

September 29, 2011

**VIA RESS AND COURIER**

Ms. Kirsten Walli  
**ONTARIO ENERGY BOARD**  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli:

**Re: EB-2011-0277 – Enbridge Gas Distribution Inc. (EGD) 2012 Rates Application**

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

Further to the Board's Notice of Application herein, we write as legal counsel to IGUA to request that IGUA be granted intervenor status herein.

**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 will review EGD's evidence when filed and will then be able to determine with more particularity its interest in this proceeding. IGUA notes from EGD's Application that EGD has requested a Z factor related to pipeline integrity requirements, and IGUA expects to further inquire regarding, and consider, this request.

**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.

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File No. T988126



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:

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Yours truly,

*iam*: Ian A. Mondrow

c: Murray Newton (IGUA)  
Norm Ryckman (EGD)  
Fred Cass (Aird & Berlis LLP)

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