

May 6, 2015

**VIA RESS AND COURIER**

Ms. Kirsten Walli  
**ONTARIO ENERGY BOARD**  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario  
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File No. T1002920

Dear Ms. Walli:

**Re: EB-2015-0029 – Union Gas Limited (Union) 2015-2020 DSM Plan.**

**Industrial Gas Users Association (IGUA) Request for Intervention.**

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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**

IGUA has taken an active interest in DSM related proceedings for many years. IGUA respectfully suggests that its policy submissions on iterations of the Board's DSM frameworks, including the most recent one, have informed the substance of those frameworks. IGUA continues to have a direct interest, on behalf of its members, in the proposals for large industrial DSM programming advanced by Union in the instant application.

IGUA intends to be active in all phases of this proceeding, and intends to explore the appropriate application of the Board's determination that large industrial customers should no longer be subject to ratepayer funded DSM. In this respect, IGUA will consider filing evidence, and in any event currently anticipates that an oral hearing would be appropriate. IGUA suggests that the Board make provision for an oral hearing, subject to later adjustment should the record as it develops indicate an absence of contentious factual issues in respect of which oral evidence would be appropriate and of assistance to the Board.

### **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,

A handwritten signature in blue ink, appearing to read "Ian A. Mondrow".

Ian A. Mondrow

c: V. Innis (Union)  
A. Smith (Torys)  
S. Rahbar (IGUA)  
L. Gluck (Board Staff)

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