

April 19, 2010

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

Dear Ms. Walli:

Re: EB-2010-0155: Union Gas Limited STAR Compliance Application.
IGUA Request for Cost Eligibility.

We write as legal counsel to IGUA.

Pursuant to the Board's April 9, 2010 Notice herein, IGUA hereby requests that it be determined eligible for recovery of its reasonably incurred costs of participation in this proceeding.

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 participated actively in the STAR rulemaking proceedings.

IGUA has a continuing interest in the regulatory framework that governs access to gas storage and transportation facilities and services in Ontario, and in Union's compliance with that framework.

Yours truly,

MACLEOD DIXON LLP


Ian A. Mondrow

c. Murray Newton - IGUA
Karen Hockin - Union Gas
Sharon Wong - Blake, Cassels & Graydon

174026.v1