

March 10, 2009

Kirsten Walli, Board Secretary
ONTARIO ENERGY BOARD
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E5

Dear Ms. Walli:

Re: EB-2009-0018 - Enbridge Gas Distribution Inc.'s (EGD) April 1, 2009 QRAM Application.

We write as legal counsel to the Industrial Gas Users Association (IGUA).

IGUA's advisors, Aagent Energy Advisors Inc. (Aagent), have reviewed EGD's Application for quarterly adjustment of rates (QRAM) to be effective April 1st, 2009. Aagent reviewed the progression of rates evidenced in Exhibit Q2-3-4-3 herein directly with EGD personnel. As a result of their review of the Application materials and discussions with EGD, Aagent has advised IGUA that Aagent is satisfied that EGD's Application;

1. follows the OEB approved QRAM methodology; and
2. has appropriately incorporated the OEB's Order implementing the Board's decision on Phase 1 of EGD's 2009 rate application (EB-2008-0219).

IGUA has no objection to approval of EGD's application as filed.

Costs.

Pursuant to the Board's *Practice Direction on Cost Awards*, IGUA is eligible to apply for a cost award as a party primarily representing the direct interests of ratepayers in relation to regulated gas services. IGUA requests that the Board award it costs reasonably incurred in review of EGD's QRAM.

IGUA reviews QRAM applications as a matter of course, in order to properly discharge its mandate and responsibility to protect its members' interests in respect of gas regulatory matters, including appropriate application of the Board approved quarterly rate adjustment mechanism. Where warranted, IGUA has in the past offered comment on the form or substance of the gas distributors' QRAM applications. In this instance, IGUA has no further comment to offer.

IGUA has, in the past, been awarded modest costs for review of QRAM applications. In making such awards IGUA respectfully submits that the Board has recognized some value (commensurate with modest costs) in the independent and informed review of such applications that IGUA provides.

IGUA continues to be mindful of the need for efficiency in its regulatory interventions, in particular in respect of relatively non-contentious matters such as is normally the case with QRAM applications. For QRAM reviews, IGUA has retained Aegent, whose professionals are expert in Ontario gas commercial and regulatory matters, including rate matters in particular. Aegent conducts a cursory review of the QRAM application as filed, makes inquiries as appropriate of utility personnel, and provides a report to IGUA. Provided that Aegent's report does not indicate any concerns with either the application of the QRAM protocols or the rate outcome, IGUA is in a position to advise the Board that it has no cause for objection, as is the case in respect of the instant application.

IGUA submits that it has acted responsibly with a view to informing the Board's review and decision on this application, while maintaining due attention to cost efficiency. On this basis, IGUA is requesting recovery of its costs for participation in this process.

Sincerely,
MACLEOD DIXON LLP



Ian A. Mondrow

- c. Murray Newton, IGUA
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Tania Persaud, EGD
Norm Ryckman, EGD
Valerie Young, AEGENT ENERGY ADVISORS
Interested Parties (as listed in the Application)