

April 20, 2015

VIA RESS AND COURIER

Ms. Kirsten Walli
ONTARIO ENERGY BOARD
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ontario
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File No. T1002922

Dear Ms. Walli:

Re: EB-2015-0120 – Union Gas Limited (Union) Sudbury Expansion 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 that IGUA be granted intervenor status in the captioned proceeding.

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.

The Association's activities are guided by a 15 member Board of Directors, constituted to assure that each industrial sector and geographic region is represented. The Board of Directors has regularly scheduled meetings at least six times each year. A full time President and other staff are based in a permanent office in Ottawa.

Through regulatory intervention, government advocacy, marketing, promotion, partnerships, education and outreach, IGUA successfully represents industrial gas users. Our mission is to be the voice of our members within the natural gas industry through intervention, advocacy, and partnerships.

Nature and Scope of IGUA's Intended Participation

Union's Notice of Application herein was brought to IGUA's attention by its members in the Sudbury area, who are served by Union's Sudbury pipeline system. These members are, and have for some time, been concerned about natural gas distribution capacity constraints on this system and Union's plans to alleviate such constraints. IGUA intends to explore the planning basis for the expansion proposed in this application, and how the instant proposal fits within the broader context of planning for appropriate continued expansion of the Sudbury system in order to meet both current and anticipated gas service requirements in the area.

In respect of the need for an oral hearing, it is not clear to IGUA at present whether the record to be completed in respect of how the instant proposal fits within the broader context of proper planning and expansion to meet the current and future gas distribution requirements of Union's customers in the Sudbury area will admit of an entirely written process. IGUA respectfully requests that the Board defer that determination until written discovery has concluded and the written evidentiary record is complete. At that time the Board will be in a better position, informed by the views of active parties (including IGUA), to determine whether an oral phase to the proceeding would be of assistance to the Board.

IGUA intends to be active in all phases of this proceeding, including discovery, any oral hearing phase convened, and argument. Depending on Union's interrogatory responses, IGUA may also seek to file evidence.

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:

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We have retrieved an electronic copy of the prefiled materials and do not require a hard copy.

Yours truly,



Ian A. Mondrow

c: M. Murray (Union)
S. Rahbar (IGUA)
K. Viraney (Board Staff)

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