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December 15, 2020

**VIA RESS**

Ms. Christine E. Long  
Registrar  
**ONTARIO ENERGY BOARD**  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

Dear Ms. Long:

**Re: EB-2020-0295: EPCOR Natural Gas Limited Partnership (ENGLP) – Southern Bruce  
January 1, 2021 Quarterly Rate Adjustment Mechanism (QRAM).**

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**Industrial Gas Users Association (IGUA) Comments.**

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We write as legal counsel to IGUA.

IGUA's constituents in ENGLP's South Bruce service territory are served under ENGLP South Bruce Rate 16. Rate 16 is subject to a separate Transportation Variance Account. During ENGLP's October, 2020 QRAM application we were able to confirm with ENGLP that none of its requests in that application impacted, in any way, Rate 16 customers.<sup>1</sup> We assume that the same is true in respect of the current QRAM application.

We note inclusion by ENGLP of a rate schedule for Rate 16 as part of the current application.<sup>2</sup> We would ask ENGLP, in its responding submissions, to;

1. confirm that none of its requests in the instant application impact, in any way, Rate 16 customers; and
2. indicate any changes in the Rate 16 rate schedule filed with this application compared to the existing Rate 16 rate schedule, and explain the basis for any such changes.

As representative of ENGLP's large volume customers IGUA asked that we review the instant application to identify any potential impacts on those ENGLP customers. We have attempted to do

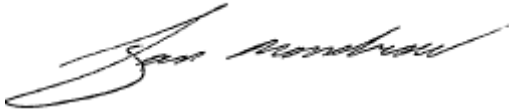
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<sup>1</sup> EB-2020-0206, ENGLP Letter dated October 7, 2020.

<sup>2</sup> Appendix A – Draft Rate Schedules, see PDF pages 27-29.

so efficiently as well as effectively, and accordingly request that IGUA be awarded recovery of its costs reasonably incurred in connection with our review and this brief and focussed submission.

Yours truly,



Ian A. Mondrow

- c. Dr. Shahrzad Rahbar (IGUA)  
Tim Hesselink (ENGLP)  
Kenneth Poon (EPCOR Ontario Utilities Inc.)  
Daniela O`Callaghan (EPCOR Utilities Inc.)  
Arturo Lau (OEB Staff)  
Intervenors of Record (EB-2018-0264; EB-2019-0264)

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