

September 13, 2022

VIA RESS

Ms. Nancy Marconi
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Dear Ms. Marconi:

Re: EB-2022-0219: Enbridge Gas Inc. (EGI) October 1, 2022 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, Utilis Consulting (Utilis), have reviewed EGI'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, 2022. Informed by Utilis' review, we conclude that in deriving base commodity rates EGI has properly followed the QRAM methodology approved by the OEB's EB-2008-0106 Decision.

We note one departure from the prescribed QRAM methodology in continuation of the 24 month period for the PGVA riders established in the April and July, 2022 QRAMS. EGI proposes to retain the 24 month disposition period on the basis that EGI *"has determined that market prices do not provide an opportunity to shorten the 24-month period of the PGVA riders from"* the decisions in respect of these previous QRAMS.

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

Additional Comments

We note the continued inclusion by EGI in this filing of PGVA continuity schedules which break out PGVA principal and interest balances¹, as first directed by the OEB in its decision on EGI's April, 2022 QRAM [EB-2022-0089]. This remains a helpful addition to the QRAM filing, in particular given the recent large deferrals in order to mitigate rate increases.

We also note what appears to be a minor error at Ex A/T2/S1/p2/para. 3 of the application, in referencing a "*proposed rate mitigation plan*" said to be as indicated above. We assume this phrase was inadvertently included in this passage as no rate mitigation plan is proposed in the instant application.

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 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 non-contentious matters such as is normally the case with QRAM applications. For this QRAM review IGUA retained Utilis, whose professionals are expert in Ontario gas regulatory matters, including rate matters in particular. Utilis conducted a review of the application as filed, and provided a report to IGUA. Following receipt and review of Utilis' report, IGUA is in a position to advise the Board that it takes no objection to approval of the application.

¹ ExC/T1/S6 & ExE/T1/S3

IGUA submits that it has acted responsibly with a view to informing both its members and 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)
Asha Patel (EGI)
Tania Persad (EGI)
Brandon Ott (Utilis Consulting Inc.)
All Interested Parties (EB-2008-0106, EB-2019-0137, EB-2022-0072,
EB-2021-0147; EB-2021-0148)

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