

From: [Office of the Registrar](#)
To: [Jessy Serrao](#)
Subject: FW: Intervention Form: EB-2024-0063 - Industrial Gas Users Association
Date: Thursday, March 7, 2024 3:44:43 PM

Intervention Form

Case Number:

EB-2024-0063

Intervenor Name:

Industrial Gas Users Association

Mandate and Objectives:

Refer to the Frequent Intervenor Form below.

Membership of the Intervenor and Constituency Represented:

Refer to the Frequent Intervenor Form below.

Programs or Activities Carried Out by the Intervenor:

Refer to the Frequent Intervenor Form below.

Governance Structure:

Refer to the Frequent Intervenor Form below.

Representatives:

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.
Refer to the Frequent Intervenor Form below.

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.
Refer to the Frequent Intervenor Form below.

Other Contacts:

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.
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Frequent Intervenor Form:

<https://www.rds.oeb.ca/CMWebDrawer/Record/801323/File/document>

OEB Proceedings:

IGUA has been involved in a number of OEB proceedings in the past 2 years, of which the following are the most recent:

BCA Framework for Addressing Electricity System Needs (EB-2023-0125)
OEB Consultation to Review EGI's GSP 2023 Annual Update (EB-2023-0072)
OEB re EGI's 2021 Vector Contracting Decision (EB-2023-0326)
Regulatory Framework Workshop (EB-2022-0302)
EGI 2024 Rebasing and IRM Application (EB-2022-0200)

Issues:

IGUA's members are gas delivery services customers, and their rates will be directly impacted by the cost of capital decisions and directions made by the Board in this proceeding.

Policy Interests:

N/A

Hearings:

The Board's Notice indicates expectations for an oral hearing. IGUA supports this approach, in particular given the anticipated importance of expert analysis and opinion evidence to the topics at hand and the potential for differing expert views.

Evidence:

In Enbridge Gas Inc.'s most recent (for the 2024 test year) rebasing proceeding IGUA took the lead among ratepayer and interest group intervenors on cost of capital issues, including the sponsoring of expert evidence on the equity thickness topic engaged in that application. IGUA is considering sponsoring evidence in this proceeding from a cost of capital expert and will make a determination on whether it will request leave to sponsor such evidence as the matter progresses and the Board provides further procedural direction. Should IGUA seek leave to file evidence we will provide the required information on the scope and expected cost of such evidence.

Coordination with Other Intervenors:

In Enbridge Gas Inc.'s most recent (for the 2024 test year) rebasing proceeding IGUA took the lead among customer intervenors on cost of capital issues, including in sponsoring and presenting expert evidence and in cross-examination of EGI's and OEB Staff's cost of capital witnesses/experts. We anticipate similar involvement and co-ordination in the instant process.

Cost Awards:

IGUA also hereby requests that it be determined eligible for recovery of its reasonably incurred costs of its interventions in these Applications.

As a party primarily representing the direct interests of industrial consumers (i.e. ratepayers) in relation to regulated services, IGUA has in the past been determined to be eligible for cost awards pursuant to section 3.03(a) of the Board's Practice Direction on Cost Awards.

Language Preference:

No