

March 24, 2010

Ms. Kirsten Walli, Board Secretary  
**ONTARIO ENERGY BOARD**  
2300 Yonge Street, 27th Floor  
Toronto ON M4P 1E4

Dear Ms. Walli:

**Re: EB-2010-0060: Consultation on Distribution Revenue Decoupling.**  
**IGUA Request for Cost Eligibility.**

We write as legal counsel to IGUA.

Pursuant to the Board's March 22, 2010 Notice herein, IGUA hereby requests that it be determined eligible for recovery of its reasonably incurred costs of participation in this consultation, in accord with directions regarding costs herein provided by the Board from time to time.

IGUA is an association of industrial companies who use natural gas in their industrial operations located in the Canadian provinces of Manitoba, Ontario and Québec. IGUA was first organized in 1973, and 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.

As a party primarily representing the direct interests of industrial gas consumers (i.e. gas 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*.

IGUA has been an active participant in gas distribution rate proceedings and in policy consultations relating to gas distribution. IGUA has represented the interests of industrial gas ratepayers during development and through continuing application by Ontario's gas distributors of demand side management programs, including the lost revenue adjustment mechanisms (LRAMs) related to those programs. IGUA has a continuing interest in the regulatory framework that governs determination of gas distributor revenue requirements, including those aspects of the framework that are intended to take account of anticipated decreases in volumes as a result of conservation programming of the distributors and/or others.

IGUA intends to participate in the Stakeholder Conference scheduled for April 19<sup>th</sup>, and to make considered written comments reflecting the industrial gas ratepayer perspective on the issues raised in this consultation. IGUA anticipates participating as well in any further steps in this consultation process as and when convened by the Board.

Yours truly,  
**MACLEOD DIXON LLP**



Ian A. Mondrow

c. Murray Newton, IGUA

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