

June 14, 2023

**VIA RESS**

Ms. Nancy Marconi  
Registrar  
**ONTARIO ENERGY BOARD**  
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Dear Ms. Marconi:

**Re: EB-2023-0134: Enbridge Gas Inc. (EGI) July 1, 2023 QRAM Application.**  
**Industrial Gas Users Association (IGUA) Comments.**

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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 July 1, 2023. Utilis has confirmed that in deriving base commodity rates EGI has properly followed the QRAM methodology approved by the OEB's EB-2008-0106 Decision.

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

**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 QRAM reviews IGUA has 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.

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)  
Richard Wathy (EGI)  
Tania Persad (EGI)  
Brandon Ott (Utilis Consulting Inc.)  
All Interested Parties (EB-2008-0106, EB-2019-0137, EB-2022-0072, EB-2022-0133)

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