

October 5, 2010

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

Dear Ms. Walli:

**Re: EB-2010-0148: Union Gas Limited 2011 Rates Application.**

**Industrial Gas Users Association (IGUA) Letter of Intervention.**

We write as legal counsel to IGUA.

**Application for Intervenor Status.**

IGUA is in receipt of the Board's Notice of Application in the captioned proceeding dated September 22, 2010. We hereby request, on behalf of IGUA, that the Board accept this application for intervenor status.

**Description of IGUA.**

IGUA is an association of industrial companies located in the Canadian provinces of Manitoba, 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.

**Nature and Scope of IGUA's Intended Participation.**

IGUA has historically been an active participant in gas distribution rate setting proceedings. IGUA was centrally involved in the proceedings that set the incentive regulation mechanism (IRM) regimes for each of EGD and Union Gas Limited, and has remained active in rate setting proceedings under those regimes.

IGUA is reviewing Union's recently filed evidence in order to determine whether it has any particular areas of concern.

**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 intervention herein.

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 this matter be directed to it as follows:

Ian Mondrow, Counsel  
MACLEOD DIXON, LLP  
Toronto Dominion Centre  
500-100 Wellington Street West  
Toronto, ON M5K 1H1

Phone: (416) 203 4435  
Fax: (416) 360 8277  
[ian.mondrow@macleoddixon.com](mailto:ian.mondrow@macleoddixon.com)

Murray Newton, President  
INDUSTRIAL GAS USERS ASSOCIATION  
99 Metcalfe Street, Suite 1201  
Ottawa ON K1P 6L7

Phone: (613) 236 8021  
Fax: (613) 230 9531  
[mnewton@igua.ca](mailto:mnewton@igua.ca)

Your truly,  
**MACLEOD DIXON LLP**



Ian A. Mondrow

c. Murray Newton, IGUA  
Chris Ripley, Union  
Crawford Smith, Torys