

December 9, 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. T998376

Dear Ms. Walli:

Re: EB-2013-0365 – Union Gas Limited (Union) 2014 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 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 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 test year

rate rebasing. IGUA also participated actively in the recent proceeding which established, by settlement ultimately accepted by the Board, Union's current (2014 through 2018) rate plan. IGUA intends to continue to participate on behalf of Union's large industrial gas customers in rate setting proceedings under the current rate plan.

In this 2014 rate proceeding in particular, IGUA intends to participate centrally in review of Union's proposal for elimination of the Parkway delivery obligation. The continued efficacy and equity of that delivery obligation was raised by IGUA in Union's 2013 rate proceeding (EB-2011-0210) where it was agreed, and ultimately endorsed by the Board, that the matter would be the subject of a working group, and would come back before the Board in this application. IGUA participated actively in the intervening working group. The Parkway delivery obligation is borne by large direct purchase customers, including several IGUA member companies, and IGUA anticipates that this topic will be the primary focus of its intervention in this application, including through the presentation of evidence on the matter.

There may be other issues of interest to IGUA in this application, of which IGUA will advise the Board and the parties in due course.

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

Phone: 613-236-8021
Fax: 613-230-9531
Email: srahbar@igua.ca

Yours truly,



Ian A. Mondrow

c: C. Ripley (Union)
C. Smith (Torys)
S. Rahbar (IGUA)
K. Viraney (Board Staff)

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