

December 18, 2017

VIA RESS AND COURIER

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

**Re: EB-2017-0307 – Enbridge Gas Distribution Inc. (EGD) and Union Gas Limited (Union)
2019-2028 Rate Framework Application.**

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 be active in all phases of this proceeding. We are in the process of reviewing the prefiled materials herein, and in the related application for leave to amalgamate [EB-2017-0306] (MAADs Application), and will be in a better position to determine which particular issues IGUA will focus on once our review is completed.

Written or Oral Hearing

We have reviewed EGD's November 28, 2017 letter filed herein and in the related application for leave to amalgamate. EGD has suggested, in chronological order:

1. Written interrogatories in the MAADs Application followed by written Interrogatories in this rate mechanism proceeding.
2. If deemed necessary or appropriate, a technical conference in the MAADs Application followed by a technical conference in this rate mechanism proceeding.
3. Written arguments in respect of the MAADs Application.
4. An oral hearing of this rate mechanism application, followed by argument in this application.

We have also reviewed the December 12th letter from Mr. Shepherd on behalf of SEC filed herein and in the related MAADs Application.

We share Mr. Shepherd's observation that there may be interrelationships between the issues raised in this rate mechanism application and those raised in the MAADs Application. Parties should thus be able, in the discovery processes of these two proceedings, to include inquiries which explore such potential interrelationships. It may well be more efficient, as Mr. Shepherd suggests, to combine the interrogatory and technical conference processes for the two applications.

It is premature to determine post discovery process for either of the two applications. We and other interested parties will have a more informed view, and the Board will be in a better position, to determine post-discovery process for these matters once the discoveries have been concluded. Parties should have an opportunity to provide input on the balance of the two processes at that time, to inform the Board's further procedural determinations.

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: A. Mandyam (EGD)
M. Kitchen (Union)
F. Cass (Aird & Berlis)
C. Smith (Torys)
S. Rahbar (IGUA)
K. Viraney (Board Staff)

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