

July 5, 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  
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Dear Ms. Walli:

**Re: EB-2017-0127 and EB-2017-0128 – DSM Mid-Term Review.**

**Industrial Gas Users Association (IGUA) Interest in Participating.**

We write as legal counsel to IGUA, and in response to the Board's June 20<sup>th</sup> notice to interested parties regarding the captioned consultation, to express IGUA's interest in participating.

**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**

Most of IGUA's Ontario members are "large final emitters" (LFEs) for the purposes of Ontario's proposed cap and trade regime. As such, IGUA wishes to consider and comment on the first of the issues identified by the Board for Part 1 of this consultation;

*Consideration of the relationship between the current suite of DSM programs and actual C&T activities of customers with their own compliance obligations.*

IGUA also wishes to participate in Part 2 of this consultation, and will have a particular interest in the following studies/reports expected to be provided by the distributors and considered by the Board:

- Information showing how the distributors have lowered the free ridership rates of their custom programs.
- Movement of Comprehensive Energy Management and Strategic Energy Management programs to the Resource Acquisition Scorecard.
- Transition plans to incorporate DSM into infrastructure planning activities.

### **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 participation 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 Copies of Materials and Contact Information**

IGUA requests that copies of written materials and circulated correspondence related to this matter be directed to it as follows:

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Yours truly,



Ian A. Mondrow

c: Dr. Shahrzad Rahbar (IGUA)  
Valerie Bennett (Board Staff)