

October 19, 2011

VIA RESS AND COURIER

Ms. Kirsten Walli
ONTARIO ENERGY BOARD
P.O. Box 2319, 27th Floor
2300 Yonge Street
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File No. T988122

Dear Ms. Walli:

Re: EB-2011-0327 – Union Gas Limited 2012-2014 Demand Side Management (DSM) Plan

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 intervention on behalf of our client.

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 an established history of engagement in rate and policy matters related to Ontario's two main natural gas distributors, including in particular, in the context of this application, DSM policy development and program approval applications. Much of Union's DSM savings come from the industrial customer segment, and a significant portion of Union's DSM budget is funded by its industrial customers.

IGUA intends to review Union's 2012-2014 DSM Plan for consistency with the Board's established framework, and to consider any changes to the plan relative to the 2011 plan. In particular IGUA anticipates active involvement in review of Union's response to the Board's June 30, 2011 DSM Guidelines as they relate to the continuation of large industrial DSM programming.

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:

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Yours truly,


Ian A. Mondrow

c: Murray Newton (IGUA)
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