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April 12, 2019

## VIA EMAIL & ORIGINAL TO FOLLOW

Public Utilities Board of Manitoba 400 - 330 Portage Avenue Winnipeg, MB R3C OC4

Attention: Ms. Rachel McMillin, Assistant Associate Secretary

Dear Ms. McMillin:

Re:

Centra Gas Manitoba Inc. (Centra) 2019/20 General Rate Application

Our Matter No. 0163483 AFH

The Public Utilities Board ("PUB" or "Board") in Order No. 24/19 dated February 20, 2019, requested on page 22 that:

Industrial Gas Users is to notify the Board in writing prior to the date for Intervener Information Requests of Centra, which of the other approved Interveners it is leading and on which issues.

This correspondence provides an update on behalf of the Industrial Gas Users ("IGU") on the matter of common issues amongst interveners related to the balancing fee in the 2019/20 Centra Gas General Rate Application ("GRA").

## **Activities to Date**

The PUB approved the following other separate interveners who listed the balancing fee as a major issue in the 2019/20 Centra Gas GRA; BP Canada Energy Group ULC; Bunge Canada; Koch Fertilizer Canada, ULC; McCain Foods (Canada); Richardson International Limited; and Simplot Canada (II) Limited.

In regards to the separate intervention of Koch Fertilizer Canada, ULC and Simplot Canada (II) Limited, who are both also members of the IGU group, both intend to maintain their individual intervener status but are working collaboratively with the IGU. Both have agreed that the IGU intervention will take lead on the balancing fee issue, as well as cost allocation, rate design and Terms and Conditions of service. Koch Fertilizer has retained



separate legal counsel and will participate in the GRA separately on matters to the extent its individual position may diverge from the group. At present, it is the IGU's understanding that Simplot does not intend to intervene separately in the GRA but plans to reserve its right to its intervention status in case its individual position diverges from the group.

Regarding the other approved separate interveners, the following activities have taken place to coordinate intervention and reduce duplication:

- BP Canada Energy Group ULC The IGU has been in communication with BP Canada and has worked together to date on the balancing fee issue, including in review of the issue and in developing Information Requests to date. BP and the IGU plan to continue to maintain communication on this topic with IGU taking the lead.
- Bunge Canada The IGU has been in communication with Bunge Canada and has
  discussed efficiencies in process related to intervening on the balancing fee issue.
  Where positions align, both parties are prepared to continue working together and
  communications are ongoing on this.
- McCain Foods (Canada) IGU made contact with representatives from McCain Foods early on in the intervention process and discussed related issues and intervention. Since the Order 24/19, IGU has reached out to McCain Foods representatives several times and has had discussions with legal counsel on related key issues, including Centra's proposed balancing fee and management of natural gas daily balancing. The IGU plans to continue conversations with McCain Foods to minimize duplication.
- Richardson International Limited In discussion with representatives for Richardson International Limited, it has been communicated that Richardson does not intend at this time to take an active role in the Centra Gas GRA. Representatives on gas supply for Richardson are working with the IGU on the balancing fee issue to date and intend to continue collaboration where positions align moving forward.

The IGU has taken considerable steps to communicate with separate industrial interveners regarding the group priorities and case strategy on the balancing fee issue and on other areas of concern that impact industrial customers in Centra's proposal. The group plans to continue to communicate with parties who have been granted separate intervention status in this GRA to reduce duplication and provide time and cost efficiencies throughout the hearing process.



If there are any questions with respect to the IGU's submission, please feel free to contact the writer at your convenience.

Yours truly,

THOMPSON DORFMAN SWEATMAN LLP

Per: antoine F. Hacault

Antoine F. Hacault\*

AFH

cc:
Bob Peters, Board Counsel
Dayna Steinfeld, Board Counsel
Brent Czarnecki, Centra Gas Counsel
All Intervenors of Record
\*Services provided through A. F. Hacault Law Corporation