

May 1, 2013

**VIA RESS AND COURIER**

Ms. Kirsten Walli  
**ONTARIO ENERGY BOARD**  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario  
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File No. T995820

Dear Ms. Walli:

**Re: EB-2013-0074 – Union Gas Limited (Union) Brantford-Kirkwall/Parkway D Project.**

**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.

We note that IGUA has been granted intervenor status in two related applications: i) Union's Parkway West application [EB-2012-0433]; and ii) Enbridge Gas Distribution's (EGD) Greater Toronto Area Project application [EB-2012-0451]. As the projects that are the subject of these 3 proceedings are, to some extent, interdependent, we anticipate that the Board will want to either combine the 3 proceedings, or to hear them together and in a coordinated fashion. We submit this request for IGUA to be granted intervenor status in this proceeding as well.

**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's constituents have a direct interest in the major infrastructure initiatives proposed by Union, and both the gas supply and rate impacts thereof.

IGUA will review Union's evidence and will then be able to determine with more particularity its position on the matters to be reviewed in this proceeding. IGUA anticipates being generally active as this proceeding progresses.

## **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*. We also note that IGUA has been determined to be eligible for recovery of costs in the two related proceedings noted above.

## **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: K. Hockin (Union)  
C. Smith (Torys)  
S. Rahbar (IGUA)  
J. Wasylyk (Board Staff)