

September 15, 2010

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

Dear Ms. Walli:

**Re: EB-2010-0258: Enbridge Gas Distribution Inc's (EGD) October 1, 2010 QRAM Application.**

**Comments of the Industrial Gas Users Association (IGUA).**

We write as legal counsel to IGUA.

IGUA's advisors, Aagent Energy Advisors Inc. (Aagent), have reviewed EGD's Application for quarterly adjustment of rates (QRAM) to be effective October 1, 2010. In addition to reviewing delivery rate changes resulting from changes in gas costs, Aagent has considered the proposed changes to EGD's terms and conditions of service and rate schedules to reflect the Board's findings in EB-2010-0231 (the system reliability proceeding) and EB-2010-0177 (the rate 331 STAR compliance proceeding).

Based upon Aagent's advice, IGUA is satisfied that EGD has properly followed the QRAM methodology approved by the OEB in its EB-2008-0106 Decision, and has properly incorporated changes to its terms and conditions of service and rate schedules to reflect determinations by the Board in the other two proceedings noted above.

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 Aagent, whose professionals are expert in Ontario gas commercial and regulatory matters, including rate matters in particular. Aagent conducts a review of the QRAM application as filed, and provides a report to IGUA. Provided that Aagent'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.

Yours truly,  
**MACLEOD DIXON LLP**



Ian A. Mondrow

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Valerie Young, AEGENT ENERGY ADVISORS  
Interested Parties (as listed in the application)