

March 16, 2020

VIA RESS AND COURIER

Ms. Christine E. Long
Registrar and Board Secretary
ONTARIO ENERGY BOARD
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T1022025

Dear Ms. Long:

Re: EB-2020-0066 – Enbridge Gas Inc. (EG) Voluntary RNG Program Application.

Industrial Gas Users Association (IGUA) Request for Intervention.

We write as legal counsel to IGUA to request that IGUA be granted intervenor status in the captioned proceeding.

Description of IGUA

IGUA is an association of industrial companies located in the Canadian provinces of Ontario and Québec, who use natural gas in their industrial operations. IGUA was first organized in 1973 and it provides a coordinated and effective public policy and regulatory voice for those industrial firms depending on natural gas as a fuel or feedstock. IGUA has become the recognized voice representing the industrial user of natural gas before regulatory boards and governments at both the provincial and national levels.

The Association's activities are guided by a 15 member Board of Directors, constituted to assure that each industrial sector and geographic region is represented. The Board of Directors has regularly scheduled meetings at least six times each year. A full time President and other staff are based in a permanent office in Ottawa.

Through regulatory intervention, government advocacy, marketing, promotion, partnerships, education and outreach, IGUA successfully represents industrial gas users. Our mission is to be the voice of our members within the natural gas industry through intervention, advocacy, and partnerships.

Nature and Scope of IGUA's Intended Participation

IGUA's members have a high level of interest in RNG, and IGUA has been an active participant in RNG related regulatory and policy matters in Quebec and Ontario. In respect of RNG in general, IGUA has advocated; i) a market based approach to supply; ii) a voluntary approach to demand; iii) market based vs. regulated contracting and pricing arrangements; and iv) avoidance of cross-subsidization. IGUA seeks intervention in this matter, which is for review of an early LNG facilitating proposal, given the general interest of its members in development of RNG on the basis outlined above.

Our initial review of EG's application indicates general consistency with the foregoing policy. We also recognize that EG's proposed voluntary program is designed for general service system gas users and not large industrial customers. Subject to the introduction of other issues or approaches by participating parties, we anticipate limited interrogatories in furtherance of a clear record on the scope of the proposal including the treatment and recovery of costs associated therewith, and subsequent engagement at a level consistent with IGUA's interests and the impact of EG's proposal on IGUA's members.

Written or Oral Hearing

Subject to completion of written discoveries this matter seems one in which the facts and the applicants' position are relatively clear and thus one appropriately addressed through a written process.

Intention to Seek an Award of Costs

IGUA also hereby requests that it be determined eligible for recovery of its reasonably incurred costs of its interventions in these Applications.

As a party primarily representing the direct interests of industrial consumers (i.e. ratepayers) in relation to regulated services, IGUA has in the past been determined to be eligible for cost awards pursuant to section 3.03(a) of the Board's *Practice Direction on Cost Awards*.

Request for Written Evidence and Contact Information

IGUA requests that copies of written evidence and all circulated correspondence related to these matters be directed to it as follows:

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We have electronic copies of the pre-filed materials and do not require hard copies.

Yours truly,



Ian A. Mondrow

c: B. Ott (EGI)
D. Stevens (Aird & Berlis LLP)
S. Rahbar (IGUA)

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