

March 9, 2011

**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-2011-0052 – Preliminary Assessment of Incentive Regulation Plans of the Natural Gas Utilities**

**Industrial Gas Users Association (IGUA) Intent to Participate and Request for Cost Eligibility**

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We are in receipt of the Board's Announcement dated February 25<sup>th</sup>, herein. We write as counsel to IGUA to indicate IGUA's intention to participate in this process, and to request that IGUA be determined eligible for recovery of its reasonably incurred participation costs.

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.

IGUA was active in the proceeding which established the current gas distribution incentive regulation plans, and has been active in the rate related proceedings flowing from those plans.

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*.

The Board requested in its Announcement package that participants requesting cost eligibility indicate in their request whether costs for separate expert submissions should be provided for in this consultation. IGUA does not currently intend to pursue retainer of an expert. However, IGUA reserves it's position in this respect pending review of the report to be issued by the consultant retained by the Board.

Yours truly,



Ian Mondrow

cc: Murray Newton (IGUA)  
Norm Ryckman (EGD)  
Mark Kitchen (Union)

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