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It is important for the Commission to appreciate that these meetings were trying to provide an opportunity for a large number of parties to express their views in a very compressed time frame. While some parties disregarded the direction for brevity in their remarks, IGCAA took this direction seriously and kept its comments brief and to the point. To this end, I did not repeat previous comments made by other parties that IGCAA supports and would have made if they hadn't already been mentioned. In particular, IGCAA considers the comments made by IPCAA, the Rate 13/D410 group and by the City in Calgary to have presented a number of similar perspectives as IGCAA holds.

These comments include, but are not limited to, the following:

- Cost recovery should be based primarily on the contribution an intervener has made, not some other surrogate classification of intervener.
- Associations have and continue to provide valuable contributions to the regulatory process and advocate a legitimate public interest for the Commission to consider.
- Association members, as rate payers, pay a large proportion of the utility rates (and therefore the regulatory costs) and it would be unfair to categorically disallow cost recovery for a representative of one customer class because its members individually have a commercial interest.
- The current cost-recovery provisions provide considerable discipline and all the discretion the AUC requires to disallow costs that they determine to have not added value or that represent a single corporate business interest.