

February 24, 2017

VIA RESS AND COURIER

Laura Van Soelen
Direct: 416-862-3646
laura.vansoelen@gowlingwlg.com

T1011041

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

Dear Ms. Walli:

**Re: EB-2016-0246 – Union Gas Limited (Union) and Enbridge Gas Distribution Inc. (EGD)
New and Updated DSM Measures and the Technical Reference Manual (TRM).**

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 intends to explore the "several specific matters" addressed in the TRM in respect of which Mr. Shepherd has expressed concern (as reported, but not particularized, on page 4 of the application). IGUA will then be in a better position to assess its position on the approvals sought.

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 (included ratepayer funded DSM), 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:

Laura Van Soelen, Partner
GOWLING WLG (CANADA) LLP
Suite 1600, 1 First Canadian Place
100 King Street West
Toronto, Ontario
M5X 1G5

Phone: 416-862-3646
Fax: 416-862-7661
E-Mail: laura.vansoelen@gowlingwlg.com

Dr. Shahrzad Rahbar
President
INDUSTRIAL GAS USERS ASSOCIATION
260 Centrum Boulevard, Suite 202
Orleans, Ontario
K1E 3P4

Office: 613-236-8021
Mobile: 613-983-2927
E-Mail: srahbar@igua.ca

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

We have an electronic copy of the prefiled materials and do not require a hard copy.

Yours truly,

GOWLING WLG (CANADA) LLP


Laura Van Soelen

c: V. Innis (Union)
C. Smith (Torys LLP)
K. Culbert/Regulatory Affairs (EGD)
D. O'Leary (Aird & Berlis LLP)
S. Rahbar (IGUA)

TOR_LAW\9124404\1