
[jreynaert@town.aylmer.on.ca](mailto:jreynaert@town.aylmer.on.ca)

AND TO: Phil Tunley, Counsel for The Corporation of the Town of Aylmer  
[philt@stockwoods.ca](mailto:philt@stockwoods.ca)