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Kirsten Walli
Board Secretary
ONTARIO ENERGY BOARD
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E5

Re: EB-2008-0069 - Enbridge Gas Distribution's (EGD) July 1st QRAM Application.

We write as legal counsel to the Industrial Gas Users Association (IGUA). IGUA's advisors have reviewed EGD's Application for quarterly adjustment of rates (QRAM) to be effective July 1st, 2008. Based upon their advice, and conformance of EGD's application with the Board approved QRAM process, IGUA does not oppose approval of the July QRAM.

IGUA does note that, combined with the impact of TCPL toll increases, the recent run up in gas costs has resulted in proposed July 1st rate changes that are significant, from the perspective of any customer. For large volume customers, EGD's bill comparison for typical T-services customers shows average bill increases ranging from approximately 13% to 30%, depending on the rate class. However, IGUA also believes that the QRAM methodology is working as intended in that rates continue to generally reflect changes in underlying gas costs. Accordingly, for the purposes of this application, IGUA does not oppose the rate adjustments requested by EGD.

Pursuant to the Board's *Practice Direction on Cost Awards*, IGUA is eligible to apply for a cost award as a party primarily representing the direct interests of ratepayers in relation to regulated gas services. IGUA requests that the Board award it costs reasonably incurred in review of EGD's QRAM.

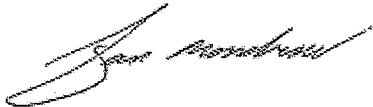
As stated in IGUA's recent submission regarding Union Gas Limited's (Union) July 1st QRAM, IGUA reviews QRAM applications as a matter of course, in order to properly discharge its mandate and responsibility to protect its members' interests in respect of gas regulatory matters, including appropriate application of the Board approved quarterly rate adjustment mechanism. IGUA has, in the past, been awarded modest costs for review of QRAM applications. In making

such awards IGUA respectfully submits that the Board has recognized some value (commensurate with modest costs) in the independent and informed review of such applications that IGUA provides.

IGUA continues to be mindful of the need for efficiency in its regulatory interventions, in particular in respect of relatively non-contentious matters such as is the case with QRAM applications. With Union's July 1st QRAM, and continuing with this QRAM, IGUA has instituted a new internal review process for these matters. IGUA has retained Aegent Energy Advisors Inc., whose professionals are expert in Ontario gas commercial and regulatory matters, including rate matters in particular. Aegent conducts a cursory review of the application as filed, and provides a report to IGUA. Provided that Aegent's report does not indicate any concerns with either the application of the QRAM protocols or the rate outcome, IGUA is in a position to advise the Board that it has no cause for objection, as is the case in respect of the instant application. IGUA submits that through this process, IGUA is acting responsibly and informing the Board's review and decision on the application, while maintaining due attention to cost efficiency. On this basis, IGUA is requesting an award of costs for its participation in this process.

Sincerely,

MACLEOD DIXON LLP



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Patrick Hoey, Enbridge Gas Distribution
Valerie Young, Aegent Energy Advisors Inc.