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January 16, 2020

Sent by Electronic Mail, Courier and RESS Electronic Filing

Ms. Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
27-2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Long:

Re: EB-2018-0264: EPCOR Natural Gas Limited Partnership (ENGLP) Southern Bruce Rate Application– Cost Claim Objection

Pursuant to the Ontario Energy Board's ("OEB") Decision and Order (dated November 28, 2019), ENGLP received cost claims related to the above-noted proceeding from the following parties:

- Anwaatin Inc. ("Anwaatin");
- Industrial Gas Users Association ("IGUA");
- School Energy Coalition ("SEC"); and
- Vulnerable energy Consumers Coalition ("VECC").

ENGLP has reviewed and has no concerns with the cost claims filed by SEC and VECC. However, on review of the Anwaatin and IGUA cost claims, ENGLP would like to note certain concerns as detailed below.

1. Anwaatin's cost claim includes time billed to address issues that were either out of scope for a rate proceeding or in excess of the amount of time charged by other similarly situated intervenors.
 - a. Throughout the course of the proceeding, Anwaatin raised issues and proposed conditions that were outside the scope of the rates application and could have been addressed in the prior leave-to-construct application, in which Anwaatin was also an intervenor.
 - b. In terms of costs associated with the "Issues Conference", Anwaatin has claimed significantly more hours (a total of 16.8 hours more) than any other intervenor.
2. The cost claim submitted by IGUA significantly exceeds the claims of all other intervenors (more than double the amount claimed by any other intervenor) and the total hours claimed are disproportionate in comparison. ENGLP suggests that the Board consider IGUA's cost claim in relation to the SEC and VECC claim. Enclosed is a cost comparison table which provides a high-level overview of the cost claims as they relate to interrogatories, the issues conference, ADR and argument.

If you have any questions, please contact the undersigned.

Sincerely,

[Original Filed By:]

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Enclosure (1)

CC: All parties to EB-2018-0264

Comparison of Intervenor Cost Claims				
	Anwaatin	IGUA	VECC	SEC
Interrogatories (hours)	2.60	9.70	7.5	12.9
Issues Conference (hours)	17.8	0	1.5	0
ADR (hours)	17.2	49.4	21.1	24.50
Argument (hours)	14.9	44.40	10.0	7.60
Total Cost (\$)	\$17,295.78	\$38,503.11	\$14,916.00	\$13,150.94