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Via email: rachel.mcmillin@gov.mb.ca

April 12, 2019

Rachel McMillin
Assistant Associate Secretary
The Public Utilities Board
400-330 Portage Avenue
Winnipeg, Manitoba
R3C 0C4

Dear Ms. McMillan:

**Re: Koch Fertilizer Canada, ULC
Participation in Centra Gas Manitoba Inc.'s 2019/20 GRA**

In accordance with PUB Order 24/19, we write on behalf of Koch Fertilizer Canada, ULC (“**Koch**”) to advise the Board of Koch’s current plans for participation in the hearing.

As you are aware, Koch is intervening individually and is also a member of the Industrial Gas Users (“**IGU**”). Koch is taking this approach due to the very significant rate increase (proposed to be more than 60%) for its plant located in Brandon, Manitoba.

Based on the limited information available today, the proposed rate increase appears to be disproportionately large for Koch and will significantly increase Koch’s operating costs and impact Koch’s long-term competitiveness. Koch is directly and materially interested in the areas of cost of service and allocation of costs to the various customers classes served by Centra.

We’re mindful that Koch is expected to collaborate with other intervenors where feasible and to avoid duplication where possible. In that spirit, and at this time, Koch plans to collaborate on all issues that it is aligned on with the IGU. Koch has worked with the IGU for the purposes of filing its initial IR’s. Koch can also confirm at this stage that it will work with the IGU on the balancing fee issue. At this point Koch is hopeful that it will be able to work with IGU on all issues.

However, it is very possible that, after receiving additional information from Centra or others that Koch will find its interests diverging from those of the other IGU members. This is particularly so as it relates to cost allocation and other cost of service issues.

Koch's further participation will be determined as the hearing steps progress and more information becomes available such that Koch and its advisors are better able to assess the nature and level of hearing participation that may be necessary in order to adequately protect Koch's interests and assist the Board in contributing to a robust, transparent and evidence based decision making process.

Yours very truly,

LAWSON LUNDELL LLP

<Original signed by>

Lewis L. Manning*

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