Board Staff Interrogatories

EB-2012-0406 / EB-2013-0081

to

Integrated Grain Processors Co-operative Inc. ("IGPC")

Date: October 18, 2013

1. Ref: IGPC Interrogatory #5

In response to IGPC interrogatory #5, NRG has provided a detailed schedule of the costs of the pipeline. The amount that is under dispute between NRG and IGPC totals \$877,938 as per this schedule. Please confirm whether IGPC agrees with the disputed amount noted in the above schedule. If not, please provide the disputed amount as per IGPC and a breakdown similar to the pipeline cost schedule provided by NRG in interrogatory #5.

2. Ref: IGPC Evidence, pages 16-17, June 3, 2013

Please confirm whether IGPC has communicated with NRG in relation to its request for service in order to secure additional gas volumes to meet its expansion plans after June 28, 2013. Please provide a detailed response.

3. Ref: NRG Evidence, page 14, June 3, 2013

NRG in its evidence has provided a breakdown of the legal fees in dispute. Of the total disputed amount of \$244,433, \$94,803 represents legal costs related to the Emergency Motion and \$82,554 has been attributed to the 2008 Motion. Please confirm if IGPC agrees with the above provided breakdown. If not, please provide the costs as per IGPC.

4. Ref: IGPC Evidence, page 4, June 3, 2013

When did IGPC first contact NRG with respect to the Leave to Construct application? Was Mr. Bristoll involved in any negotiations in 2006?