

April 17, 2019

**VIA RESS AND COURIER**

Ms. Kirsten Walli  
**ONTARIO ENERGY BOARD**  
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Dear Ms. Walli:

**Re: EB-2018-0263 – EPCOR Natural Gas Limited Partnership (EPCOR) Southern Bruce  
Leave to Construct Application.**

**Industrial Gas Users Association (IGUA) Request for Intervention: EPCOR Response.**

We have received and considered Mr. Welsh's letter of yesterday in response to IGUA's intervention request.

Mr. Welsh expresses concerns about the following passage from our intervention request letter in which we attempted to characterize the scope of IGUA's interest in the instant proceeding to include;

*... the appropriate allocation of costs associated with natural gas system expansions and reinforcements in general, and the appropriate framework for facilitating economic gas system expansions to heretofore unserved communities in particular*

We also pointed out that one or more IGUA members will be served by, and thus has a direct interest in the proposed expansion, and that this would be among the first expansions under the *Expansion of Natural Gas Systems* regulation.

I write to confirm that the extent to which we seek to pursue any cost allocation or gas expansion framework issues would be constrained by the proper scope for a leave to construct proceeding; i.e. economic evaluation of the proposed project (including project costs, economics, rate impacts and external funding allocation).

We trust this assists EPCOR and the Board.

Yours truly,

  
Ian A. Mondrow

c:     B. Brandell (EPCOR)  
       D. Bissoondatt (EPCOR)  
       R. King (Osler, Hoskin & Harcourt LLP)  
       S. Rahbar (IGUA)  
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