

October 6, 2015

VIA RESS AND COURIER

Ms. Kirsten Walli
ONTARIO ENERGY BOARD
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ontario
M4P 1E4

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Dear Ms. Walli:

Re: EB-2015-0116 – Union Gas Limited (Union) 2016 Rates Application.

Industrial Gas Users Association (IGUA) Request for Intervention.

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 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 was an active participant in Union's cost of service and IRM proceedings which established the current (2014-2018) rate plan under which this application is proceeding. IGUA was also an driving participant in the Parkway Delivery Obligation Settlement forming part of Union's 2014 Rate Application (EB-2013-0365). As such, IGUA has an interest in the proposed rate and tariff (i.e. conditions of service) adjustments brought forward in this proceeding.

IGUA intends to review this application in general, but anticipates focussing its review primarily on the following topics addressed in the evidence: i) the proposed new Unauthorized Overrun Compliance Rate; ii) implementation of the Parkway Delivery Commitment Incentive (PDCI) proposed to be effective November 1, 2016; iii) Union's proposed LRAM related adjustments for the contract rate classes; iv) the inclusion in delivery rates of y-factor adjustments related to capital projects, including those subject to ongoing leave to construct applications; and v) proposed changes to the manner in which nomination cycle timelines are addressed in Union's approved conditions of 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 and conclusion of the anticipated interrogatory process. IGUA respectfully suggests that the Board contemplate a schedule which includes provision for a brief 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:

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

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