

January 16, 2017

VIA RESS AND COURIER

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

Re: EB-2016-0137; EB-2016-0138; EB-2016-0139 – EPCOR Southern Bruce Gas Inc. Applications for Approval of Franchise Agreements and Certificates of Public Convenience and Necessity for the Municipality of Arran-Elderslie, the Municipality of Kincardine and the Township of Huron-Kinloss.

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 large volume industrial customers, IGUA supports robust competition in energy markets. IGUA was an active participant in Union Gas' recent gas community expansion application [EB-2015-0179] and in the Board's generic gas expansion framework review that arose therefrom [EB-2016-0004].

IGUA welcomes the entry of EPCOR into Ontario's gas market. IGUA wishes to intervene in the instant proceeding in order to protect the interests of its members in efficient competition in, and fair pricing of, gas services. IGUA anticipates that its focus will be on appropriate implementation of the Board's new gas expansion framework to the applications before it.

Written or Oral Hearing

As EPCOR is a new applicant before the Board and as the precise nature and scope of the Board's inquiries in gas expansion applications has yet to be determined under the recently released framework, IGUA anticipates that an oral hearing will be required.

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: B. Tan (EPCOR Utilities Inc.)
S. Rahbar (IGUA)
A. Manzano (OEB Staff)
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