

INTERVENER APPLICATION FORM

Application re Hearing:			
Name of Prospective Intervener (Organization Name or Individual):			
Prospective Intervener Contact Information			
Organization or Individual Address:			
Organization Contact Person(s) (if applicable):			
Contact Information:	Business:		Other Phone:
	Fax Number:		Email:
Representative Contact Information:			
Counsel or Representative Name(s):			
Organization (if different from above) :			
Address (if different from above):			
Contact Information (if different from above):	Business:		Other Phone:
	Fax Number:		Email:
Counsel Seniority:			
Years of Experience	_____ Years	Tariff Rate	\$ _____
Also representing (if applicable):			

Additional Information

(For organizations only) Please describe the mandate of your organization and provide a description of the membership, including the number of members. Please also confirm whether the organization's intervention in this proceeding is supported by a resolution of the governing body, if any. Please enclose the resolution, if any, with your Application, along with supporting documentation of your mandate and membership

Please state your reasons for intervening in this proceeding:

Please state how you are directly affected by the Board's decision in this matter:

Please explain whether and how you represent a substantial number of ratepayers that are otherwise not represented on issues that are within the scope of this proceeding:

Please describe your experience, information, or expertise relevant to this matter that would contribute to the Board's decision making, including any other prior interventions in regulatory matters before this Board or other decision-makers:

Please list the key issues you intend to address in the proceeding. Please be specific.		
Do you intend to participate fully and actively, including attendance at hearings, submission of evidence, and testing of evidence and cross examination of witnesses? If yes, please describe your intended participation.		
Do you intend to request an award of costs for your participation? Please explain how you meet the criteria for an award of costs.		
Do you intend to retain experts or consultants? If yes, please attach copies of the <i>curriculum vitae</i> for any expert and/or consultant, as well as the following:		
Expert Consultant #1:		
Name:	Experience	Evidence to be provided on issues in scope:
	_____Years	
Telephone #:	Tariff Rate:	
	\$_____	
Address and Email:	Firm or Organization:	Brief explanation of experience relevant to evidence to be provided:

Expert Consultant #2:		
Name:	Experience:	Evidence to be provided on issues in scope:
	_____Years	
Telephone #:	Tariff Rate:	
	\$_____	
Address and Email:	Firm or organization:	Brief explanation of experience relevant to evidence to be provided:
Expert Consultant #3:		
Name:	Years of Experience:	Evidence to be provided on issues in scope:
	_____Years	
Telephone #:	Tariff Rate:	
	\$_____	
Address and Email:	Firm or organization:	Brief explanation of experience relevant to evidence to be provided:

Do you intend to provide evidence from witnesses other than experts and/or consultants? If yes, please provide:	
Witness #1:	
Name:	Evidence to be provided on issues in scope:
Email:	Brief explanation of relevant experience and/or knowledge to issues in scope:
Address and Phone number:	
Do you intent to seek approval for any other form of participation or provision of evidence, including for which you intend to seek an award of costs? If yes, please provide details and an explanation of the relation to issues in scope in the proceeding.	

Additional Information - Attachment

(For organizations only) Please describe the mandate of your organization and provide a description of the membership, including the number of members. Please also confirm whether the organization's intervention in this proceeding is supported by a resolution of the governing body, if any. Please enclose the resolution, if any, with your Application, along with supporting documentation of your mandate and membership.

The purpose of the Industrial Gas Users is to work together on issues of common concern related to natural gas rates in Manitoba. The association's key concerns related to natural gas are to ensure rates reflect the cost to provide service, are fair and reasonable, and stable and predictable.

IGU is an informal association of companies who are substantial users of natural gas. IGU members at this time include:

- Gerdau Long Steel North America – Manitoba Mill;
- Koch Fertilizer Canada ULC;
- Maple Leaf Foods; and
- Simplot Canada (II) Limited (Simplot)

IGU continues discussions with a number of other potential members.

Beyond members proper, IGU is undertaking active engagement with other industrial stakeholders and associations on natural gas matters. As a result, IGU's intervention will benefit industrial customers beyond the active membership, and additional active members may be recruited. IGU is an informal association and does not pass resolutions.

Please state your reasons for intervening in this proceeding:

Fundamentally, IGU's intervention will seek to ensure Centra Gas' rates are cost-based and fairly reflect the cost to serve each customer class. IGU companies are long-term economic contributors to Manitoba, and as such require stable and predictable rates over the long-term. IGU anticipates reviewing elements of Centra's proposed revenue requirement forecast, cost allocation methods, and rate design proposals. IGU also proposes to review customer contribution methodology to the extent it is included in scope (including within cost allocation methodology) and the Terms and Conditions of service as under the jurisdiction of the Public Utilities Board as per *the Public Utilities Act*. The IGU will focus its intervention on the costs, rates and riders charged to industrial gas users, predominantly the Sales Service and T-Service and a Special Contract class.

Please state how you are directly affected by the Board's decision in this matter:

This proceeding will impact the rates charged for service in the test year, and will establish methodological considerations that may impact rates on a longer-term basis. IGU members, as industrial customers, are directly impacted by increased rates for natural gas service. The

proposed rate increases will increase operating costs, which IGU members, generally cannot flow through in prices, as these are set by market, economic and/or contract conditions.

Additionally, the Board's decision may establish how future rate proceedings unfold in Manitoba. Industrials operate under long-lead planning cycles for operational and investment decisions, requiring predictability in rate setting.

Please explain whether and how you represent a substantial number of ratepayers that are otherwise not represented on issues that are within the scope of this proceeding:

IGU's core membership represents a substantial portion of industrial customer natural gas service in Manitoba using both Sales Service and T-Service. IGU is still in discussions with other impacted industrial gas users to potentially join in this intervention. IGU will also work more broadly to reach out to other industrial customers and associations who are not formal members, to ensure they have accurate information about how the proposed rate changes will affect them. IGU is interested in collaborating with other industrial gas users with similar interests.

Please describe your experience, information, or expertise relevant to this matter that would contribute to the Board's decision making, including any other prior interventions in regulatory matters before this Board or other decision-makers:

Members of the IGU group have considerable experience intervening in Manitoba rate proceedings and in regulatory proceedings in other Canadian and US jurisdictions. This includes some previous Centra Gas proceedings such as the original acquisition by Manitoba Hydro.

Please list the key issues you intend to address in the proceeding. Please be specific.

While it is still preliminary, IGU intends to focus its intervention on key economic and financial conditions that impact revenue requirement. IGU also intends to review Centra's proposed cost allocation methods, rate design and Terms and Conditions of Service. Specific terms of the industrial rate designs are of particular concern, such as charges related to daily imbalance and the heating value deferral true-up.

Do you intend to request an award of costs for your participation? Please explain how you meet the criteria for an award of costs.

Yes, IGU intends to request an award of costs for participation. Per the PUB's Intervener Cost Policy for the Centra Gas 2019/20 General Rate Application Section 3.0, the eligibility criteria provide that the Board may award costs to any intervener who has:

- (a) made a significant contribution that is relevant to the proceeding and contributed to a better understanding, by all parties, of the issues before the Board;
- (b) participated in the hearing in a responsible manner and cooperated with other Interveners who have common objectives in the outcome of the proceedings in order to avoid a duplication of intervention;
- (c) represented interests beyond their sole business interest; and
- (d) a substantial interest in the outcome of the proceeding and represents the interests of a substantial number of ratepayers.

Regarding part (a), IGU members have participated in previous electricity rate hearings as well as the Centra Gas Acquisition Hearing and have demonstrated that their intervention is focused on matters directly impacting industrial rates and makes a significant contribution in rate applications. IGU intends to work with qualified established legal and consulting professionals familiar to the PUB, whose past experience has been recognized to be a significant contribution to the PUB's deliberations.

For part (b), IGU intends to coordinate with other intervenors on a topic-by-topic basis, where interests are aligned, to avoid duplication of effort.

For part (c) IGU's interests are not solely related to members' business interests, but also ensuring the long-term sustainability of Manitoba industry and ratepayers generally, and balancing impacts on the Manitoba economy in both the short- and long-term. IGU's interests are not on focused on setting the lowest rate possible today, but rather in maintaining reliable service at fair and predictable rates set based on the cost of service.

For part (d) IGU's membership includes a substantial number of industrial customers representing different industries operating in Manitoba. Many of the companies are in smaller and rural settings, and often are among the largest employers in their respective communities. IGU members have a substantial interest in the outcome of the proceeding, and IGU will undertake outreach to other industrials to ensure that its intervention is broadly representative of industrial concerns. In addition, IGU continues to reach out to other industrial customers for potentially joining the group's intervention in this proceeding. IGU proposes to provide an update on group membership at the upcoming pre-hearing conference.

As the process for this proceeding has not yet been established, IGU proposes to submit a detailed budget for consideration by the PUB following the pre-hearing conference and a PUB Decision on a preliminary proceeding schedule. As part of the budget submission, IGU will confirm who it intends to retain as expert witnesses.