

May 31, 2017

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

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

T1011979

Dear Ms. Walli:

# Re: EB-2017-0102 – Enbridge Gas Distribution Inc. (EGD) 2016 Earnings Sharing Mechanism and Other Deferral and Variance Accounts Clearance Review.

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.

T +1 416 862 7525 F +1 416 862 7661 gowlingwlg.com



### Nature and Scope of IGUA's Intended Participation

As representative of EGD's large volume industrial customers IGUA intends to continue to actively participate in gas distribution rate related proceedings. IGUA was an active participant in EGD's 2014-18 Rates Application (EB-2012-0459) and EGD's 2016 Rates Application (EB-2015-0114), and seeks to continue its participation in these matters through intervention in this application to dispose of 2016 deferrals.

IGUA is reviewing EGD's evidence and will then be able to determine with more particularity its position on EGD's proposed dispositions, insofar as they impact EGD'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		Dr. Shahrzad Rahbar	
<b>GOWLING WLG (CANADA) LLP</b>		President	
Suite 1600, 1 First Canadian Place		<b>INDUSTRIAL GAS USERS ASSOCIATION</b>	
100 King Street West		260 Centrum Boulevard, Suite 202	
Toronto, Ontario		Orleans, Ontario	
M5X 1G5		K1E 3P4	
Phone:	416-369-4670	Office:	613-236-8021
Fax:	416-862-7661	Mobile:	613-983-2927
E-Mail:	ian.mondrow@gowlingwlg.com	E-Mail:	srahbar@igua.ca
Laura Van Soelen, Partner <b>GOWLING WLG (CANADA) LLP</b> Suite 1600, 1 First Canadian Place 100 King Street West Toronto, Ontario M5X 1G5			
Phone: Fax: E-Mail:	416-862-3646 416-862-7661 laura.vansoelen@gowlingwlg.com		



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

Yours truly,

montran lan A. Mondrow

c: A. Mandyam (EGD) D. Stevens (Aird & Berlis LLP) S. Rahbar (IGUA) L. Gluck (OEB Staff)

TOR\_LAW\ 9182263\1