

April 20, 2016

VIA RESS AND COURIER

Ms. Kirsten Walli
ONTARIO ENERGY BOARD
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Dear Ms. Walli:

**Re: EB-2016-0028 – Enbridge Gas Distribution Inc. (EGD) Application for Approval of
Tariff for Rate 332 Transportation Service.**

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

We write as legal counsel to IGUA to request that IGUA be granted intervenor status in the captioned proceeding.

We are aware of the Board's Procedural Order No. 1 herein, and IGUA is prepared to accept the record to date as it stands and to abide by the procedural deadlines provided for in that procedural order.

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 a participant in the facilities proceedings [EB-2012-0451] in which EGD was granted leave to construct its GTA Project, including Segment A, recover the costs associated with Segment A, and allocate those costs as between the transportation and distribution functions for which the facilities were designed and constructed. IGUA was also a participant in EGD's 2014-18 rate plan proceeding [EB-2012-0459] in which the Board accepted EGD's Segment A transportation rate (Rate 332) proposal.

Given these prior determinations, IGUA does not anticipate that the current application will be particularly contentious. However, IGUA would like to review and consider the balance of the record to be provided in the instant application in respect of the execution by EGD of its obligations under the Board's *Storage and Transmission Access Rule* and the finalization of the Rate 332 tariff as described in EGD's 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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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)
F. Cass (Aird & Berlis, Counsel for EGD)
S. Rahbar (IGUA)
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