

**AIRD BERLIS**

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

September 7, 2018

SENT VIA EMAIL, COURIER AND RESS

Ms. Kirsten Walli  
Board Secretary  
**Ontario Energy Board**  
2300 Yonge Street  
27<sup>th</sup> Floor, P.O. Box 2319  
Toronto, ON M4P 1E4

Dear Ms. Walli

**Re: EB-2018-0235**  
**Request for Intervenor Status – IGPC Ethanol Inc. and Integrated Grain**

We are counsel to Integrated Grain Processors Co-operative Inc. (“IGPC”).

Please find attached the request for Intervenor Status of IGPC.

If there are any questions, contact the undersigned.

Yours truly,

AIRD & BERLIS LLP



Scott Stoll

SAS/ar  
Encl.

cc. Bruce Brandell (EPCOR)  
Britt Tan (EPCOR)  
Patrick Welsh (Osler, Hoskin & Harcourt LLP)

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**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*,  
S.O. 1998, c.15 (Schedule B);

**AND IN THE MATTER OF** an application by EPCOR Natural Gas Limited Partnership for an Order or Orders pursuant to section 36 of the *Ontario Energy Board Act, 1998* approving or fixing just and reasonable rates and other charges for the sale, distribution, transmission and storage of gas commencing October 1, 2016, October 1, 2017 and October 1, 2018

**INTEGRATED GRAIN PROCESSORS CO-OPERATIVE INC.  
NOTICE OF APPLICATION FOR INTERVENOR STATUS**

1. Integrated Grain Processors Co-operative Inc. and IGPC Ethanol Inc. (together, "**IGPC**") hereby apply for intervenor status in this proceeding.
2. IGPC owns and operates an ethanol facility in the Town of Aylmer. There are more than 700 members, farmers and individual members of the local community that comprise IGPC. IGPC employs more than 65 employees. The ethanol facility is completing an expansion that will increase the need for natural gas during the fall of 2018 and beyond.
3. IGPC is the largest customer of the Applicant, EPCOR Natural Gas Limited Partnership ("**EPCOR**"), and therefore is directly impacted by this Application. IGPC is the sole customer in EPCOR's Rate 6 class.
4. IGPC reserves its rights to file evidence, cross-examine witnesses, make submissions and otherwise fully participate in this proceeding.
5. This Application seeks changes to, and finalization of, rates commencing in October 1, 2016. IGPC is supportive of the change to a fixed rate structure for Rate 6.

6. During the prior rate proceeding filed by Natural Resources Gas Ltd., EB-2016-0236, the Applicant's predecessor, Rate 6 was proposed to receive significant annual reductions in distribution rates (excluded PGTVAs and other variance accounts). IGPC estimates that such a reduction would have resulted in more than \$500,000 in total distribution rate savings for IGPC. Rates have been interim since October 1, 2016 and IGPC opposes any relief that diminishes the amount or in any way restricts, defers, prohibits or extinguishes its rights to recover its overpayment to EPCOR since October 1, 2016.
7. In EB-2016-0351, EPCOR made representations to this Board and customers, including IGPC, that costs of providing distribution service would be reduced as a result of its purchase of the assets of NRG. However, in the present Application EPCOR is seeking a percentage increase in costs. IGPC relied upon the prior proposed rate reduction and the assurance of lower costs, among other factors, for supporting the transfer to EPCOR.
8. IGPC notes that EPCOR (and its predecessor NRG) were last before this Board for a cost of service review in EB-2010-0018. Given the length of time since rebasing, the change of ownership, the extended duration of interim rates and potential changes in rates and rate structures, IGPC recognizes that EPCOR and its customers find themselves in a unique situation.
9. IGPC would note that this Application is comprised of several disparate issues including: (a) percentage rate increase; (b) effective dates; (c) change to a fixed rate for Rate 6; and (d) disposal of the PGTVAs account. Certain of these issues, such as the PGTVAs, IGPC expects will be less contentious than others. As such, IGPC is of the view that certain issues may be more easily and quickly resolved than others allowing parties to resolve the straightforward issues and focus efforts on the more difficult issues.

10. As such, IGPC suggests that a prehearing issues conference/settlement conference may benefit the consideration of this Application in a timely, efficient manner. At this time IGPC does not have any preference on whether there is a written or oral hearing.
11. IGPC notes that certain rates have been requested effective October 1, 2018 which is less than 1 month from the date of this submission. IGPC request that current rates remain interim until at least the Board has finally considered this matter.
12. IGPC will not be seeking a cost award.
13. All communications in respect of this proceeding should be in English and copied to:

Mr. Jim Grey  
Chief Executive Officer  
Integrated Grain Processors Co-operative  
Inc.  
89 Progress Drive, P.O. Box 205  
Aylmer, ON  
N5H 2R9

Tel: (519) 765-2575  
Email: [jgrey@igpc.ca](mailto:jgrey@igpc.ca)

Mr. Scott Stoll  
Aird & Berlis LLP  
Barristers and Solicitors  
Brookfield Place  
181 Bay Street, Suite 1800  
Toronto, ON  
M5J 2T9

Tel: (416) 865-4703  
Fax: (416) 863-1515  
Email: [ssoll@airdberlis.com](mailto:ssoll@airdberlis.com)

**ALL OF WHICH IS RESPECTFULLY SUBMITTED**

Dated: September 7th, 2018

**AIRD & BERLIS LLP**



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**Scott A. Stoll - LSUC No. 45822G**

*(Counsel for Integrated Grain Processors  
Co-operative Inc.)*

**TO: Ontario Energy Board**  
Board Secretary  
2300 Yonge Street  
27<sup>th</sup> Floor, P.O. Box 2319  
Toronto, ON M4P 1E4  
Email: [boardsec@ontarioenergyboard.ca](mailto:boardsec@ontarioenergyboard.ca)

**AND TO: EPCOR Utilities Inc.**  
2000 – 10423 – 101 St. NW  
Edmonton, AB T5H 0E8

Bruce Brandell, Director Commercial Services  
Tel: (780) 412-3720  
Email: [bbrandell@epcor.com](mailto:bbrandell@epcor.com)

Britt Tan, Legal Counsel  
Email: [btan@epcor.com](mailto:btan@epcor.com)

**AND TO: Osler, Hoskin & Harcourt LLP**  
Barristers & Solicitors  
1 First Canadian Place, Suite 6300  
Toronto, ON M5X 1B8

Patrick Welsh  
Tel: (416) 862-5951  
Email: [pwelsh@osler.com](mailto:pwelsh@osler.com)

*(Counsel for EPCOR Natural Gas Limited Partnership)*