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May 30, 2014

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

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

File No. T1001486

Dear Ms. Walli:

# Re: EB-2014-0145 – Union Gas Limited (Union) 2013 Disposition of Deferral Account Balances.

# 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 gas distribution rate related proceedings. IGUA was an active participant in Union's 2013 rate proceeding, and seeks to continue its participation in these matters through intervention in this application to dispose of 2013 deferrals.

IGUA will review Union's evidence and will then be able to determine with more particularity its position on Union's proposed dispositions, insofar as they impact Union's large volume customers. 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*.

### **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: K. Hockin (Union)
  - C. Smith (Torys)
  - S. Rahbar (IGUA)
  - L. Gluck (Board Staff)

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