

September 22, 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  
M4P 1E4

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Dear Ms. Walli:

**Re: EB-2015-0233 – Enbridge Gas Distribution Inc. (EGD) Application for Exemption from the Affiliate Relationships Code for Gas Utilities (ARC).**

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

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A copy of EGD's Notice of Application and prefiled evidence in the captioned matter has recently been brought to our attention. (IGUA was not served directly with these materials, and thus the delay in our response to the Notice.) 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 intends to be an active participant in this application. Based on our preliminary review of the application IGUA anticipates filing a small number of interrogatories to confirm its understanding of the application, and providing brief submissions on the relief requested.

### **Written or Oral Hearing**

As the record currently stands, a written hearing may be the most expeditious approach to consideration and determination of this application.

### **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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**GOWLING LAFLEUR HENDERSON LLP**  
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100 King Street West  
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We have an electronic copy of the prefiled materials and do not require a hard copy.

Yours truly,



Ian A. Mondrow

c:     A. Mandyam (EGD)  
       G. Pannu (EGD)  
       D. O'Leary (Aird & Berlis, Counsel for EGD)  
       R. Mozayyan (OEB Staff)

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