

December 24, 2010

**VIA RESS AND COURIER**

Kirsten Walli, Board Secretary  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, Ontario  
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Dear Ms. Walli:

**Re: EB-2010-0232 – Enbridge Gas Distribution Inc. Application for exemptions from section 2.2.4 of the *Affiliate Relationships Code for Gas Utilities*.**

**Industrial Gas Users Association (IGUA) Request for Intervention.**

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We write as legal counsel to IGUA.

**Application for Intervenor Status**

Pursuant to the Board's Notice of Application and Procedural Order No. 1, herein, IGUA hereby applies for intervenor status in this application.

**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 provides a coordinated 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

EGD has filed the instant application "to supplement"<sup>1</sup> its requests in the EB-2008-0275 proceeding. EGD now seeks to continue its existing operational relationship with its affiliate, Gazifère Inc, and to extend the provisions of certain operational services to other Enbridge wind farms.

IGUA was an intervenor in the EB-2008-0274 proceeding which EGD seeks to "supplement". IGUA participated actively in that earlier proceeding, and provided submissions to the Board on EGD's exemption requests therein. IGUA intends to be similarly active in this proceeding, reviewing EGD's application, seeking additional information as warranted, and providing the Board with its views on EGD's requests.

## 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 gas 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 Materials and Contact Information

IGUA requests that copies of written evidence and all circulated correspondence related to this matter be directed to it as follows:

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Yours truly,



Ian Mondrow

c: Norm Ryckman, EGD  
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<sup>1</sup> Application, paragraph 1