



Intervention Form

Case Number:

EB-2024-0200

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.

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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/843770/File/document>

OEB Proceedings:

EGI Rebasing Motion for OEB Review (EB-2024-0078)

OEB Motion re Cost of Capital Review (EB-2024-0063)

EGI 2024-Rebasing and IRM Application (EB-2024-0111) - Phase 2

Note: All intervention applications listed were granted.

Issues:

As representative of EGI's largest customers, IGUA has an interest in both the costs and value of this project to customers.

In addition to this general interest, in the EB-2020-0293 matter which reviewed EGI's initial application for approval of this project, IGUA expressed concerns on behalf of its members regarding the risk of underutilization of (in particular new) natural gas infrastructure and the manifestation of that risk in higher delivered natural gas costs for remaining captive customers. On the other hand, IGUA noted the dependence of its members on a reliable and cost-effective natural gas system, and that the decarbonization efforts of a number of its members depend on using more, rather than less, gas, for some time to come. In EGI's recent rate rebasing application (EB-2022-0200) IGUA sponsored evidence regarding, and pursued through its intervention, the importance of sound natural gas system planning and analysis in

support thereof, in particular in light of energy transition concerns and potential impacts on the future of the natural gas system.

In the current application, and in response to the Board's decision in EB-2020-0293, EGI has expressly addressed energy transition-related planning concerns. IGUA intends to consider and fully participate in review of EGI's revised approach to assessing the need for, and risks associated with, this project in light of those concerns and in response to the Board's directions in the previous LTC involving this pipeline and in the decision on EGI's Phase 1 rate rebasing application.

Policy Interests:

Not applicable

Hearings:

EGI has requested a written hearing.

EGI's filing addresses a number of new approaches which the applicant has taken to its assessment of risks and requirements related to the proposed project, in response to previous direction provided by the Board in the previous leave to construct application related to the subject pipeline and in the recent Phase 1 rebasing application decision. These new and important issues suggest the appropriateness of making provision for an oral hearing, at least pending reassessment following development of the issues and record herein through the discovery and any supplemental evidentiary phase of the process.

Evidence:

We continue to review EGI's application and advise IGUA, and it is premature to indicate whether IGUA intends to file evidence in this proceeding or not.

Coordination with Other Intervenors:

IGUA regularly engages in discussions with other intervenors, and expects to continue this practice throughout this proceeding. The objective of those discussions is always to share views and co-ordinate activities, in order to preclude undue duplication and facilitate both an efficient and an effective process.

Cost Awards:

IGUA is applying for cost award eligibility.

As representative of EGI's largest customers, IGUA has repeatedly been found to be eligible for a cost award pursuant to paragraph 3.03(a) of the Board's Practice Direction on Cost Awards as a party which primarily represents the direct interests of consumers in relation to services regulated by the Board.

Language Preference:

IGUA will participate in the hearing in English.