

September 16, 2019

VIA RESS AND COURIER

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

Re: EB-2019-0193: Enbridge Gas Inc. (EG) October 1, 2019 QRAM Application.
Industrial Gas Users Association (IGUA) Comments.

We write as legal counsel to IGUA.

IGUA's Position on Proposed Rate Adjustments

IGUA's advisors, Jupiter Energy Advisors Inc. (Jupiter) (Jupiter is a new venture with participation from the previous Aegent Energy Advisors), have reviewed EG's Application for quarterly adjustment of rates (QRAM) for all of the legacy rate zones of Enbridge Gas Distribution and Union Gas Limited, such adjustment to be effective October 1, 2019. Based upon Jupiter's advice, IGUA is satisfied that EG has properly followed the QRAM methodology approved by the OEB's EB-2008-0106 Decision.

IGUA has no objection to approval of EG's application as filed.

Jupiter's review included consideration of EG's proposed correction of an error from the July, 2019 QRAM as identified in an EG letter to the OEB dated June 17, 2019. The error relates to the commodity component of Rider C and within that component the portion relating to gas in inventory revaluation. EG identified an error equating to an under-collection from system supply customers of about \$0.64 million. [Reference Exhibit B, Tab 1, Schedule 1, p. 1 and Exhibit C, Tab 1, Schedule 3, pp. 2-4.] Following Jupiter's review of the proposed correction IGUA has no concerns with it.

Costs

Pursuant to the Board's *Practice Direction on Cost Awards*, IGUA is eligible to apply for a cost award as a party primarily representing the direct interests of ratepayers in relation to regulated gas services. IGUA requests that the Board award it costs reasonably incurred in review of EG's QRAM.

IGUA has, in the past, been consistently awarded modest costs for review of QRAM applications. IGUA respectfully submits that the Board, in making such awards, has recognized some value (commensurate with modest costs) in the independent and informed review of such applications.

IGUA continues to be mindful of the need for efficiency in its regulatory interventions, in particular in respect of relatively non-contentious matters such as is normally the case with QRAM applications. For QRAM reviews, IGUA has retained Jupiter, whose professionals are expert in Ontario gas commercial and regulatory matters, including rate matters in particular. Jupiter conducts a review of the QRAM application as filed, and provides a report to IGUA. Following receipt and review of Jupiter's report, IGUA is either in a position to advise the Board of any concerns or, as is the case in this instance, that it has no cause for objection.

IGUA submits that it has acted responsibly with a view to informing the Board's review and decision on this Application, while maintaining due attention to cost efficiency. On this basis, IGUA is requesting recovery of its costs for participation in this process.

Yours truly,


Ian A. Mondrow

- c. Dr. Shahrzad Rahbar (IGUA)
- Brandon Ott (EG)
- Tania Persad (EG)
- Valerie Young (Jupiter)
- Intervenors of Record (EB-2017-0086; EB-2017-0087)

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