

February 18, 2016

VIA RESS AND COURIER

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

Re: EB-2015-0276 – Union Gas Limited (Union) Application for 2014 Demand Side Management Clearance of Variance Accounts.

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.

We appreciate that this intervention request is slightly late. IGUA has spent some time considering the Board's *Decision and Order* in Enbridge Gas Distribution Inc.'s (EGD) and Union's 2015-20 DSM Plan approval applications, and has concluded that it must, as a result of that decision, remain active in Ontario DSM proceedings such as the current application.

We confirm that IGUA will accept the record herein as it currently stands. We note that the first post-notice substantive step in this matter, the submission of interrogatories, has yet to close. Accordingly, no party will be prejudiced by the granting of this intervention request.

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

As noted above, having considered the Board's EB-2015-0029/EB-2015-0049 *Decision and Order* in Union's and EGD's 2015-20 DSM Plan approval applications, IGUA has concluded that it must, as a result of that decision, remain active in Ontario DSM proceedings such as the current application.

IGUA's interest in this proceeding will be review of the balances sought to be cleared to large industrial ratepayers, and validation of the large volume customer DSM evaluations and resulting allocations supporting those balances.

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 an electronic copy of the prefilled materials and do not require a hard copy.

Yours truly,



Ian A. Mondrow

c: V. Innis (Union)
A. Smith (Torys LLP, Counsel for Union)
S. Rahbar (IGUA)
V. Mazzone (OEB Staff)
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