

August 30, 2013

VIA RESS AND COURIER

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

Ian A. Mondrow
Direct: 416-369-4670
ian.mondrow@gowlings.com

Assistant: Cathy Galler
Direct: 416-369-4570
cathy.galler@gowlings.com

File No. T998373

Dear Ms. Walli:

Re: EB-2013-0202 – Union Gas Limited (Union) 2014-2018 IRM 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 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

As representative of Union's large volume industrial customers IGUA intends to continue to actively participate in natural gas related regulatory proceedings. IGUA participated actively in the proceeding which established Union's 2007 through 2012 incentive rate plan, and in the rate setting and earnings sharing/variance account disposition proceedings advanced under that plan, as well as in Union's 2013 rate setting process.

IGUA also participated actively in Union's consultation which preceded the filing of the instant application, and is a party to the settlement agreement filed in support of this application. As such IGUA has a direct interest in the disposition of this application and would like to participate in it.

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:

Ian Mondrow, Partner
GOWLING LAFLEUR HENDERSON LLP
Suite 1600, 1 First Canadian Place
100 King Street West
Toronto, Ontario
M5X 1G5

Phone: 416-369-4670
Fax: 416-862-7661
E-Mail: ian.mondrow@gowlings.com

Dr. Shahrzad Rahbar
President
INDUSTRIAL GAS USERS ASSOCIATION
350 Sparks Street, Suite 502
Ottawa, Ontario
K1R 7S8

Office: 613-236-8021
Mobile: 613-983-2927
Email: srahbar@igua.ca

Yours truly,



Ian A. Mondrow

c: C. Ripley (Union)
G. Vegh (McCarthy Tetrault LLP)
S. Rahbar (IGUA)
K. Viraney (Board Staff)

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