

July 29, 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
Direct: 416-369-4670
ian.mondrow@gowlings.com

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

Dear Ms. Walli:

Re: EB-2015-0179 – Union Gas Limited (Union) Community Expansion Program.
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's interest in this application relates to the cost impacts on existing customers, if any, of the proposed community expansion plans. This is the first application of its type to come before the Board, and IGUA expects that the Board will be asked to consider development of a policy regarding the rate treatment of expansion projects that do not qualify as economic under the Board's historically applied tests. As representative of large industrial distribution customers, IGUA will be interested in how Union proposes, and the Board determines, such "uneconomic" community expansions should be evaluated and funded.

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. However, as noted above, and given that: i) this is the first application of its kind to come before the Board; and (ii) IGUA expects that the Board will be seized of a number of policy considerations arising out of Union's proposals, it seems to IGUA advisable that the Board contemplate a schedule which includes provision for an oral hearing, if ultimately deemed appropriate.

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
E-Mail: srahbar@igua.ca

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

Yours truly,



Ian A. Mondrow

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

TOR_LAW 8749376\1