

May 3, 2016

**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

Ian A. Mondrow  
Direct 416-369-4670  
ian.mondrow@gowlingwlg.com

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

Dear Ms. Walli:

**Re: EB-2016-0118 – Union Gas Limited (Union) 2015 Disposition of Deferral Account Balances.**

**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**

As representative of Union's large volume industrial customers IGUA intends to continue to actively participate in gas distribution rate related proceedings. IGUA was an active participant in Union's 2014-18 Rates Application (EB-2013-0365) and Union's 2015 Rates Application (EB-2014-0271), and seeks to continue its participation in these matters through intervention in this application to dispose of 2015 deferrals.

IGUA will review Union's evidence and will then be able to determine with more particularity its position on Union's proposed dispositions, insofar as they impact Union's large volume customers.

### **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 WLG (CANADA) 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@gowlingwlg.com](mailto:ian.mondrow@gowlingwlg.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](mailto:srahbar@igua.ca)

We have 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)  
L. Gluck (OEB Staff)

TOR\_LAW\ 8933563\1