

July 27, 2015

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
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Dear Ms. Walli:

Re: EB-2015-0181 – Union Gas Limited (Union) Dawn Reference Price and North T-Service Application.

Industrial Gas Users Association (IGUA) Request for Intervention.

Further to Union's Application and pre-filed evidence 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 been active before the Board in various proceedings – applications and policy reviews – regarding the evolution of Ontario's gas market. During the recent Natural Gas Market Review (EB-2014-0289) IGUA raised the prospect of adoption of a Dawn reference price for Ontario. IGUA has also been involved in discussions with both Union and Enbridge Gas Distribution regarding the development of new services for large customers, attendant on the ongoing shift of supply to Dawn and the expansion of the Dawn-Parkway-Maple transmission system.

IGUA intends to be an active participant in this application, and will seek to understand and provide input to the Board on the value to, and impacts on, Ontario's large volume gas consumers of the proposed Dawn reference price and North T-service.

Written or Oral Hearing

IGUA will have a better view of whether a written hearing would be appropriate in this application, or whether an oral hearing would be advisable, following review of the balance of the pre-filed materials.

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

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